

THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

- 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
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots operate a robust late night working policy, which is fully supported by a full-time Night Manager.

- Merkur Slots does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

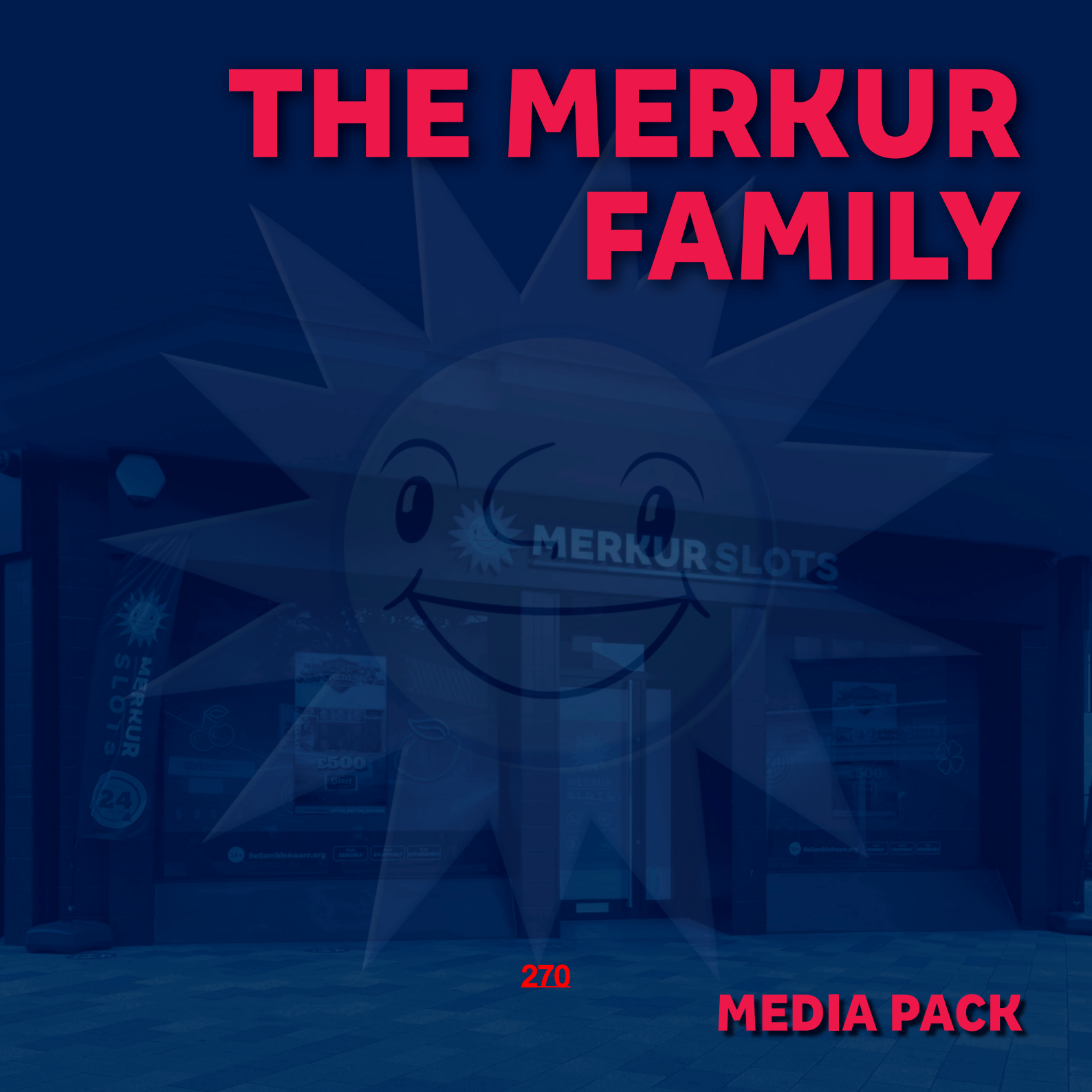
Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.

- We provide an annual donation in support of research, education and treatment of problem gambling.

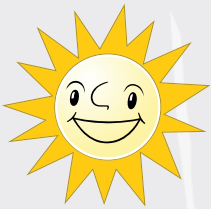
All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

THE MERKUR FAMILY



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MEDIA PACK



PART OF THE GAUSELMANN GROUP

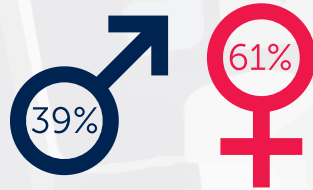
A Strong Partner For More Than 60 Years



**MERKUR
CASINO**

Merkur Casino UK, formerly Praesepe, is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



61% of employees are female
39% of employees are male

Merkur Slots is the main UK brand. All Merkur Cashino and Cashino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.

Merkur Bingo clubs, formerly Beacon Bingo, are very important to our customers in their local communities. Our teams strive to deliver not just great service but a Bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.



**MERKUR
SLOTS**



**MERKUR
BINGO**

MYTHBUSTERS

We Are Not Betting Shops

Merkur Casino UK is one of the UK's largest operators of High Street Adult Gaming Centres (AGCs). AGCs are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how AGCs operate and who our customers are. We want to address these misconceptions and demonstrate that a new AGC on your local high street is a good thing. Public concerns surrounding betting shops were largely due to the presence of Fixed Odds Betting Terminals (FOBTs). Our venues do not offer these types of machines. Our machines offer low stakes ranging from 10p to a maximum of £2. These machines have been around for many, many years.

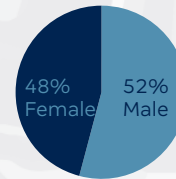


Our AGCs are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

The market on the high street has evolved with venues now providing electronic bingo tablets.



The average stake from our customers is between 30-40p.

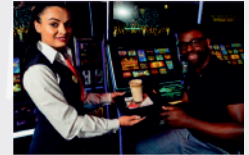


Our venues appeal to all ages with our membership gender database split of 52% male / 48% female.



Our teams remain with the customers on the venue floor rather than behind a counter.

We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.





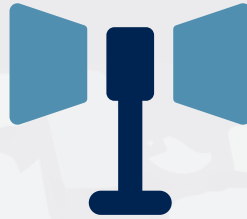
OUR OPERATION

We Are Not Noisy Neighbours

Whilst we sit within the leisure sector, noise levels are very low and limited from our venues. We currently operate 24 hours in over 90 venues.



Our machines generate low levels of noise.



We do not have tannoy systems that you find in seaside amusement centres.



We only play background music like at any other high street shop.



We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti-social behaviour.



Customers tend to visit on their own or in couples. We rarely see large groups.



We do not serve alcohol on our premises.

Our customer base after midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts.

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RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK, Merkur Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

Merkur Casino is regulated by the Gambling Commission and Licensing Authorities

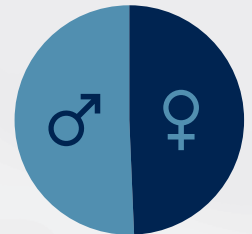


We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.

Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Merkur Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on “The Essentials of Compliance and Social Responsibility” and “Safeguarding Children and Vulnerable People”.



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self-help tool for customers to manage their gambling.

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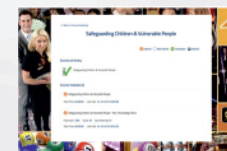
Compliance



Training Centre



Online Training



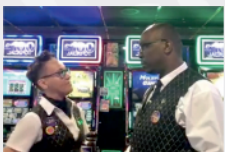


SOCIAL RESPONSIBILITY MEASURES IN PLACE

Machine Messaging



Customer Interaction Training



All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling. Our recent commitments include: Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.



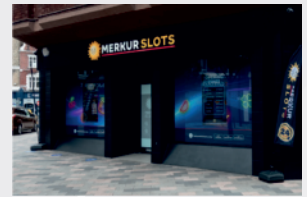
Merkur Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our Merkur 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

Merkur Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



- Senior Manager representation Divisional meetings.
- Operations Director is the Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.
- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street include:



Over 90% of new Merkur Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings.



INSPECTOR APPEAL QUOTES

Have Highlighted The Following:

1

Ballards Lane, Finchley, London *February 2021*

“Bringing the host property back into use would provide environmental benefits for the Finchley Church End Town Centre. In addition, there would be social and economic benefits for the locality, both from employment opportunities and the occupation of the building.”

2

St Peter’s Hill, Grantham *September 2020*

“The proposal could be expected to generate linked trips with cafes, bars, restaurants and other leisure facilities in the centre. The site’s location in close proximity to public houses, restaurants and the new cinema would increase its potential to make a positive contribution to the vibrancy of the town centre in the evenings.”

3

Sepulchre Gate, Doncaster *August 2020*

“The use proposed would support the vitality and viability of the town centre and bring a vacant unit back into use, facilitating a use which could add to the footfall and increase the opportunity for shared trips. It would also add to the evening economy being a use that would be open up to 24 hours, and also subsequently increase employment opportunities.”

4

Holderness Road, Hull *August 2020*

“In relation to the proposed opening hours, the application submission indicates it would be in 24 hour operation on all days of the week. This is not unacceptable with its District Centre location. Thus, a restriction on the opening hours would also not be reasonable and necessary.”

5

Vicar Street, Kidderminster *March 2020*

“I have not been provided with any substantive evidence that the proposed AGC would have an adverse impact on crime, anti-social behaviour, vulnerable groups and mental health and that it would add to the deprivation in the area.”

COMMUNITY & CHARITY

Merkur Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of
£1.2 million for good causes since 2005

Please contact us

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THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, using TITO technology to conceal 'fake notes', life style and spending habits.

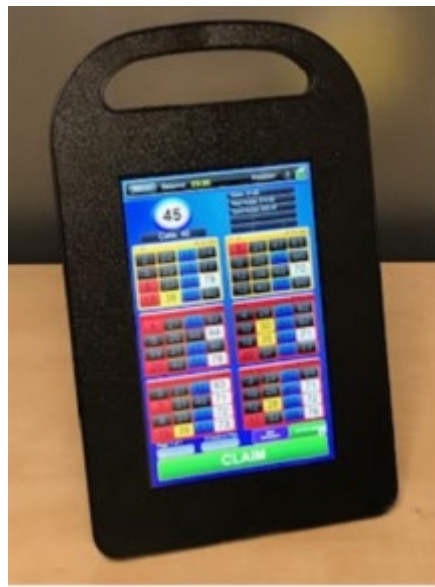
2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

G-TAB Bingo



**Bringing Traditional Bingo
to the High Street**

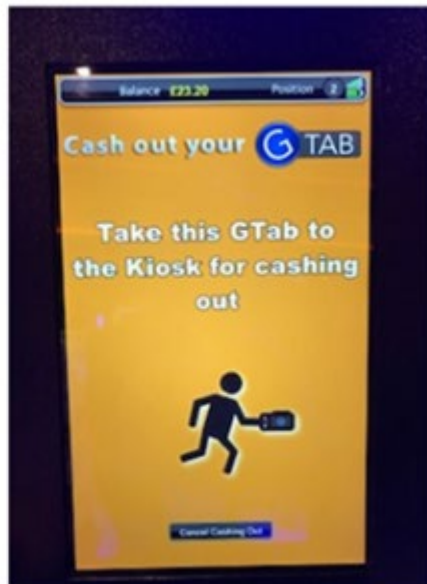
G-Tab is a multi-purpose gaming device offering live link Bingo Games, Bingo Variant Games and participation in the National Bingo Game which is played twice daily. Bingo tablets are bingo machines that provide games of both remote and non-remote bingo with remote bingo being the linked games operated via WiFi and the internet on licensed premises. Complies with the appropriate Gambling Commission Technical Standards and Machine Guidance.

Standalone Tablet Terminal

Bingo numbers announced and shown live on the top display



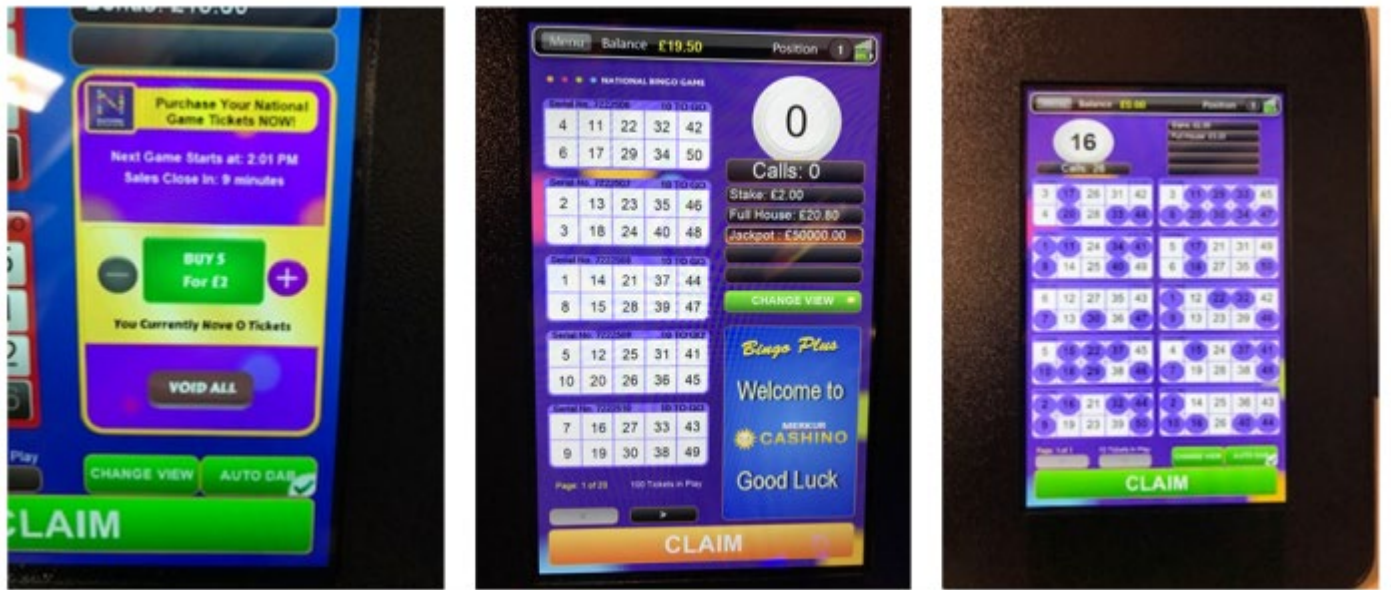
Charges to play clearly displayed



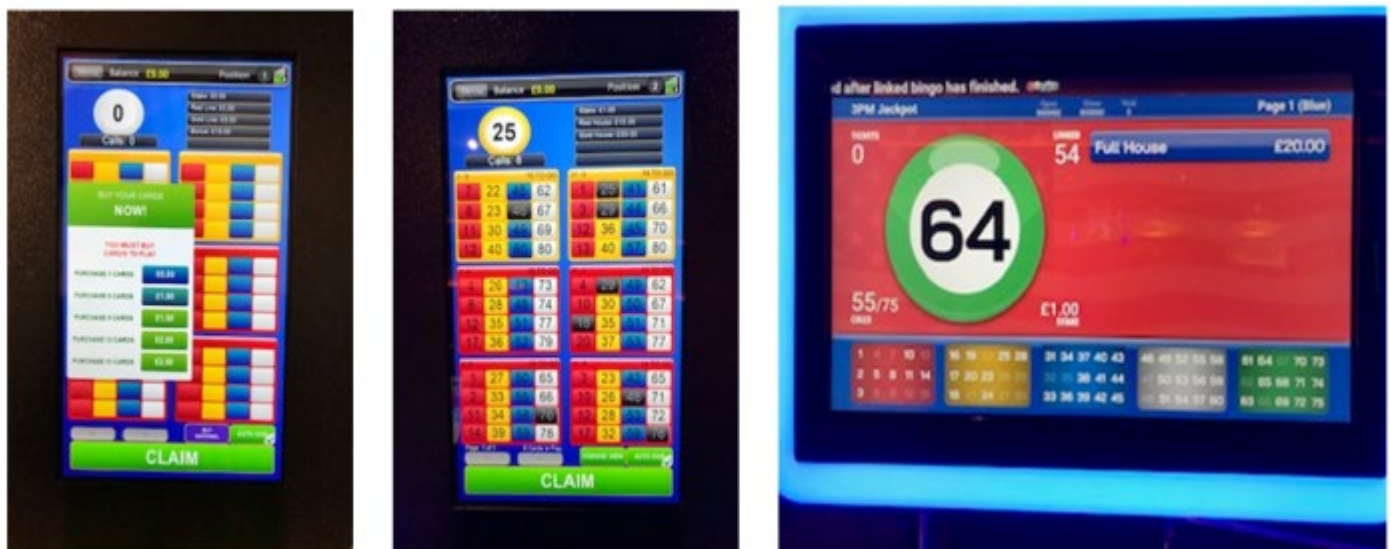
Customers cannot stake-up once game has commenced

“Making all traditional forms of Bingo like ‘Shutter Bingo’ played at the sea-side or ‘main-stage’ ~~282~~ Bingo played in Clubs available”

National Bingo Game, linked to all Bingo Clubs (such as Mecca and Buzz) played twice daily (2pm and 7pm) at £2.00 for 5 tickets, maximum tickets 100 per position, making £40 maximum stake which is within the Bingo Association guidelines. Prize money including the National Jackpot is based on the number of cards in play, including bonus lines and is clearly displayed on the main display caller's unit, prior to the game commencing and on the individual tablets throughout the game.



Live Link Bingo played throughout the day from 50p for 3 cards, maximum 15 cards per position, making maximum stake of £2.50 per game. The prize money, based on number of cards in play, including bonus lines is clearly displayed on the main display caller's unit, prior to the game commencing, and on the individual tablet throughout the game.

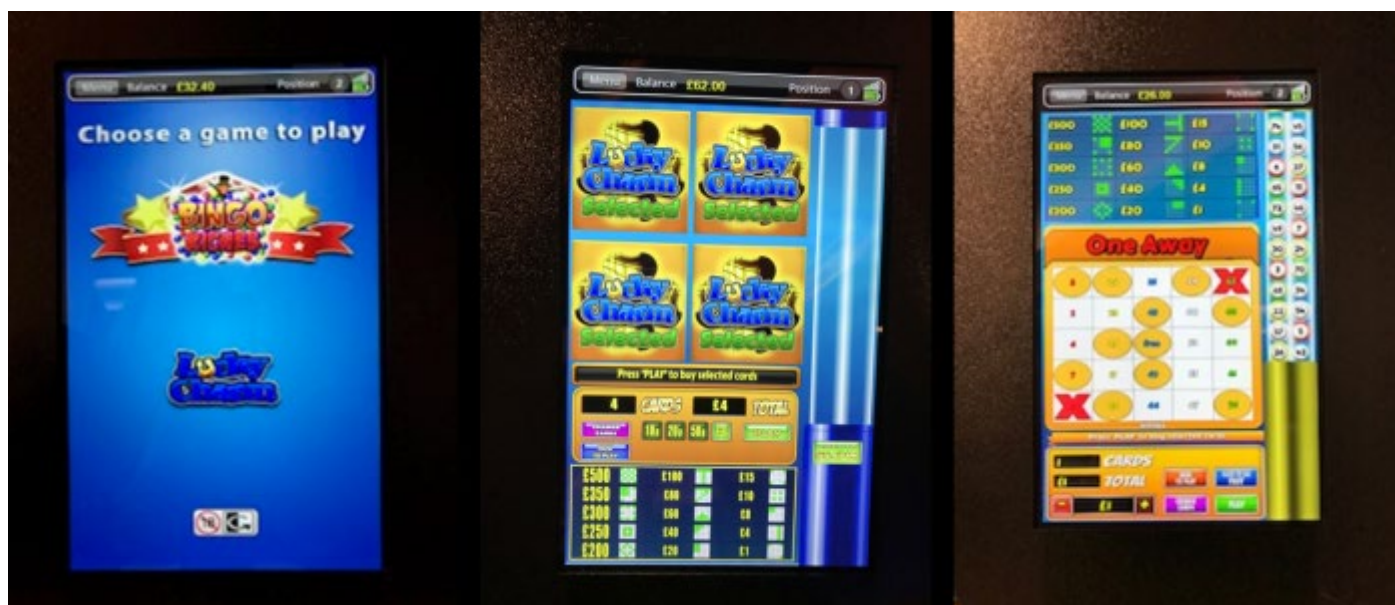


Bingo Variant (BV) Games are available 9:00 till midnight. The game of bingo stands alone on the tablet and does not connect via remote communication to a server or link to games across premises.

Bingo Riches: play from 10p (25p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £40 on 10p stake.



Lucky Charm: play from 10p (20p/50p/£1 options) per card, maximum 4 cards, so maximum stake £4 per game, with 24 bingo balls drawn and marked off various patterns to give a varied winplan, maximum prize £50 on 10p stake.



Low stake games:

The device also offers the player a choice of games which can be played from as little as 5p (maximum £1) a game all of which comply with **2014** technical standards.



MERKUR

CASINO

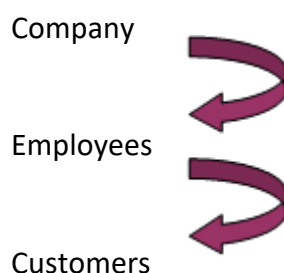
Compliance and Social Responsibility

STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. Merkur Casino UK, operating the brands Merkur Slots and Merkur Bingo, recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Casino Gaming has clear policies, procedures and codes of practice which outline and support the development of the way in which staff intervene where there is a suspected problem and the Company then monitors and supports the development of the awareness and knowledge of its staff in dealing with such interventions.

The idea of being responsible to customers has actually long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives.

These are to:

- Keep crime out of gambling
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.

It is our responsibility to ensure that we comply with these licensing objectives at all times.

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Sensible gambling procedures including Self Exclusion
- 'Think 25' policy

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist
- Employee Handbook
- Reviews and sign off at 4,8,12 weeks

The above documentation includes comprehensive coverage of the following: -

- Social Responsibility Policy
- Sensible gambling procedures
- 'Think 25' policy

Ongoing training is available to all our employees and we provide a Customer Care training programme, that specifically trains our staff about problem gambling and how to interact with customers who may be affected (including arrangements for self exclusion), whilst also covering the following areas:

- Customer care
- Conflict management
- Social responsibility

In addition, employees will receive refresher training every 6 months.

CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- Citizens advice <https://www.citizensadvice.org.uk>
- Gamble Aware <https://www.begambleaware.org>
- GamCare <https://www.gamcare.org>
- GamesAid <https://www.gamesaid.org>
- Gam-Anon <https://www.gam-anon.org>
- Gamblers Anonymous <https://www.gamblersanonymous.org.uk>
- Gordon Moody Association <https://www.gordonmoody.org.uk>
- Action for Children Charity <https://www.actionforchildren.org.uk>
- National Debtline <https://www.nationaldebtline.org>
- Betknowmore UK <https://www.Betknowmore.org>
- YGAM (Young Gamers & Gamblers Education Trust) <https://www.YGAM.org.uk>
- Leeds Community Gambling Service (via Gamcare)

The implementation of the following policies and procedures and through Customer Care Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy
- Sensible gambling Procedure
- 'Think 25' policy



Stefan Bruns
Chief Executive Officer



Mark Schertle
Chief Operating Officer



B6rris L6ngen
Chief Financial Officer

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.
- The Company 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: -
 - the numbers of people making use of the facilities and the frequency of such use.
 - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.
 - the licensee's policies in relation to, and experience of, problem gambling.
- 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.

RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

- 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.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, 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.
- 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.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online UPSKILL Training platform hosts Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.

PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however, in all circumstances the employee must ask for identification from the visitor to establish that they are a Gambling Commission Enforcement Officer.

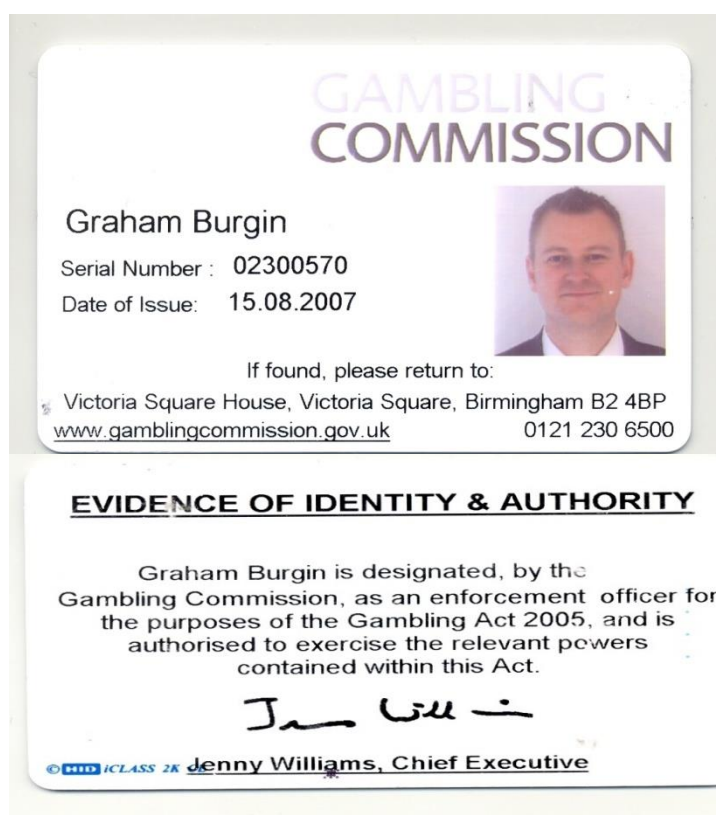
The visitor must also be requested to sign into the visitors log book.

Staff are to co-operate at all times with the Commission's Enforcement Officers in the proper performance of their compliance functions.

The Enforcement Officer may remove copies of documents as required.

Any visits by a Gambling Commission Enforcement Officer must be reported to your Area Manager and Amanda Kiernan, Head of Compliance - any supporting documents/visit reports to be copied to AKiernan@merkur-casino.com

Gambling Commission Sample ID



Front of card Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details

Back of card contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive

THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, using TITO technology to conceal 'fake notes', life style and spending habits.

2. Ensuring gambling is conducted fairly and openly

We have to ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

INTRODUCTION

This policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering and Terrorist Financing Regulation 2017 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 10th January 2020 new money laundering regulations come into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

As a result of this legislation Merkur Casino UK brands are required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a "risk based" approach.

MONEY LAUNDERING DEFINITION

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and Family Entertainment Centre (FEC), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

POLICY

Brands operating under Merkur Casino UK are committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Merkur Casino UK has appointed a designated Money Laundering Officer (MLO), Mrs. Amanda Kiernan. Email: AKiernan@merkur-casino.com

All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. **All venues** need to report any suspicious cash

transactions of any note denomination value, i.e. one stained/dyed note, and foreign coins to the value of **£50 during one machine empty or cash collection**. These incidents should be reported using the “(AML) ANTI MONEY LAUNDERING” app available on your IHL tablet. An automated alert will be sent to the Money Laundering Officer for the purpose of informing the relevant authorities.

DISCLOSURE PROCEDURE

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the “(AML) ANTI MONEY LAUNDERING” report available on your IHL tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

CASH HANDLING

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of: -

- Monetary stakes introduced to machines (gross takings where available)
- Money introduced to refloat machines
- Promo ticket transactions
- GeWeTe payouts exceeding £1k approval
- Customer refunds due to machine malfunctions
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to the effect retaining a copy for their future reference. The original is retained on the employee’s personnel file.

At Merkur Slots we have clear rules on the consumption of alcohol and guidelines to manage individuals found to be under the influence of excessive alcohol consumption or use of drugs.

It is the duty of all licensed premises to create a safe and secure environment for their customers and to take steps to promote the below licensing objective:

- Keeping crime out of gambling

It is therefore vital that all licensed premises remain vigilant when it comes to illegal drugs.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL/DRUGS ON ENTRY

In all our sites individuals who are deemed to be under the influence of excessive alcohol or drugs must be prevented from entering any of our premises. Staff are trained to identify the potential signs of someone who is under the influence of excessive alcohol or drug use.

PROCEDURE

When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty 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 SMART Tablet Incident App.

ALCOHOL CONSUMPTION ON SITE

Dependent upon which type of site you are on depends on the rules that need to be applied.

Bingo Clubs

Customers may purchase alcoholic drinks on site within the licensing regulations of the premises; however, customers must not bring alcohol onsite to be consumed.

AGC's

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

Bingo High Street

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

EXCESSIVE CONSUMPTION

For sites where alcohol may be purchased and a customer consumes to excess to the extent that their behaviour becomes inappropriate or disruptive, they should in the first instance be prevented from consuming any more alcohol and should be requested to behave appropriately or be asked to leave the premises, usually by a duty manager.

Where the individual refuses to leave the premises then the police should be contacted for further assistance.

Both violence and aggression can be indicators of distress, to gain dominance and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic Human beings tend to judge things they are familiar with as good and things not familiar as suspect.

Instinctive The best defence is attack!

Learned Behaviour Aggression is sometimes part of the behaviour we have learned from society.

Energy Source Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way society accepts and rewards.

Frustration Response When frustration in an individual reaches certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age

Psychological Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGGRESSIVE OR VIOLENT CUSTOMER

There are tell tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour. These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

PROCEDURE

Quite simply whenever there is an incident you should: -

- H Hear the customer – listen to their complaint or issues.
- E Empathise – see to understand the problem.
- A Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.
- T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: -

- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Consciously lower pitch and volume of voice.
- Speak clearly and slowly and don't stop talking because the other person doesn't answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.

- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully measure your own response, that you might, in the end, lose some of your own self-control.
- Do not give orders!
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.
- In conversation with the person being confronted use expressions such as:
 - o "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately

(remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.

PREVENTING STAFF FROM BEING ABUSED

Under no circumstances should a member of staff put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked a manager should be called. If the customer is still aggressive and still refuses to leave the premises then the police should be called.

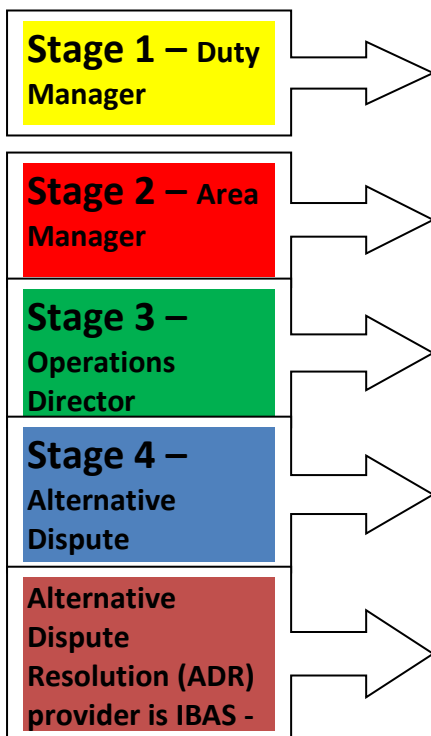
At no time should a member of staff intervene physically in the removal of an individual from a site. All incidents should be fully recorded on the IHL Smart Tablet Incident log.

Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e. drug money, the use of TITO technology to conceal 'fake notes', life style and spending habits.

The Company's written complaints procedure is available as a separate leaflet. Cashino venues operate a 4 stage complaints procedure as below.

If you receive a visit from the Gambling Commission/Local Authority they may ask you who our **Alternative Dispute Resolution (ADR)** provider is so ensure you know the answer – see details below.



COMPLAINTS & DISPUTES POLICY

Unresolved complaints or disputes regarding repayments or any other issue should be brought to the attention of the Duty Manager in the first instance.

If the complaint or dispute cannot be resolved by the Duty Manager, the matter will be referred to the General Manager for action, within 7 working days. The Duty Manager will complete the relevant form for referral to the General Manager. The form will also be logged at the head office of Merkur Slots.

If the matter cannot be resolved by the General Manager, the complainant should write to: The Operations Director, Merkur Slots Ltd., Seebeck House, 1A Seebeck Place, Knowlhill, Milton Keynes MK5 8FR.

If the Operations Director is unable to resolve the complaint or dispute to the customer's satisfaction, then the customer may refer the matter to the body with which the Company has an arrangement for alternative third party dispute resolution.

Alternative dispute resolution is provided by:
(IBAS) Independent Betting Adjudication Service Limited
P.O. Box 62639, London EC3P 3AS



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COMPLAINTS & DISPUTES POLICY

At MERKUR, we aim to provide our customers with the very best high street venue experience. We appreciate that sometimes things may not meet our high standards.

Our teams in venue will aim to resolve the issue for you there and then. We have a four stage process to resolve your issue.

- Stage 1: In the first instance your issue will be escalated to the Duty Manager to discuss with you.
- Stage 2: If the Duty Manager is unable to resolve the issue, they will advise you of this and the matter will be referred to the Area Manager for action. We understand a timely response is essential to your experience and our aim is to contact you within 7 days.
- Stage 3: If the matter requires further attention, it will then be referred to the Operations Director. We hope at this point we can reach a satisfactory outcome and you can continue to enjoy our venues.

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Stage 4: If your complaint is solely relating to betting or gambling activity, and after our internal complaints process you are unhappy with our resolution, you can submit in writing to the independent third-party alternative dispute resolution provider: IBAS (Independent Betting Adjudication Service).

IBAS (Independent Betting Adjudication Service)
P.O.Box 62639
London
EC3P 3AS

If you wish to contact us directly, the quickest way to do this is via our online Customer Care:



<https://customercare.merkurcasinouk.com/>

Here you can find help if anything has affected your experience, submit feedback, and manage the status of your complaint.

Alternatively, you can reach us:

- In writing:
Customer Care,
MERKUR Casino UK,
Seebeck House,
1A Seebeck Place,
Knowlhill,
Milton Keynes,
MK5 8FR
- By phone:
01908 351265 (Please note this an automated phone service)

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POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful.
- prepared with a sense of responsibility to consumers and to society.
- respectful to the principles of fair competition generally accepted in business.
- not intended to bring advertising into disrepute.

Specifically we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise.
- advertisements and promotions are socially responsible and do not encourage excessive gambling.
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- advertisements are not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old.
- persons shown gambling are not, nor do they appear to be, under 25 years of age.
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer.
- advertising and promotional material carries a reference for the need to keep gambling under control.
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.

MARKETING AND PROMOTION

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is: -

- A. dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled.
- B. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

PROCEDURE

All Marketing and Promotions must be compliant.

All Marketing and Promotional activities must be approved by one of the following Managers relevant to the site.

For Bingo Sites

- Operations Director
- General Manager
- Marketing Manager

For AGC's

- Operations Director
- Marketing Manager

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. It is illegal for any person who is under 18 years of age to be permitted entry to any Licensed Premises.

PROCEDURE

- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Licensed Premises.
- Any person known to be under 18 years of age will be refused entry.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry or when it comes to the attention of staff. Members of staff are trained to 'think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. If at any time there is suspicion of forged documents these incidents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card, Validate and the Government's own Connexions card); a driving license (including a provisional license) with photograph, or a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.

- Any attempts by under-18s to enter the premises or designated area(s) are brought to the attention of the Duty Manager immediately and recorded as an entry on a IHL SMART Tablet. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s attempting to gamble in an adult-only environment, and under-18s are not allowed to retain any prize.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- In instances where a child or young person repeatedly attempts to gamble on premises or in designated area(s) restricted to adults, or where repeated oral warnings have been issued, consideration will be given to reporting the matter immediately to the Gambling Commission and, where appropriate, police or local education welfare department.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log.

Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

COMPLIANCE

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in: -

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

IT IS STRICT COMPANY POLICY THAT: -

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Licensed Premises are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.

REMEMBER reporting an Interaction is **NOT** the same as reporting an Incident. An Interaction is a conversation with a customer in regard to their gambling behaviour.

POLICY

The Company recognises its responsibility 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 provision 3.4.1.

The Company makes use of all relevant sources of information to ensure effective customer interactions in particular, to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder.

Customer interaction consists of the following 3 parts:

PROCEDURE

PART 1 - Identify and observe – behaviour or activity you have spotted or something the customer tells you.

PART 2 - Interact and take action – contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3 - Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

The above 3 parts may include the following:

- Behaviors may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, excessive time and money spent, damage to property, violence or the threat of violence to staff or other customers.
- Staff are aware of where customers can be directed for confidential advice should they be approached by them for help or when they identify signs of gambling harm. This includes the Staying in Control information leaflet which includes GamCare Helpline details and the Playright App to control their spend/time.
- Members of staff are trained to guide customers through the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained and T&C's provided to the customer.
- The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations involving aggressive behaviour, contact police for assistance. Any interaction that results in an incident of this type, whether police attend or not must be recorded on the SMARTIncident App on IHL tablet.
- All venue staff should be aware of those customers that are frequent visitors or deemed to be regular players. Monitoring and interaction needs to take place with these customers during their visits. An interaction may lead to the Duty Manager having to intervene or take appropriate action, possibly using the Machine Administration Reconciliation System (MARS), which provides the data to review the spend/play on most machines, for those customers deemed to be potentially at risk. Appropriate action would then be taken on a player by player basis.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.
- All Customer Interactions must be logged on the IHL SMART Tablet.
- Members of staff are trained as part of their 3 month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.

POLICY

Whilst most customers are able to enjoy and manage their gambling, MERKUR Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period of time, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme, referred to as MOSES.

If a customer wishes to self-exclude this can be actioned immediately by a member of the MERKUR Slots venue team via the SMARTExclusion App on the IHL Tablet.

Please note: you will need a Wi-Fi connection in order to access the IHL SMART Tablet.

PROCEDURE - Using the SMARTExclusion Tablet

When a customer has requested that they wish to be refused entry to our premises, the customer and the member of staff will formally acknowledge and document their request on the SMARTExclusion tablet. For further information please refer to the "SMARTExclusion User Guide" available at the venue.

Self-exclusion is sector specific:-

- **AGC Licensed Premises** - 0.25km – 1km exclusion zone
- **BINGO Licensed Premises 'Traditional Bingo Clubs'** – National exclusion zone
- **BINGO Licensed Premises 'High Street'** - 0.25km – 1km exclusion zone

Therefore, you need to know what type of Premises Licence you hold at your venue. It will either be ADULT GAMING CENTRE PREMISES LICENCE (AGC) or BINGO PREMISES LICENCE - the premise licence is displayed on the Information Board. The tablet is set up to select your sector type by default, either AGC or BINGO. You will need to explain to all customers who wish to self-exclude, that it is sector specific and that they need to visit other establishments in their local area if they frequent other premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses in order for them to self-exclude from ALL gambling premises.

Please Note: the staff member dealing with the self-exclusion process should make the customer aware that if they self-exclude from a Slots Venue with a Bingo Premise Licence, they will be self-excluded from all Traditional Bingo clubs in the UK.

The customer must be Informed that this self-exclusion does not Include MERKUR Slots on-line (MERKURslots.com or MERKURcasino.com). The above is detailed in the Self-exclusion Terms & Conditions - the customer will receive a copy upon activation of their self-exclusion - a copy of these are held in the Compliance and Social Responsibility Manual.

The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The SMARTExclusion tablet has a built-in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders and must be forward facing – please ensure the background is light so the image is clear. Do not use a photo of a photo or ID document.**

The member of staff will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

It must be made clear to the customer that they may not revoke the self-exclusion during this time and that they are entering a voluntary agreement.

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and an electronic notification will be sent to other relevant licensed premises.

Any customer held on our membership system that chooses to self-exclude will be removed from all marketing activity during their self-exclusion period.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area from any operator and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.

Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 month 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period the photo will automatically disappear and be archived (with the exception of Traditional Bingo Clubs who retain the details for a longer period of time unless the customer reinstates).
- Exclusions in the 24 hour 'cooling off period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24 hour period.

If a customer tries to enter a relevant gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button

A red rectangular button with the text "REPORT BREACH" in white capital letters.

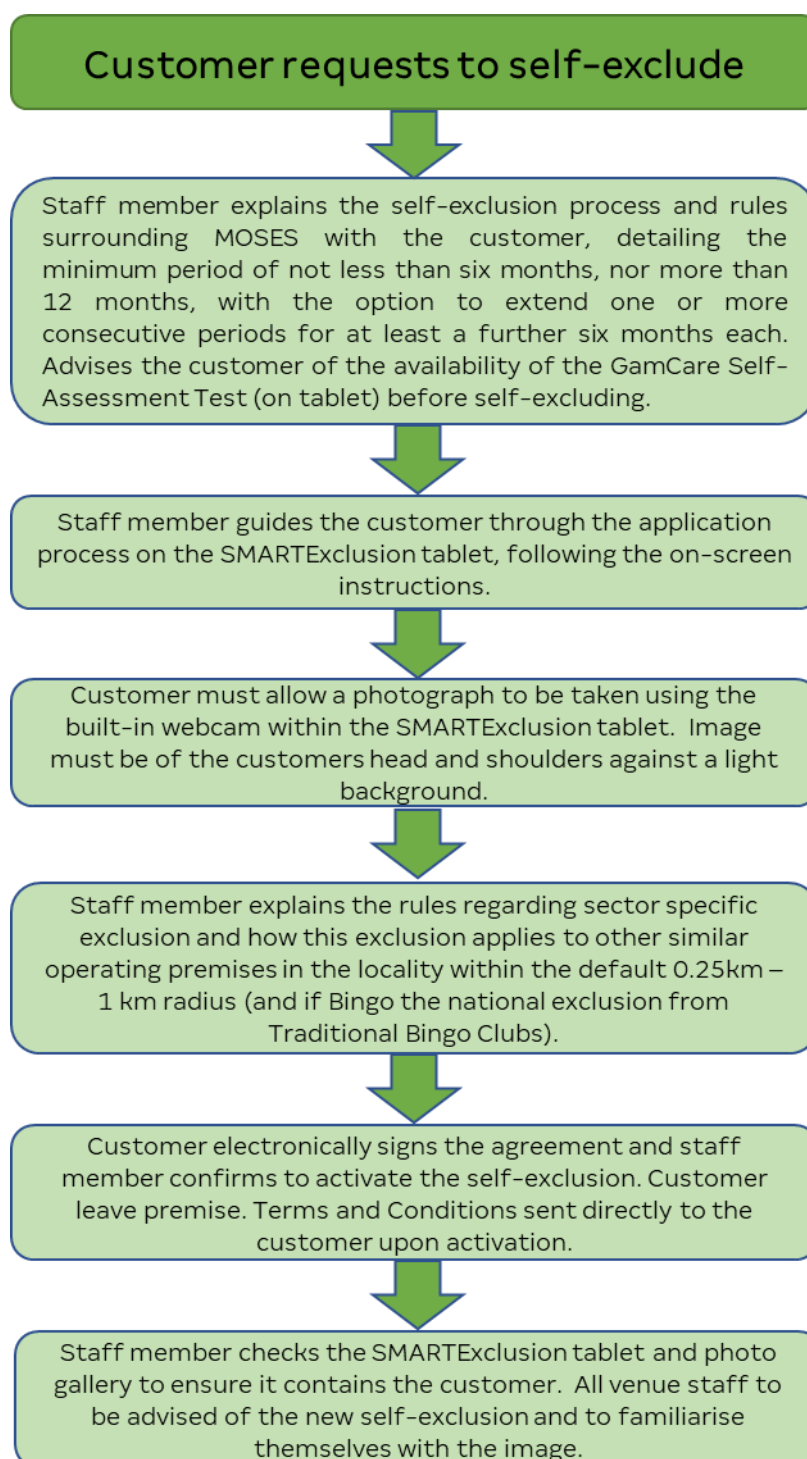
When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion period.

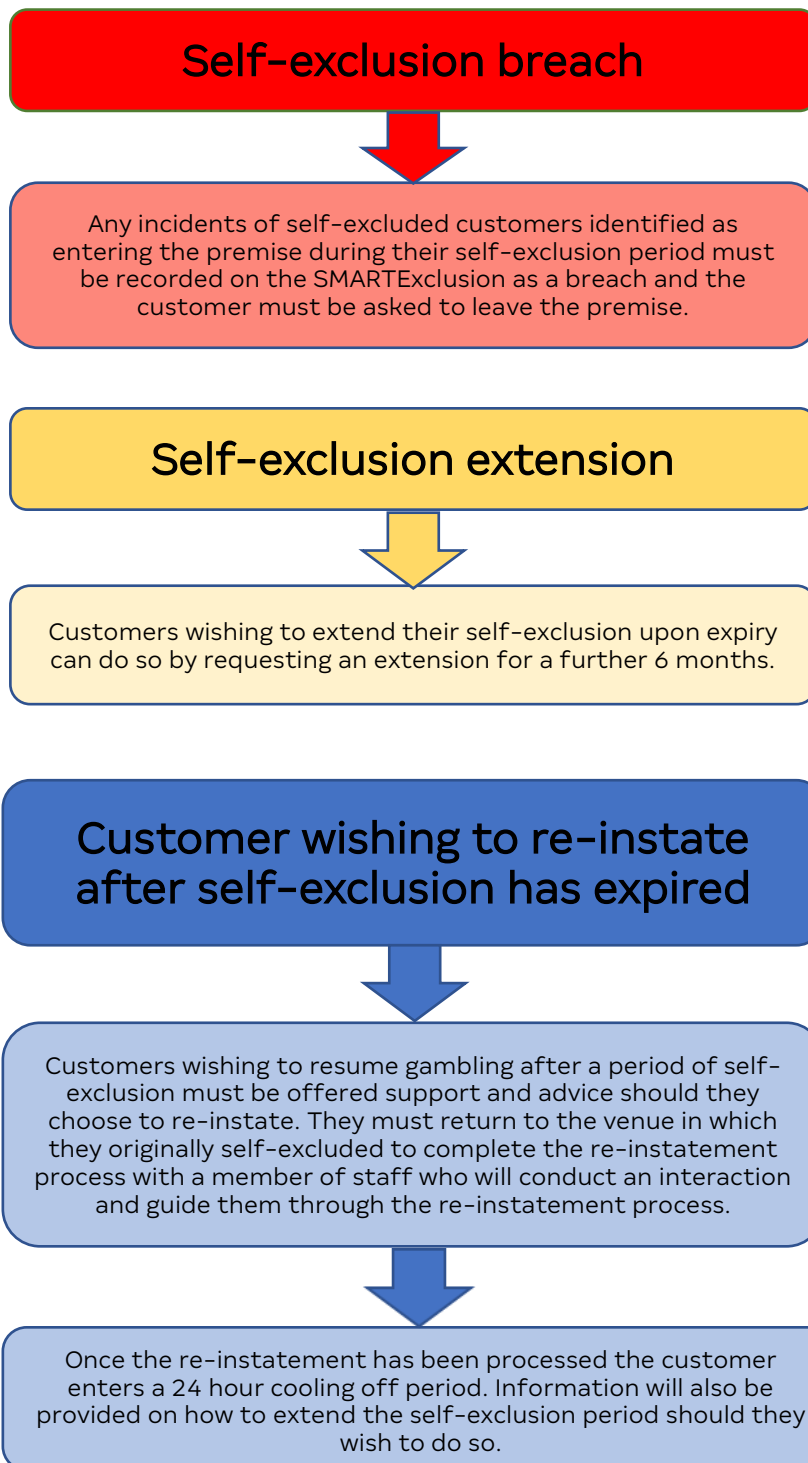
A green rectangular button with the text "REINSTATE CUSTOMER" in white capital letters.

If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the button on the tablet.

A yellow rectangular button with the text "EXTEND EXCLUSION" in black capital letters.

SELF EXCLUSION PROCEDURE FLOWCHART





For full operating instructions for the SMARTExclusion tablet please refer to the SMARTExclusion User Guide available in the Compliance Manual at your venue.

STAFF TRAINING

For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: **dummy**

Last Name: **test**

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

SMART Tablet malfunction

If for any reason your SMART Tablet is unavailable for use due to malfunction please contact IT Support immediately who will investigate and resolve the issue. ITSupport@MERKUR-casino.com

Should a customer wish to self-exclude and your tablet is not available due to malfunction please complete the Manual Self-Exclusion request form with the customer and send immediately to Amanda Kiernan, Head of Compliance who will contact the customer for an image and ID Verification to activate the self-exclusion.

SMART Tablet theft – please contact IT Support immediately who will ensure the tablet is deactivated and a replacement arranged.

Terms and Conditions

Welcome to SmartEXCLUSION – Please note, if you selected to be excluded from an Adult Gaming Centre (AGC), High Street, MSA/Airport or Holiday park or Bingo High Street or Holiday Park then your exclusion data is currently shared with the operators using SmartEXCLUSION. A list of Operators and their trading names can be found here [Operator listing \(/operator_listing\)](/operator_listing). There may be other operators in the chosen exclusion zone(s) who are not signed up to the scheme.



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The AGC Industry Self-Exclusion Scheme - SmartEXCLUSION

Anyone wishing to engage in self-exclusion from gambling premises does so of their own volition. By engaging in the self-exclusion process, self-excluders are agreeing to abide by the terms and conditions of that process hereunder;

1. The self-excluder will determine which gambling premises they wish to be self-excluded from.
2. The self-exclusion system will notify all other venues selected by the self-excluder of their inclusion.
3. The self-excluder will determine how long the self-exclusion period lasts; between a minimum of 6 x months and a maximum of 12 x months.
4. Once the self-exclusion request is registered with SmartEXCLUSION, the excluder cannot terminate the self-exclusion before the selected date of expiry.
5. Self-exclusion will continue to be effective for a further 6 x months after the selected expiry date unless the self-excluder informs the SmartEXCLUSION system at the end of the core expiry period that they no longer wish to be self-excluded. If and when they do, a 24 hour 'cooling off' period will elapse before reinstatement can become effective and gambling activity can take place again.
6. During the self-exclusion period employees working in the selected gambling premises will endeavour to identify all self-excluders and prevent them from breaching their self-exclusion, but this cannot be guaranteed. If a self-excluder successfully and/or purposely gains access to gambling premises from which they have self-excluded there is no responsibility or obligations upon the operators of that premise for any actions of the self-excluder whilst on those premises.
7. In the event that a self-excluder enters a selected gambling premise during the self-exclusion period they will be required to leave the premise immediately. Self-excluders in breach of these terms will, if necessary, be removed by the use of reasonable force.
8. The self-excluder can only be self-excluded from land bases premises and not from UK online gambling platforms. The self-exclusion scheme for online operators can be found at www.gamstop.co.uk. By completing the self-exclusion via Gamstop the system will notify all online gambling companies licences in Great Britain of their inclusion. Any withdrawable funds will be returned to you following the online operator's policies.

SmartEXCLUSION includes a register of individuals who have chosen to self-exclude from entering specific gambling premises. In order to support the individual with their self-exclusion, staff working in those gambling premises need to be able to identify the excluder and to notify other selected gambling premises using the information they have provided.

1. The self-excluder will provide the following information, where applicable, to be recorded onto SmartEXCLUSION;
 - A passport style photograph, which can be taken at the point of self-exclusion in the premises.
 - Vehicle details including registration number.
 - Confirmation of home address
 - Mobile number or Email address



All self-exclusion registrations and the details provided will be recorded onto a database maintained by SmartEXCLUSION.

3. Personal details and a photograph will be kept by SmartEXCLUSION and used by selected participating AGC's to support the exclusion.
4. In order to support self-excluders to maintain their exclusion, photographs will be available and displayed on tablet devices in the selected premises to help with observation and detection. However, it is the sole responsibility of the self-excluder to refrain from entering any of the selected premises for the duration of the self-exclusion period.
5. The details of all self-exclusions will be retained by SmartEXCLUSION for a period of up to three years beyond the expiry of the self-exclusion period.
6. SmartEXCLUSION has a legal obligation to record and report all interactions with self-excluders, including breaches or attempted breaches. These records have to be made available to those gambling premises selected during registration, and also to the UK Gambling Commission.

The Operators of SmartEXCLUSION and the gambling premises selected for the purpose of self-exclusion will take all reasonable steps to refuse admittance or otherwise prevent self-excluders from gambling. However, it is the responsibility of the self-excluder to ensure that they do not enter any gambling premises, or ask anyone to gamble on their behalf during the self-exclusion period.

Retention of Winnings

You acknowledge and agree that in the event that you breach or circumvent your self-exclusion request during your self-exclusion period you will not be entitled to receive winnings.

Deposited Funds

If you have any funds deposited on any electronic device on the premises at which you have self-excluded, these will be returned to you in accordance with the operator's usual policies.

Data Protection

I acknowledge that in order to process my request for self-exclusion I may be required to disclose personal details about me, including providing a photograph. I will be asked for sensitive personal data about my decision to self-exclude and the reason for reaching it. SmartEXCLUSION and its members may make use of NON personal data for the purpose of statistical analysis on problem gambling, which may be shared with governing bodies like the Gambling Commission and Responsible Gambling Trust. Neither SmartEXCLUSION nor its members will share or sell personal data to third parties.



The Bingo Industry Self-Exclusion Scheme



Your Commitment to Self-Exclusion

By requesting to proceed with the self-exclusion process, you agree to provide full and accurate personal details, now and in the future, to enable bingo operators who are members of The Bingo Association (BA) to prevent you from accessing and/or gambling on their premises. A list of premises which are part of this self-exclusion scheme can be found on The Bingo Association's website: www.bingo-association.co.uk (<http://www.bingo-association.co.uk>)

Some members of The Bingo Association operate a self-exclusion scheme based on locality which may include other gambling sectors, these premises are identifiable on the list on the BA website.

The details relating to your self-exclusion and any image provided will be held on the BA's self-exclusion non-public secure database for the duration of your self-exclusion. Reasonable checks and safeguards will be undertaken to ensure that whilst you are self-excluded, you cannot access or gamble at any BA member premises.

Once you have requested self-exclusion, BA members will use all reasonable endeavours to comply with your self-exclusion request. However, by signing the self-exclusion agreement you also declare and accept that you are responsible for your actions and will not seek to circumvent your request to self-exclude by attempting to gain access to or gamble at any BA member premises or to use any online gambling service that you have similarly requested self-exclusion from during this application process.

Accordingly, the BA, the operator of the bingo premises at which you have submitted your request to self-exclude and all other members of the BA accept no responsibility or liability for any consequences or losses, however caused, that you may suffer or incur:

- If you continue to gamble
- If you have provided misleading, inaccurate or incomplete details
- If you successfully circumvent your self-exclusion

Retention of Winnings

You acknowledge and agree that in the event that you breach or circumvent your self-exclusion request during your self-exclusion period you will not be entitled to receive winnings which may, at the discretion of the BA and/or the operator of the premises at which you breach your self-exclusion, be re-distributed to other players at the club or be given to a charity.

Deposited Funds



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If you have any funds deposited on any electronic device on the premises at which you have self-excluded, these will be returned to you in accordance with the Club's usual policies.

Processing your request

The premises from which you self-exclude will take reasonable steps to promptly process your self-exclusion request and to notify the BA and other BA members of your decision. You should be aware however, that it may take up to seven days for other bingo companies to implement similar changes to their systems. You acknowledge and agree that neither the BA nor the premises from which you initiated your self-exclusion nor any other BA member will be held liable to you or any third party, if you successfully breach or circumvent your self-exclusion request or if any marketing material gets sent to you.

Online Self-Exclusion

Self-Excluding in a Bingo licensed venue does not exclude you from UK online gambling sites. The self-exclusion scheme for online operators can be found at www.gamstop.co.uk By completing the self-exclusion via Gamstop the system will notify all online gambling companies licensed in Great Britain of their inclusion. Any withdrawable funds will be returned to you following the online operator's policies.

Counselling and Support Services

Problem gambling information will be available to you at your self-exclusion interview. The BA also provides factsheets within The Bingo Association's Operators' Handbook with details of a selection of national counselling and support services. Please ask the Duty Manager of the premises where you self-excluded if you wish to receive these factsheets.

GamCare is the national association for gambling care, educational resources and training and provides information, advice and counselling to individuals, their family and friends, who have concerns about problem gambling. The Helpline number for GamCare is 0808 8020 133 (tel:08088020133) and their e-mail address is: info@gamcare.org.uk ([mailto://info@gamcare.org.uk](mailto:info@gamcare.org.uk)). Help can also be found on the gambleaware website: www.gambleaware.co.uk (<http://www.gambleaware.co.uk>)

Reinstatement

You will not under any circumstances be permitted to terminate your self-exclusion agreement before the end of the period that you have applied for. At the end of your self-exclusion period, including any extension to the period that you may subsequently make, the self-exclusion remains in place for a further six months unless you take positive action in order to gamble again. To do this, you must complete the Reinstatement Request Form. You may make this request at the end of your period of self-exclusion or at any time during the six month period following this. Once a request to reinstate has been received by a club, a 24 hour cooling-off period will be enforced.

If you do not request re-instatement, your period of self-exclusion lapses on the expiry of six months after your self-exclusion agreement ends. You may then be able to gamble again, should you choose. Nevertheless, some companies may additionally and independently ask you to formally request reinstatement if your self-exclusion has lapsed. No marketing material will be sent to you unless you request it as part of the reinstatement process.



I acknowledge that in order to process my request for self-exclusion I may be required to disclose personal details about me, including providing a photograph. I will be asked for sensitive personal data about my decision to self-exclude and the reason for reaching it. The BA and its members may make use of NON personal data for the purpose of statistical analysis on problem gambling, which may be shared with governing bodies like the Gambling Commission and Responsible Gambling Trust. Neither the BA nor its members will share or sell personal data to third parties.



MANUAL SELF-EXCLUSION REQUEST FORM (Only to be used should the SMART Tablet malfunction)

Site Name:

Site Address:

Customer Name:

Customer Date of Birth:

Customer Address:

.....

.....

Customer Mobile Number:

Customer Email Address:

Start Date:

I request that I be refused entry to the following MERKUR SLOTS venues:

.....

.....

.....

.....

for a period of 6 or 12 months* (Customer to specify) *..... (minimum six months/maximum 12 months)
from the date of signing and acknowledge that I am not allowed to rescind my self-exclusion during this period.

I understand that I will be contacted within 24 hours to provide a photograph of myself and further ID verification for GDPR purposes to enable the self-exclusion to be activated.

Signed : (Customer) Date:

Witnessed : (Duty Manager) Date:

Upon completion of the above verification this self-exclusion application will be entered onto our IHL SMART Exclusion system and the Terms and Conditions of the self-exclusion agreement will be sent directly to confirm activation.

You will be contacted within 24 hours by a member of the Compliance department to complete your self-exclusion if you have not been contacted within 24 hours contact us via MERKUR Customer Care
<https://customercare.merkurcasinouk.com/index.php>

Once the term has elapsed (minimum 6 months/maximum 12 months), the customer needs to inform the Duty Manager that they wish to re-instate. The customer must then wait a further 24 hour period before they are permitted to gamble.

OFFICE USE ONLY

Instructions: To be completed by the Duty Manager:

- Hand a copy of this completed form to the customer
- Scan/email a copy to the Head of Compliance
- DO NOT obtain photographs or retain copies of ID documentation
- The original copy must be retained securely then shredded once Self-Exclusion is active on the SMART Tablet

SOCIAL RESPONSIBILITY & CODES OF PRACTICE PREMISES LOGS



Age Verification app – all ID checks for customer(s) you suspect being under the age of 25 are to be recorded on the tablet (remember we operate a Think 25 policy).



SmartINTERACTION app – If you are approached by a customer, or you instigate a conversation with regards to “AT RISK” customers who may have a **gambling problem**, if you offer “Staying In Control” Leaflet, and discussions regarding self-exclusion, you need to record the incident on the tablet.



SmartINCIDENT App – the app should be used to record all incidents types 1-6 as listed below. You can view this information by selecting “View Incidents” and “incident Type” on the tablet.

Listed below are the incident types on the tablet. Further information can be recorded by selecting the drop down box.

Incident Types:

1. Incident relating to aggressive behavior
2. Incident relating to barred or previously barred customer
3. Incident relating to alcohol
4. Incident relating to drugs
5. Incident relating to disturbance inside / outside / near premises
6. Venue Staff Training (Training Only)



SmartEXCLUSION On the IHL tablet, to be completed if a customer wishes to self-exclude. Ensure all staff check the tablet daily at the start of each shift to familiarise themselves with any new photos which will appear in the top left hand corner of the photo carousel for new self-excluded customers, as the tablet will update automatically each day! Please refer to the Self Exclusion Policy page 7.4 in the Compliance folder for staff training information.

A copy of all User Guides for the tablet are available in your Venue Floor Folder for reference purposes.

You can also view and download these documents on Upskill > Knowledge Base > Categories

Compliance Policy

Why:

The responsibility for an individual's gambling is their own. The responsibility to exercise a duty of care is that of the operator. Merkur Gaming recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

Best Result:

All employees are fully aware of the importance of following policy and processes in regards to compliance and social responsibility. The business is run in line with the license conditions and codes of practice at all times and all employees work together to ensure the 3 licensing objectives are met.

Worst Result:

Employees are not aware of the policy and processes in regards to compliance. The company is not operated in line with the 3 licensing objectives and the license conditions and codes of practice. The business is put at risk of its license being lost.

The 3 licensing objectives:

- **Keep crime out of gambling**
- **Ensure that gambling is conducted in a fair and open way**
- **Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling**



What:

- Employees must complete compliance training before being able to work with customers in any venue
- It is the responsibility of the Lead Supervisor to ensure that all employees are correctly trained and up to date with compliance training
- It is the responsibility of employees to check that they have completed all relevant compliance training on their inform people/upskill account regularly
- Employees must always follow the policies and processes in regards to compliance which are found in the Compliance and Social Responsibility folder

When:

- The policies and processes which form compliance and social responsibility apply at all times of operation.

Who:

- All employees have a responsibility to ensure that the business is operated in a way which is compliant at all times.

Related / supporting documents:

- The compliance and social responsibility folder.

Order of who to contact if in need of help / advice:

- Lead Supervisor
- Cluster Manager
- Compliance Manager

CCTV Policy

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Camera angles are never changed without the correct authority. The security of the venue is increased

Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorization causing a loss of coverage of key areas. The security of the venue is compromised

What:

- The CCTV system should be switched on and recording at all times.
- Any faults with the CCTV System should be communicated to your Cluster Manager immediately and the IT department.
- CCTV should always cover: The front and rear exits, All machines, The offices and The GeWeTe
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct.
- Information in regards to the CCTV should never be disclosed to any 3rd parties.
- Placing and adjusting of the cameras should only be completed by IT with authorisation from AM/OD.
- Records should be kept to show who has access to the CCTV password and username.
- Decorations should be not placed in areas which obscure the CCTV monitors
- The CCTV should be in a security cabinet
- The key to the Security Cabinet to be locked in the Key Cabinet

When:

- The CCTV should be checked daily to ensure correct function.

Who:

- The Lead Supervisor has responsibility for the CCTV system being checked and fully functional.

Order of who to contact if in need of help / advice:

- Cluster Manager.
- Commercial Administrator

Staff Guard / P.A Policy / Static Alarm

Why:

The security of employees is of the utmost importance; therefore personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention.
- Staff guard should be tested at least once per week – Recorded on MC141 (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- **Employees should not be hesitant to use staff guard** – This is a service which we pay for, there are no issues with false alarms or over usage. Use as often as necessary.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.

- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system.
- For Static alarms ensure that the reset key is available at all times.

When:

- The staff guard unit should be tested once per week.
- The staff guard unit should be activated whenever staff are feeling uncomfortable or threatened.
- The MPA system should be used only when immediate police assistance is required

Who:

- The MPA unit and/or Staff guard fob should be carried by employees at all times.
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices.

Related / supporting documents:

- MC141 – Staff guard test record

Order of who to contact if in need of help / advice:

- Cluster Manager
- Commercial administrator
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours Out of hours, the number transfers straight to an engineer so he may be woken by the call Do not press the fob if you have maintenance issues – dial this number as directed)

How:

To operate the Staff Guard unit:

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER SAY:

CALL THE MANAGER - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: "**Stand By**"

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say "**Standing by**" every few minutes to assure/remind you that they are still there.

Say: "**Stand down**" once you no longer need



How to make a test call:

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call



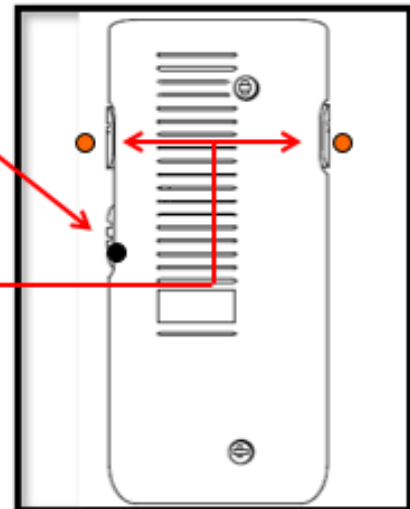
MOBILE PANIC ALARMS (MPA)

Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

1. Slide the black button downwards to unlock the orange buttons
2. Press the two orange side buttons together

The panic alarm does not work if you press only one button

The black button should be kept in the locked position to prevent false activations



HOW IT WORKS

The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

CAUTION – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

WHEN TO USE

MPA's should only be used when there is the threat of serious injury to staff or customers.

Example of when to use;

- ✚ Any physical violence is carried out towards a member of staff or customer;
- ✚ When the threat of physical violence is considered imminent; or
- ✚ The site is subject to a robbery.

At all other times ring the police directly. The number is displayed on the office notice board.

PROBLEM SOLVING

Any problems with the MPA should be addressed to your Line Manager who will inform the Commercial Administrator.

HOW TO TEST YOUR MPAs

1. Call your alarm supplier, a list of numbers is provided below.
2. Tell the alarm operative you want to test your MPAs, give them your site name (Merkur Slots), site address and site password.
3. The alarm operative will then tell you that they have disconnected the signaling, at which point you will be asked to activate each MPA in turn.
4. For example; you will press MPA 1 when instructed to by the alarm operative and they will tell you if a signal has been received, you will then move on to MPA 2 and the alarm operative will tell you if a signal has been received, you will then move on to MPA 3 etc. etc.
5. You will do this until all of your MPAs have been tested.
6. After each individual MPA test, the alarm operative will tell you if the signal has been received or not. If not, your MPA is faulty and will need to be repaired or replaced. In this instance, please report it to the Commercial Administrator straight away.
7. You will need to log that you have carried out an MPA test on your MPA Test Record Sheet, which should be maintained in your Premises Log in your Compliance Folder.

| Alarm Provider | Contact |
|----------------|------------------------|
| JUSTICE | 08452570090 |
| ABEL | 0844 800 3022 |
| METRO | 0115 983 38011 |
| GEM | 0844 879 1703 |
| CHUBB | 0344 879 1730 |
| ADT | 0344 800 1999 option 5 |
| LSG | 08452000088 |

WHAT TO DO AFTER YOUR MPA TEST/ACTIVATION

When the MPA testing exercise has been completed the alarm company will reactivate the signaling and the police response will be reinstated.

You will then need to reset your alarm control panel.

If you have a fob operated system, press your fob against your keypad, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately hold your fob up to the keypad once again to unset the system. Your system will now be reset.

If you have a code operated system, input your code, as if you are going to set the system for closure. The keypad will ask you if you want to set the system. Press 'yes'. The system will start to arm, so immediately input your code, as if you are opening and this will unset the system. Your system will now be reset

Smoking / Vaping Policy

Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore to remain compliant with the law smoking should only be permitted in designated areas for employees and customers alike.

Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law. Employees found smoking inside the premises may face disciplinary action.

What:

- Smoking is strictly prohibited within venues
- Customers should not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no smoking area at the back of the venue, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees are not permitted to vape while on shift and therefore must take designated breaks to vape as smokers do. Employees must not vape in the venue.
- Employees who smoke / vape must cover their uniform while smoking and when possible smoke separately from customers
- No smoking signs should be clearly displayed

When:

- It is illegal for anyone to smoke inside the premises at any time.
- This policy is applicable at all times.



Who:

- This policy relates to both employees and customers.
- All employees are responsible for ensuring that this policy is followed at all times.

Order of who to contact if in need of help / advice:

- Lead Supervisor
- Cluster manager
- Area manager



SMOKEFREE

ACCEPTABLE PROOF OF AGE DOCUMENTS INCLUDE

MILITARY ID CARD



ANY IDENTIFICATION CARRYING THE 'PASS' LOGO



DRIVING LICENCE WITH PHOTOCARD



PASSPORT



The law states that licensees must only accept Identification which:

1. The ID contains a photograph from which the Individual can be identified
2. Clearly states the Individuals date of birth
3. Is valid
4. Is legible and has no visible signs of tampering or reproduction

Machine Fraud Policy

Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place and what to do in the event of spotting a “customer” defrauding a machine.

Best Result:

All employees are aware of the policy in regards to machine fraud and what to look out for. Machine fraud is reduced and the income for the business protected.

Worst Result:

Employees fail to identify fraud taking place resulting in loss of income. Further venues are targeted. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended.
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the Cluster manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security address with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster.

When:

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected.
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees.
- Customers with their hands over the coin mechanism, display or pay out tray.

- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray.
- Customers leaving the venue with machines still having money left in the bank.

Who:

- All employees have a responsibility for protecting the business from machine fraud.
- The Cluster manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place

Order of who to contact if in need of help / advice:

- Lead Supervisor
- Cluster Manager
- Area Manager

How:

If you suspect that machine fraud is taking place either:

- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police.
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick.
2. This information should be provided by email to security@merkur-casino.com as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event.
4. Income protection should be informed.

Machine Ratio Check Policy

Why:

The quantity of B3 Machines which a venue is permitted to have is limited, in general to 20% of its total machines. Checks need to be completed to ensure that at all times every venue operates within its correct ratio.

Best Result:

The Machine Ratio Check policy is completed and the venue complies with legislation and operates within the legal ratio for B3 Machines.

Worst Result:

The Machine Ratio Check policy is not completed and the venue operates more B3 machines than it is legally allowed.

What:

- MC105 should be completed
- Completed MC105 should be emailed to Incomeprotection@praesepeplc.com

When:

- After any Machine Move.
- When any Machine or Tablet is reported as out of order and not repaired on the next visit by the Service Engineer.

Who:

- The Duty Manager at the time of the move/removal.

Related / supporting documents:

- MC105 Machine Ratio Check Record.

Order of who to contact if in need of help / advice:

- Area Manager
- Income protection
- Gaming Machines.

How:


Complete the MC 105 Machine Ratio Check Record

MACHINE RATIO CHECK RECORD

Venue Name

Date of Move

Name



Venue No

Week No

Signature

AREA 1 - MAIN

Total number of B3 Machines

Total number of Cat C Machines

Total number of Cat D Machines

Total No of Cat C/D Tablets

Total No of Twin player Infills (count as 2 machines)
(do not include any Class 2)

Total a

Total number of B3 allowed legal ratio - (a) divided by 5 b

Total number of B3 Machines (b) actual count c

Total number of actual B3 (c) must not exceed number allowed

AREA 2 - SUB DIVISION

Total number of B3 Machines

Total number of Cat C Machines

Total No of Cat C Tablets

Total No of Cat C/D Tablets

Total No of Twin player Infills (count as 2 machines)
(do not include any Class)

Total a

Total number of B3 allowed legal ratio - (a) divided by b

Total number of B3 Machines (b) actual count c

Total number of actual B3 (c) must not exceed number allowed

Walk around the venue and complete all the relevant sections with the correct number of machines in the main area of the venue

This form must be emailed to IncomeProtection@praesepeplc.com

If your B3 actual total exceeds the allowed legal ratio you must contact your Area Manager immediately and email this form to gamingmachines@praesepeplc.com

Confirm action taken:

Complete all relevant sections with correct number of machines if the venue has a 2nd licensed area

Email Completed document

MC105-V1

MARKETING CODE OF PRACTICE

A GUIDE TO GETTING OUR ADVERTISING AND PROMOTIONS RIGHT – EVERY TIME!

The Marketing Department provides an annual programme of National activity. All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider. HOWEVER, occasionally 'local' activity may be requested from you. All 'local' activity should be cleared through the Marketing Department. This will ensure we are always:

LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and **MUST NOT** be misleading or indecent.
2. All our advertising and promotions must be socially responsible and **NOT** promote gambling for financial gain.
3. All our advertising and promotions must be **TRANSPARENT** and clearly state the offer and any requirements or conditions applied to obtaining it.
4. Any terms or conditions related to the offer, including offer end dates **MUST BE** displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials.
5. Any printed literature, display or point-of-sale material **MUST** contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo.
6. Advertising and promotions **MUST NOT** be targeted at, or exploit children, or those vulnerable to gambling. The law states:
Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.
7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age.
8. **DO NOT** make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state **NO PURCHASE NECESSARY** (even if for charitable causes).
9. **DO NOT** present offers which reward extended play or incentivise disproportionate stake levels.
10. **ALWAYS** communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words:

GUARANTEED JACKPOT WINS FOR EVERYONE! ❌

PLAY THIS AND DOUBLE YOUR MONEY! ❌

YOU WILL WIN A FORTUNE! NO TERMS AND CONDITIONS ❌

BEST BEFORE END ✔️

OVER 18 ONLY 18 ✔️

18 ✔️

THINK 25 ✔️

FREE TO ENTER? ✔️

PLAY LONGER WIN MORE ❌

✔️

LEGAL - DECENT - HONEST - TRUTHFUL

IMPORTANT: All local promotions are required to be run through the Marketing Department.

18+ BeGambleAware.org



PLAY SENSIBLY

PLAY ENJOYABLY

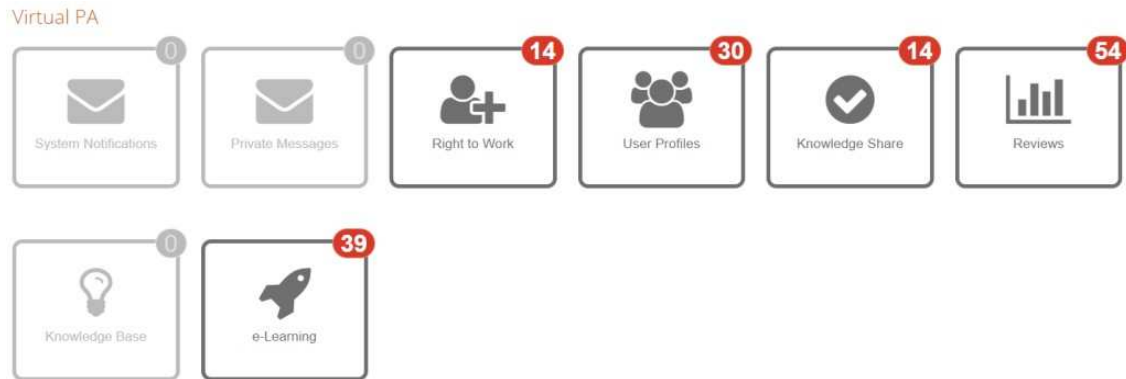
PLAY AFFORDABLY



MERKUR SLOTS

Introduction to e-learning

All your e-learning sits in your 'Virtual PA' and you access it through the e-learning tile as below:



EVERYONE who works in one of our venues, (Merkur Slots) must complete various training modules to ensure they understand our industry and area of compliance.

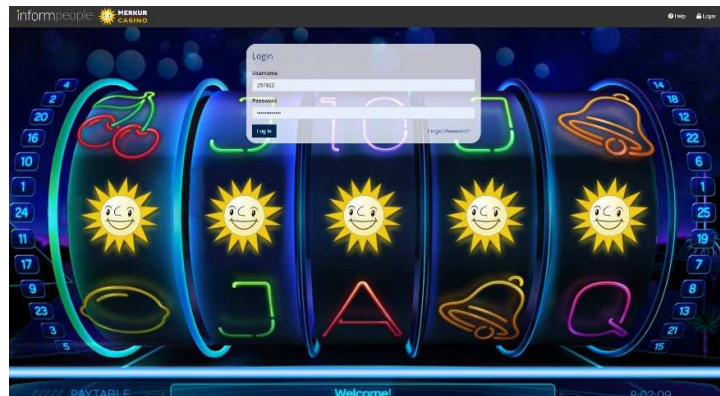
You will have an element of e-learning and various modules to complete every day during your first two weeks of your induction.

We know this looks a lot, but you must understand the ethos of the Gaming Industry, that compliance is a legal requirement and how it is used day to day in your role and your venue.

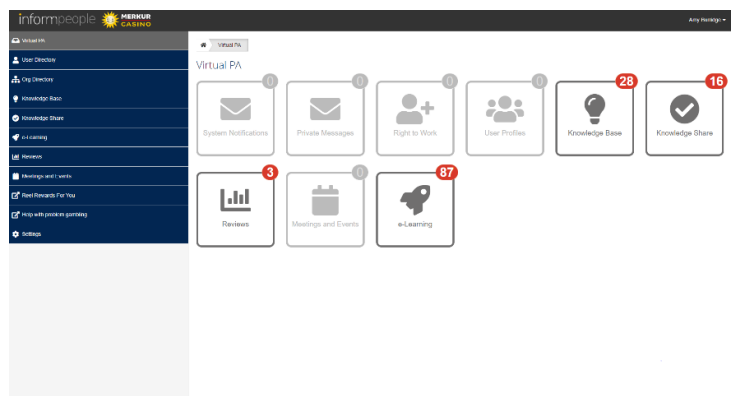


BEFORE YOU CAN START TRAINING OR WORKING IN VENUE **YOU MUST COMPLETE** YOUR COMPLIANCE TRAINING!

**LOG IN TO THE
INFORM
PEOPLE SYSTEM**



**SELECT THE
e-LEARNING
TAB**



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Complete these **three** courses:



**Essentials of
Compliance and
Social
Responsibility**



Age Verification



**Safeguarding Children
And Vulnerable People**

Merkur Slots

Training Plan

CCTV & Security

V6 01 22

When working in the venue you need to have full awareness and understanding of all security policies, ensuring they are adopted at all times, as this will have an impact on your safety, our customer's safety, and the security of our venue.

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers, that all areas of the venue are covered by CCTV at all times.



Please refer to the Operations Manual for all security full policy



Your training buddy will help bring all security policies to life with you in the venue.

Module 3- Gaming machines



Modules covered

- Introduction
- TiTo
- Product & Brand Knowledge
- Cleaning Gaming Machines
- Machine Maintenance & Fault reporting



e-learning to complete

- Essentials of compliance
- Safeguarding the vulnerable
- Age Verification

above completed at Induction



Policies to read

- CS9/01 Machine Presentation - section 2
- M01/01 Machine Breakdown -section 4
- M02/01 Venue Presentation - Section 4
- M03/01 Ticket Refill Policy - Section 4

Please ensure you tick off each of the above bullet points that you have completed



Once this module is completed successfully, you will have achieved the skills

required to carry these tasks: **Please ensure you tick off each task that you have completed, when you feel comfortable you can perform them in venue*

- Know how many machines you can have in venue
- Understand the different machines category's
- Gain knowledge on our product & brand
- How our machines should be presented
- Know how to report any faults
- Know how TiTo works, within the venue

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Gaming Machines

In your venue, you will see there are several different types of machines. These range from 10p to play to £2 to play and dependent on which machine the customer is playing, up to a maximum of £500 Jackpot win.

You should familiarise yourself with the different types of machines so you can advise customers, explain the workings and start to become an expert on machines – after all, they are our ‘product’!



Merkur Slots

Training Plan

Gaming Machines

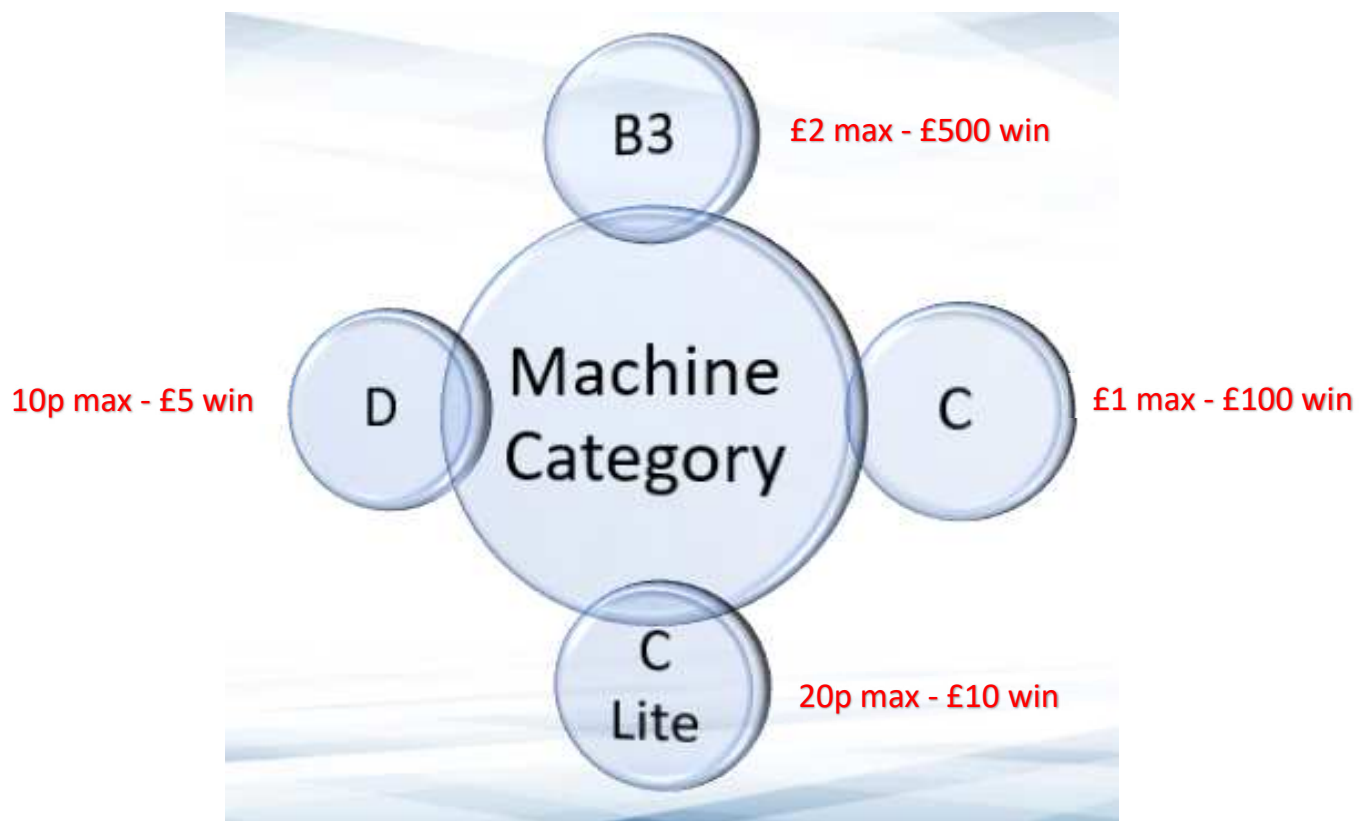
V6 01 22

Did you know?

All Gaming establishments require a premises licence to run gambling activities. This will be located on the Information Board, near to the front entrance.

An AGC can comprise a mixture of the entire machine categories; however, the ratio of B3 cabinets to all the other categories cannot exceed **TWENTY PERCENT**.

For example, an AGC operating with Ten B3 Cabinets must have 40 Cat C/and Ds to operate legally



The following notices are a requirement by law to be displayed on all Gaming Machines in the venue. This can be on the screen of the machine or displayed on a sticker affixed to the cabinet

- **No under 18's to Play**
- **Gamble Responsibly (Gamcare UK Helpline 0800 8020 133)**
- **Minimum Percentage payout**
- **Machine Category – (either Legacy or Non-Legacy)**

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Ticket in Ticket out Machine (TiTo)

Ticket in Ticket Out is a very simple concept and has been introduced throughout the Merkur estate. This has now given us a system that provides full data retrieval and a cashless solution, which assists all departments in the day-to-day running of the business.

All manufacturers conform to the GBG (Gambling Business Group) ticketing protocol, which allows the player to transfer winnings from machine to machine easily and conveniently. In essence, TITO offers a simpler, efficient, and impartial playing experience.

The real advantage from an operational perspective is the reduction of cash handling by automating the manual processes, such as hand pays and floating hoppers with cash. This in turn means more time freed up for customer service.

Whilst a lot of our estate uses Ticket in Ticket out (TiTo), we do still have machines that follow the manual processes. This means that the Gaming Machines will have an agreed float within them. The float will need to be topped up; this is called the refill process. During the collection process, this machine will need to be emptied of all cash, and then the agreed float put back into the machine. If these machines are within the venue you are training in, the training manager will go through this process with you.

Please refer to MARS Manual for guidance



As the technology of our machines is advancing, we need to take advantage of this, with how we operate. We want to reduce and minimise risk to our business, and this can be with inappropriate use of tokens, counting errors before and during the collection, and any other associated errors that can occur collecting tokens.

A Ticket in Ticket Out Machine will in turn minimise time spent on collection, collecting tokens, and issuing tokens, meaning our teams will be able to spend more time focusing on the whole customer experience within our venues.

We also want to minimise the risk of cross contamination within our venues and minimising the need to recycle tokens will help with this.

Merkur Slots Training Plan

V6 01 22



Topics covered

- How to Play Bingo
- How to use the G-Tab
- How to Account for the G-tab



e-learning to complete



Policies to read

- GTab Bingo Manual
- GTab Manual

Please ensure you tick off each of the above bullet points that you have completed



Once this module is completed successfully, you will have achieved the skills

required to carry these tasks: **Please ensure you tick off each task that you have completed, when you feel comfortable you can perform them in venue*

- Understand how to play bingo
- Know how to play the G-Tab
- Understand how to account for the G-Tab

G-Tab 354

As technology progresses, we can increase our choice of product and content to our customers.

One product we use is the G-tab. some venues will have gaming machine content only (G-



How to Play Bingo?

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Merkur Slots Training Plan

V6 01 22

If you are one of the venues that have a bingo license, then it would be helpful to understand how to play bingo, so you can feel comfortable explaining this to a customer should they ask.

Let's take a look at the classic 1-90 bingo game

1. One line - where one line of 5 numbers matches the numbers called

| | | | | |
|----|----|----|----|----|
| 7 | 13 | 37 | 52 | 83 |
| 9 | 20 | 48 | 58 | 64 |
| 28 | 39 | 65 | 73 | 84 |

2. Two-line – where two lines of 5 numbers matches the numbers called

| | | | | |
|----|----|----|----|----|
| 7 | 13 | 37 | 52 | 83 |
| 9 | 20 | 48 | 58 | 64 |
| 28 | 39 | 65 | 73 | 84 |

3. Full House – where all three lines, 15 numbers matches the numbers called

| | | | | |
|----|----|----|----|----|
| 7 | 13 | 37 | 52 | 83 |
| 9 | 20 | 48 | 58 | 64 |
| 28 | 39 | 65 | 73 | 84 |

To win in any of these combinations, the last number called must be part of the winning sequence.

Let's take a look at the 1-80 bingo game (rainbow bingo)

1. One line - where one line diagonal, vertical or horizontal of 4 numbers matches the numbers called

| | | | |
|----|----|----|----|
| 20 | 29 | 43 | 69 |
| 18 | 21 | 46 | 72 |
| 1 | 25 | 44 | 70 |
| 15 | 23 | 54 | 71 |

| | | | |
|----|----|----|----|
| 20 | 29 | 43 | 69 |
| 18 | 21 | 46 | 72 |
| 1 | 25 | 44 | 70 |
| 15 | 23 | 54 | 71 |

| | | | |
|----|----|----|----|
| 20 | 29 | 43 | 69 |
| 18 | 21 | 46 | 72 |
| 1 | 25 | 44 | 70 |
| 15 | 23 | 54 | 71 |

2. Full House – where all 4 columns, 16 numbers match the numbers called

| | | | |
|----|----|----|----|
| 20 | 29 | 43 | 69 |
| 18 | 21 | 46 | 72 |
| 1 | 25 | 44 | 70 |
| 15 | 23 | 54 | 71 |

If the Venues with Bingo Licenses are unable to offer bingo due to technical faults. You should have on-site rainbow bingo tickets. These must be offered at no cost to customers at times you have agreed with your area manager, it is recommended that you play for a full house for £5.

Please email marketing –marketing@merkur-casino.com– for the rainbow bingo tickets and instructions

G-Tab How to play

Merkur Slots Training Plan

V6 01 22

Your training buddy will now demonstrate the G-Tab tablets, including the products are available on the tablets within your venue, (bingo/non bingo).

Please refer to the manufacturer's guide.



G-Tab accounting

Each day you will need to account for the G-Tab, this should be done at the start of the next day.

You will now observe and practice a G-tab daily collection with your training buddy.

You will be able to observe the full accounting procedures during the final collection (this is covered in another module).

Please refer to the G-Tab user guide which can be found on the Cash & Bank system.



Module 6- Systems and paperwork

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Modules covered

- Understanding different logs
- Acronyms & Abbreviations
- Licensing objectives
- Possible more YGAM
- GDPR



e-learning to complete

- Essentials of compliance
- Safeguarding the vulnerable
- Age Verification

**above completed at Induction*



Policies to read

- CM1/01 Compliance Policy - Section 6
 - GDPR on knowledge base
 - Document Retention policy
- Please ensure you have read the Compliance and social responsibility folder in venue**

Please ensure you tick off each of the above bullet points that you have completed



Once this module is completed successfully, you will have achieved the skills

required to carry these tasks: **Please ensure you tick off each task that you have completed, when you feel comfortable you can perform them in venue*

- How to use the Compliance Logs
- How to use the Smarthub (previously referred to as IHL) tablet
- Understand the Licensing objectives and your role in meeting the objectives
- Understand the main acronyms used
- Know how to use customer information
- Can identify a vulnerable person
- What to do with Tito Tickets
- Understand what personal data is and how and when it should be stored and destroyed

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When we think Compliance it can be very daunting and scary as we don't want to make mistakes and get it wrong. Generally, **compliance means** adhering to a rule, such as a

You will have already completed the **3** compliance E-learning Courses:

- Essentials of Compliance and Social Responsibility
- Age Verification
- Safeguarding Children and Vulnerable People



Compliance – Understanding the Different Logs

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INTERNATIONAL CERTIFICATE OF ACCREDITATION

G4

GLOBAL GAMBLING GUIDANCE GROUP

In accordance with the responsible gaming policies, procedures and standards set by the Global Gambling Guidance Group (G4), Amsterdam, the Netherlands, accreditation is hereby granted to:

Merkur Group UK
Merkur Slots, Merkur Cashino, Beacon Bingo
and Blueprint Operations

audit date: 14 December 2020

Certificate Number: EG - 02020
Original Approval: 14 December 2020
Current Certificate: 14 December 2020
Certificate Expiry: 14 December 2023

On behalf of the G4 Foundation:


Jeffrey Derevensky


Pieter Remmers

Vincit qui se vincit

INTERNATIONAL RESPONSIBLE GAMING ACCREDITATION SYSTEM

THINK

25

If you are lucky enough to look under 25 years of age, we need to check your ID.

Please do not be offended.

Acceptable forms of ID are:

Driving Licence, Passport, Citizen Card.

18+ [BeGambleAware.org](https://www.BeGambleAware.org)   

PLAY
SENSIBLY

PLAY
ENJOYABLY

PLAY
AFFORDABLY



MERKUR
SLOTS

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MERKUR SLOTS



No Smoking



Over 18s Only



No Alcohol



CCTV

If you feel you are in difficulty with your gambling or know someone who is and would like help,

Call the National Gambling Helpline:

0808 8020 133

PLAYING THE MACHINES

Staying in Control



JOCUL LA APARATE:
CUM SĂ DEȚINEȚI CONTROLUL



LOJA ME MAKINERITË:
TË JESH NË KONTROLL



玩角子老虎机时：
保持克制



GRAJĄC NA AUTOMATACH:
NIE TRAC KONTROLI



ИГРАТЬ НА ИГРОВЫХ АВТОМАТАХ
ДЕРЖАТЬ СЕБЯ В РУКАХ



A JÁTÉKGÉPEKEN
VALÓ JÁTSZÁS:
MEGTARTANI A KONTROLLT



ИГРА НА РОТАТИВКИ: НЕ ГУБЕТЕ
КОНТРОЛ



मेशनिहरू खेलनु नियन्त्रणमा रहनुहोस्



MAKİNELERDE OYNARKEN:
KONTROLÜ ELİNİZDE TUTUN



JOUER AUX MACHINES À
SOUS : GARDER LE CONTÔLE



JUGAR CON LAS MÁQUINAS:
MANTENER EL CONTROL



NUTZUNG VON
SPIELAUTOMATEN:
DIE KONTROLLE BEHALTEN



HRANÍ NA AUTOMATECH:
MĚJTE TO POD KONTROLOU

364

18+ BeGambleAware.org



PLAY SENSIBLY

PLAY ENJOYABLY

PLAY AFFORDABLY



Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo

Version effective from 12 September 2022

1.1.1 - Qualified persons – qualifying position

Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators

1. In this condition the terms 'small-scale operator', 'qualifying position' and 'qualified person' have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006.
2. Schedule X¹ lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act for amendment of the details of the licence set out in Schedule X¹.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition 'qualified person' has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

¹ The schedules mentioned here will be attached to individual licences.

1.2.1 - Specified management offices – personal management licences

Applies to:

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences

1. Subject to 6 and 7 below, licensees must ensure:
 - a. that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - b. that at least one person occupies at least one of those offices
2. The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a. the overall management and direction of the licensee's business or affairs
 - b. the licensee's finance function as head of that function
 - c. the licensee's gambling regulatory compliance function as head of that function
 - d. the licensee's marketing function as head of that function
 - e. the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - f. oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
 - g. in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
3. The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
4. Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
5. Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
6. Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 ('the Regulations').
7. During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

2.1.1 - Access to (and provision of data from) key equipment

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1. Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

2.2.1 - Gambling software

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences

1 All gambling software¹ used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

¹ As defined in section 41(2)&(3) of the Act

2.3.1 - Technical standards

Applies to:

All non-remote gaming machine technical and gambling software licences and remote operating licences, including remote gaming machine technical, remote gambling software and betting ancillary remote licences, but not remote betting intermediary (trading rooms only) licences

1. Licensees must comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

2.3.2 - Bingo equipment specifications

Applies to:

Non-remote bingo operating licences and bingo ancillary remote licences

1. Licensees must comply with the Commission's specification for bingo equipment.

3.1.2 - Other networks

Applies to:

All remote casino, bingo, and betting licences (except ancillary remote and host licences)

1. Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
 - b. the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

3.1.3 - Hosting

Applies to:

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences

1. Subject to 2 below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
 - b. the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (eg the National Bingo Game).

4.1.1 - Segregation of funds

Applies to:

All remote operating licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
2. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling,
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer, and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

4.2.1 - Disclosure to customers

Applies to:

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5.1.1 - Cash and cash equivalents

Applies to:

All operating licences except gaming machine technical, gambling software and host licences

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (eg bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such policies and procedures are implemented effectively, kept under review, and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

6.1.2 - Use of credit cards

Applies to:

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences

1. Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

7.1.1 - Fair and transparent terms and practices

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008, at any stage of their interactions with consumers.

8.1.1 - Display of licensed status

Applies to:

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences

Read additional guidance on the technical requirements contained within this section.

1. Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
 - a. a statement that they are licensed and regulated by the Gambling Commission;
 - b. their account number; and
 - c. a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
2. Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
3. Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

9.1.2 - Prohibited bingo prize games

Applies to:

All non-remote bingo operating licences

1. Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

Applies to:

All operating licences except gaming machine technical and gambling software licences

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission from time to time.

14.1.1 - Access to premises

Applies to:

All operating licences

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

15.1.1 - Reporting suspicion of offences etc – non-betting licences

Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to 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 provision having the effect of a licence condition.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.1.3 - Reporting of systematic or organised money lending

Applies to:

All non-remote casino, non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website

15.2.1 - Reporting key events

Applies to:

All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company): • presenting of a petition for winding up • making of a winding up order • entering into administration or receivership • bankruptcy (applying to individuals only) • sequestration (applicable in Scotland), or • an individual voluntary arrangement.

Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.
7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number

issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
 - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional guidance on the information requirements contained within this section.

¹Key events are to be reported to us online via the 'eServices' digital service on our website.

15.2.2 - Other reportable events

Applies to:

All operating licences

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002, or Part III of the Terrorism Act 2000, or any UK law by which those statutes are amended or superseded.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional guidance on the information requirements contained within this section.

¹ Other reportable events are to be reported to us online via the 'eServices' digital service on our website.

15.3.1 - General and regulatory returns

Applies to:

All operating licences

1. On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.
2. In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.¹

Read additional guidance on the information requirements contained within this section.

¹ Regulatory returns are to be submitted to us online via the 'eServices' digital service on our website.

16.1.1 - Responsible placement of digital adverts

Applies to:

All licences

1 Licences must:

- a. Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b. take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c. ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

17.1.1 - Customer identity verification

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency ^{1} or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

1. Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
2. A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
3. Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
4. Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

¹ A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner.

Ordinary codes of practice 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 departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Social responsibility code

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.

1.1.1 - Cooperation with the Commission

Ordinary code

Applies to:

All licences

1. As made plain in its Statement of principles for licensing and regulation, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

1.1.2 - Responsibility for third parties – all licences

Social responsibility code

Applies to:

All licences

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
 - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences

1. Remote licensees must ensure in particular:
 - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
 - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators). *

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
2. Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
7. Licensees in fee category C or higher must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test

purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional guidance on the information requirements contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 21 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. Licensees in fee categories A or B should consider how they monitor the effectiveness of their policies and procedures for preventing underage gambling (for example by taking part in a collective test purchasing programme) and should be able to explain to the Commission or licensing authority what approach they have adopted.
7. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

3.2.11 - Remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
 - a. Verifying the age of a customer before the customer is able to:
 - i. deposit any funds into their account;
 - ii. access any free-to-play versions of gambling games that the licensee may make available; or
 - iii. gamble with the licensee using either their own money or any free bet or bonus.
 - b. warning potential customers that underage gambling is an offence;
 - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

3.2.12 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a. the information on how to gamble responsibly and access to help referred to above
 - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences

- 1 Licensees must offer a 'time out' facility for customers for the following durations:
 - a. 24 hours
 - b. one week
 - c. one month or
 - d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

3.5.1 - Self exclusion – Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.

8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.3 - Self-exclusion – remote SR code

Social responsibility code

Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. a record of the card numbers to be excluded;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.

8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

3.5.4 - Self-exclusion – Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
 - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
 - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed

to accept such material.

6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.5 - Remote multi-operator SR code

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting, remote general betting (remote platform), remote betting intermediary (trading room only), remote general betting (limited), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences

1. Licensees must participate in the national multi-operator self-exclusion scheme.

3.5.6 - Multi-operator non-remote SR code

Social responsibility code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their 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.

3.5.7 - Multi-operator non-remote ordinary code

Ordinary code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres

1. Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6.2 - Bingo

Ordinary code

Applies to:

All non-remote bingo licences

1. Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for playing bingo;
 - b. for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c. to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above
 - b. all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b. neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.6.7 - Remote

Ordinary code

Applies to:

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

3.8.2 - Money-lending – other than casinos

Ordinary code

Applies to:

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9.1 - Identification of individual customers - remote

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof.

4.1.1 - Fair terms

Social responsibility code

Applies to:

All licences, except gaming machine technical and gambling software licences

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2.2 - Display of rules - bingo

Social responsibility code

Applies to:

All non-remote bingo licences

1. In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a. rules about each variant of bingo made available; and
 - b. rules about any prize gaming made available.

4.2.3 - Display of rules – remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Licensees must make the following available to customers:
 - a. a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
 - b. such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's Remote gambling and software technical standards.

4.2.4 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences

1. Where practicable, the player's guide and additional information referred to in the social responsibility code 4.2.3 should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
 - a. send a copy of the guide and required additional information by post, fax or email; or
 - b. make these available to the customer in another medium to which he has access.

5.1.1 - Rewards and bonuses – SR code

Social responsibility code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a. the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
 - b. neither the receipt nor the value or amount of the benefit is:
 - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii. altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - c. if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases; and further that:
 - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

5.1.2 - Proportionate rewards

Ordinary code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

5.1.3 - Alcoholic drinks

Social responsibility code

Applies to:

All non-remote bingo and casino licences

1. If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
2. Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

5.1.6 - Compliance with advertising codes

Social responsibility code

Applies to:

All licences, except lottery licences

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (ie: those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

5.1.8 - Compliance with industry advertising codes

Ordinary code

Applies to:

All licences

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising.

5.1.9 - Other marketing requirements

Social responsibility code

Applies to:

All licences

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

5.1.10 - Online marketing in proximity to information on responsible gambling

Ordinary code

Applies to:

All licences

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

5.1.11 - Direct electronic marketing consent

Social responsibility code

Applies to:

All licences

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
- b. whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

Read additional guidance on the information requirements contained within this section.

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional guidance on the information requirements contained within this section.

¹ These matters are to be reported to us online via our 'eServices' digital service on our website.

² Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9.1.2 - Bingo

Social responsibility code

Applies to:

All non-remote bingo operating licences

1. Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
3. Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the statement of licensing policy under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Other provisions and legislation

- 4.7** Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's [*Licence Conditions and Codes of Practice*](#) (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.
- 4.8** Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

- 4.9** S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:
- a. in accordance with any relevant code of practice under s.24
 - b. in accordance with any relevant guidance issued by the Commission under s.25
 - c. reasonably consistent with the licensing objectives (subject to a and b above)
 - d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).
- 4.10** Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

- 4.11** The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.
- 4.12** It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.
- 4.13** The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- 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
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.

- 5.2 It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- 5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

Objective 2 : Ensuring that gambling is conducted in a fair and open way

- 5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

Objective 3 : Protecting children and other vulnerable persons from being harmed or exploited by gambling

- 5.13** In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

⁵ For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

- 5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- in accordance with any relevant code of practice under s.24 (ie the LCCP)
 - in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - reasonably consistent with the licensing objectives (subject to a and b above), and
 - in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20** Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21** In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

- 5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
 - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of Practice

5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.

5.26 To assist licensing authorities in determining premises applications and inspecting premises, [all the codes of practice](#) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the *Code of practice for equal chance gaming* and the *Code for gaming machines in clubs and premises with an alcohol licence*.

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation⁶ in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

⁷ Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

⁸ The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, among other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7

5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30** The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
 - Article 6 – right to a fair hearing
 - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
 - Article 10 – right to freedom of expression.

Other considerations

- 5.31** Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32** In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33** Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34** Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

⁹ *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at <http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy>

¹⁰ *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

- 7.50** A licence application, and any licence subsequently issued, is not valid if the relevant notifications have not been made.

Application for Premises Variation (s.187): ‘material change’

- 7.51** Previous guidance from the Department for Culture, Media and Sport (DCMS) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

- 7.52** In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as ‘responsible authorities’ and ‘interested parties’. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.
- 7.53** Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority’s statement of policy, or the Commission’s Guidance or Codes of Practice, are likely to be relevant.
- 7.54** The licensing authority will also need to consider if representations are ‘frivolous’ or ‘vexatious’. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:
- who is making the representation, and whether there is a history of making representations that are not relevant
 - whether it raises a ‘relevant’ issue
 - whether it raises issues specifically to do with the premises that are the subject of the application.
- 7.55** The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission’s approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

- 7.56** As explained earlier, the licensing authority’s primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:
- a. in accordance with any relevant code of practice issued by the Commission
 - b. in accordance with any relevant guidance issued by the Commission
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority’s statement of licensing policy (statement of policy) (subject to a. to c. above).

- 7.57** Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

- 9.32** The Act sets out certain matters that may not be the subject of conditions:
- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
 - s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
 - s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
 - s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include "the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

“In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c)).”

The subsection starts by imposing a general duty on the authority to ‘aim to permit the use of premises for gambling’ and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the *OED*⁹ as meaning: ‘5. To calculate one’s course with a view to arriving (at a point); to direct one’s course, to make it one’s object to attain. Hence fig To have it as an object, to endeavour earnestly’. The *Shorter OED*¹⁰ defines it as: ‘3. Direct one’s course, make it one’s object to attain, intend, try’. A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; ‘aim to permit’ provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority’s duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Section 1 Commentary

PART 8: PREMISES LICENCES

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

- (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

- (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
- (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
 - (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** 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 in order to do so.

PART 2

Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
2. The condition in paragraph 1 shall not apply to making gaming machines available for use.