

1. Overview

The holder of the Commercial Raffle Organiser's Licence is Surge Direct Pty Ltd. We will comply with all the rules and policies contained in this Code and will use our best endeavours to ensure that contractors or service providers also comply with these requirements. We are dedicated to minimising harm from gambling by fostering a safe and responsible gambling environment.

This Code of Conduct demonstrates our commitment to minimising harm related to gambling activities, ensuring fair and ethical practices, and adhering to standards set by the Victorian Gambling and Casino Control Commission (VGCCC). We are proactive in upholding responsible gambling principles that exceed minimum requirements and foster positive interactions with our customers and employees.

We strictly adhere to the Gambling Regulation Act 2003 and all VGCCC Ministerial Directions to ensure our operations meet all legal and regulatory standards. By prioritising compliance, we protect vulnerable individuals and maintain a safe, fair, and accountable gambling environment. Our commitment includes continuous review and adjustment of practices to keep pace with legislative updates.

2. Availability of the Responsible Gambling Code of Conduct

This code of conduct is available upon request from Ronan Hanley, Managing Director, Surge Direct Pty Ltd, on +61 416 925 526, or via email to info@surgedirect.com.au, and can be seen at lottery client's websites and at Surge Direct's website www.surgedirect.com.au.

Additionally, this code is made available for all of our staff in our employee handbook and is shared with all subcontracting teams and service providers via Surge Direct's Policy Manual.

3. Responsible Gambling Message

This message will be displayed on the Surge Direct Pty Ltd website (www.surgedirect.com.au) and on any material developed by Surge Direct Pty Ltd for the promotion and conduct of raffles on behalf of community and charitable organisations.

"At Surge Direct, we are dedicated to promoting responsible gambling practices in raffles and lotteries supporting community and charitable organisations. While we recognise raffles as a valuable fundraising tool, we prioritise the safety and well-being of our customers and staff.

We actively prevent gambling harm by providing educational materials, resources, and support services on our website www.surgedirect.com.au and by request. Our team is trained to reinforce responsible gambling practices, ensuring customers can make informed, transparent decisions when participating in lotteries.

Our goal is to create a responsible gambling environment that balances enjoyment with social responsibility, promoting a culture where safe gambling practices are embraced. Our

focus remains firmly on minimising gambling harm by supporting individuals to make informed decisions when participating in charitable campaigns.”

4. Responsible Gambling Information

Available on the Surge Direct website (www.surgedirect.com.au) and by request, are the following tips that support safe gambling practices when participating in charitable raffles and campaigns;

- a) **Understand Your Financial Commitment:** Review your financial situation to ensure you can comfortably afford the amount you commit to spending on raffle tickets. Responsible gambling includes staying within your means.
- b) **Set Personal Spending Caps:** Determine a spending limit for raffle ticket purchases ahead of time and stick to it. Only gamble with funds you're comfortable parting with.
- c) **Reflect on Motivations:** Periodically assess why you choose to gamble. Gambling for excitement, social reasons, or entertainment is very different from gambling with financial expectations. Being aware of your motivations can help keep gambling in perspective.
- d) **Monitor Time Spent:** Stay aware of how much time you're engaging in gambling activities. Establish a time limit for purchasing tickets and commit to it.
- e) **Maintain a Balanced Lifestyle:** Ensure that gambling doesn't become your primary activity. Engage in a variety of interests, hobbies, and social activities for a well-rounded life.
- f) **Identify and Address Triggers:** Recognise any emotional or environmental factors, like stress or social pressure that may increase gambling urges, and find healthy ways to cope.
- g) **Review Your Purchase Details:** Always read through your invoice, receipt, or ticket voucher to confirm purchase details and avoid misunderstandings.
- h) **Consult the Raffle Rules:** Familiarise yourself with the raffle rules, which are available at the point of sale, on the physical ticket, and on our charitable client's websites. Understanding the rules ensures you're fully informed and can participate responsibly.
- i) **Educate Yourself on Odds and Risks:** Learn about the odds of winning and the potential risks associated with gambling. Having a clear understanding of how gambling works can encourage informed and responsible choices.
- j) **Self-Exclusion Options:** We offer a self-exclusion program for those wishing to limit their access to raffle services. Information on how to initiate, modify, or end self-exclusion can be found on our website and is available upon request.
- k) **Resist the Urge to Recoup Losses:** If you experience a loss, avoid the temptation to keep buying tickets to "win back" money. Remember, gambling is a form of entertainment, not a way to generate income.
- l) **Restrictions That Apply to The Payment of Winnings:** Details of restrictions that apply to the payment of winnings are outlined in section 13.1 of our code of conduct available online at www.surgedirect.com.au, or via email to info@surgedirect.com.au, and telephone on (03) 9017 0288.

- m) **Access Support Resources:** If you sense that gambling might be becoming problematic, reach out promptly to any of our staff members for support via our website, via email to info@surgedirect.com.au, and telephone on (03) 9017 0288.

4.1 External Resources: additional information and support about responsible gambling may be available from the following resources:

a) **Lifeline Australia**

Phone: 13 11 14 (24/7 helpline)

Website: lifeline.org.au

Services: Provides immediate crisis support, including assistance for gambling-related distress, and helps with suicide prevention.

b) **Financial Counselling Australia**

Phone: 1800 007 007 (Free financial counselling service)

Website: financialcounsellingaustralia.org.au

Services: Offers free financial counselling, budgeting advice, and assistance with managing debt, especially for individuals affected by gambling.

c) **Gambler's Help**

Phone: 1800 858 858 (Free, 24/7 helpline)

Website: gamblershelp.com.au

Services: Provides confidential support for gambling issues, including self-exclusion programs, financial advice, and counselling services.

4.2 Our Responsible Gambling Officer: Ronan Hanley, Managing Director;
ronan@surgedirect.com.au, +61 416 925 526.

5. Gambling Product Information

The raffle terms and conditions are available on the website of each not-for-profit charity organisation for which we are selling entries subject to this code. The terms and conditions for the conduct of a raffle will be printed on the ticket and/or on the information material designed to promote this raffle.

The information made available to potential and new customers will include how to enter and the odds of winning the stated prizes based on the total possible ticket sales.

6. Customer Loyalty Scheme Information

We do not currently offer a customer loyalty scheme.

Should we introduce a loyalty scheme in the future, the Code of Conduct will be updated to ensure full transparency and compliance with VGCCC guidelines. In such case, the following points will be addressed:

If a customer loyalty scheme is implemented, participants will receive clear and accessible information regarding the scheme's terms, conditions, and benefits. Information will be on our website and provided upon request through our customer support channels.

Participating customers will be informed of any benefits they have accrued at regular intervals. Notifications will be sent via email or accessible through their customer account on our website.

7. Interaction with Customers

To identify and assist customers with gambling concerns we actively monitor customer interactions and purchasing behaviour through feedback consultations with our staff and via access to our raffle sales data, specifically observing any significant or repeated ticket purchases.

Additionally, all our staff are trained on the following processes when engaging with customers;

7.1 Encouraging Thoughtful Decision-Making at the Point of Sale: In both online and in-person promotions, our staff encourage potential buyers to take a moment to consider their decision to purchase tickets and the quantity they wish to buy. This brief "cooling-off" period helps promote thoughtful, intentional decision-making and discourages impulse purchases.

7.2 Direct Support and Self-Exclusion Options: If a customer displays any behaviours pertaining to problem gambling, we will discreetly reach out to provide assessment and support. Depending on the outcome of the assessment we will offer options such as setting personal spending limits or utilising our self-exclusion program, which allows customers to restrict or temporarily block their access to our services if they choose to take a break from gambling.

7.3 Respectful, Private, and Supportive Interactions: All customer interactions are handled with the utmost respect for privacy. Our staff are trained to be compassionate, non-judgmental, and supportive, ensuring that customers feel respected and understood. Where appropriate, we follow up with customers who have shown gambling concerns, providing them with ongoing support and resources.

7.4 Ongoing Monitoring and Comprehensive Staff Training: We are committed to continuously monitoring gambling patterns and updating our staff training regularly. Our team is equipped with the skills and knowledge necessary to identify potential gambling concerns and intervene effectively, ensuring a safe, responsible, and supportive environment for all customers.

8. Interaction with Staff

To ensure a fair and responsible environment staff members are not permitted to purchase tickets being sold by Surge Direct Pty Ltd.

8.1 Encouraging Proactive Support: We are committed to providing proactive support for staff members who experience challenges related to gambling in a prompt, sensitive

manner. Any staff member showing signs of distress potentially linked to problem gambling, regardless of whether it relates to lottery purchases, will be discretely encouraged to seek assistance from our Responsible Gambling Officer.

Our Responsible Gambling Officer: Ronan Hanley, Managing Director; ronan@surgedirect.com.au, +61 416 925 526 will assist any staff member referred or seeking information or support regarding gambling-related issues.

This support includes:

- a) **Offering a private and confidential conversation** to discuss any concerns the staff member might have, ensuring they feel supported and safe in talking openly about their situation. All discussions related to gambling concerns will be held in a private setting, away from the general work area, to ensure staff members' privacy and comfort. This approach fosters a safe, supportive environment for those seeking help.
- b) **Providing access to educational materials** that raise awareness and understanding of gambling-related issues, helping the staff member recognise any signs of problem gambling and the available support options (outlined in section 4.1 of this code).

9. Interaction with Problem Gambling Support Services

The Responsible Gambling Officer will establish a protocol to reach out to Gambler's Help services twice a year. This will include obtaining updated publications, changes to contact details, and information about available services.

Once this information is received, it will be communicated to all staff members and made available for customers as soon as practicable. This ensures that both staff and customers are informed about the available support services for problem gambling.

10. Customer Complaints

We are committed to addressing customer concerns in a fair, transparent, and timely manner. This process is designed to resolve complaints efficiently, protect customer rights, and ensure accountability. We follow the Victorian Gambling and Casino Control Commission's (VGCCC) guidelines to provide a robust complaint management process.

10.1 Lodging A Complaint: If a customer wishes to lodge a complaint related to our Gambling Code of Conduct, they may do so:

- a) in writing addressed to: Complaints Officer, Surge Direct Pty Ltd, 3-5 Sanders Place Richmond Victoria, 3121
- b) via email at: info@surgedirect.com.au
- c) via telephone at 03 9017 0288

The following details are required when lodging a complaint:

- a) Customer name and contact information

- b) Date and time of the issue
- c) Description of the issue and supporting evidence (if any)
- d) Preferred solution (if applicable)

10.2 Investigation: The Complaints Officer will investigate the complaint as soon as possible and take the following steps to resolve the issue reported:

- a) Receipt of the complaint will be acknowledged (and where possible resolved) within 24hours.
- b) The complaint will be assessed to see if it is relevant to the Gambling Code of Conduct and advise through written notification.
- c) Gather all necessary information from relevant parties if further investigation is required.
- d) Provide regular updates on the resolution process while the investigation is ongoing.
- e) If the customer is not satisfied with the investigation or outcome, the matter will be escalated to the Operations Manager/Managing Director for further review.
- f) If Surge Direct is unable to resolve the complaint to the customer's satisfaction, the issue will be referred to an independent mediator with no business association to conduct an unbiased review of the complaint.

10.3 Processing and Review: All complaints received will be entered into a complaints system, and complaints will be provided to the Victorian Gambling and Casino Commission Control (VGCCC) upon request. We regularly review and update our complaints process to ensure it meets VGCCC standards and best practices in the industry.

10.4 Resolution: All complaints aim to be resolved internally within 21 days of receipt. In some instances, it may be necessary to engage the IAMA (Institute of Arbitrators and Mediators Australia) to assist in mediation.

11. Commitment to Discourage Gambling by Minors

11.1 Promotion to Minors: We do not promote gambling to children and will not direct any promotions or sales campaigns toward minors. We also will not knowingly sell raffle tickets to individuals under 18 years of age.

11.2 Responsible Prize Distribution: In accordance with the law, we will not award any raffle prizes containing alcohol or other items that minors are legally prohibited from purchasing to anyone under the age of 18.

11.3 Responsible Age Verification: To protect minors, we enforce strict age verification procedures and educational initiatives. Our staff are trained to:

- a) Check and verify identification to prevent minors from participating in gambling activities,
- b) Recognise and report any potential breaches of age restrictions,
- c) Clearly display signage indicating that gambling is restricted to individuals over 18 years old.

This approach upholds our responsibility to prevent underage gambling and protect minors from potential harm.

12. The Gambling Environment

12.1 Discouraging Problem Behaviours: We are committed to discouraging excessive gambling behaviours, particularly regarding the purchase of tickets. To achieve this, we will implement the following measures:

- a) **Limit on Ticket Purchases:** A maximum quantum or value of tickets will be set for each individual to prevent excessive purchasing.
- b) **Monitoring Purchases:** The database of regular ticket purchasers will be regularly checked to identify patterns of excessive purchases.
- c) **Sales Techniques:** Staff will refrain from using hard or pressure sales techniques to encourage ticket purchases.

12.2 Monitoring and Intervention: once an individual reaches the established quantum or value limit or is identified as exhibiting a pattern of excessive purchasing, we will take the following actions:

- a) Customers will be informed about their purchasing limits and encouraged to consider their gambling habits.
- b) Appropriate mediations will be implemented to address excessive purchasing behaviours, which may include offering information about support services for gambling issues.

12.3 Awareness of the Passage of Time: We do not offer online point of sale for any of our raffles, all transactions are face-to-face or via telephone with a staff member that is trained to monitor time spent with each customer.

If we move sales online, we will promote responsible gambling by implementing an automated popup window on our website that appears after customers have been active for a prolonged period. This will help remind customers of the time spent engaging in gambling activities.

13. Financial Transactions

13.1 Notifications to Customers:

- a) **No Credit Extensions:** Customers will be clearly informed of our policy regarding no credit extensions at the point of sale, both on our website and during any in-person or telephone transactions. This policy is also outlined in our terms and conditions.
- b) **We Will Not Cash Cheques:** Customers will be clearly informed that we will not cash customers cheques, both on our website and during any in-person or telephone transactions. This policy is also outlined in our terms and conditions.
- c) **No Cash Prizes:** Customers will be clearly informed that Prizes of cash are not permitted in Victoria by law except that cash may form up to 10 percent of a travel prize, both on our website and during any in-person or telephone transactions. This policy is also outlined in our terms and conditions.

13.2 Payment of Winnings: In accordance with Victoria's legal requirements, we do not offer cash prizes, except where cash may constitute up to 10 percent of a travel prize. For all

other prizes, we provide clear details on the prize type, how it will be delivered or collected, and any steps winners must take to claim their prize. This information is available on the raffle tickets, our website or charity client's website, and in promotional materials.

14. Responsible Advertising and Promotions

We are dedicated to upholding the highest advertising ethics as set by the Australian Association of National Advertisers. Our advertising and promotional materials are always truthful and not misleading, ensuring clear communication about odds, prizes, and chances of winning.

14.1 Compliance and Quality Control Measures

- a) **Pre-Publication Review:** Before any advertising or promotional material is published, it undergoes a thorough pre-publication review. This process ensures that all content is accurate, ethically sound, and complies with legal and responsible gambling standards.
- b) **Advertising Checklist:** We use a detailed checklist to verify the integrity of all advertising content. This checklist includes verifying truthfulness, ensuring a positive consumer experience, and preventing the exploitation of vulnerable groups.
- c) **Management Approval:** Every advertisement or promotional material must be approved by Management. This provides an additional level of scrutiny and accountability for all marketing efforts.

14.2 Regular Staff Training: Our marketing and advertising teams undergo regular training to stay informed about the latest regulations and ethical standards, ensuring our content is always compliant.

14.3 Review of Client Raffle Pages: Before activating any client raffle pages, we conduct a detailed review to confirm that they meet our responsible advertising principles. This includes checking for accuracy, ethical messaging, and compliance with our standards.

14.4 Promotion Content Guidelines: We ensure that our promotions do not suggest that gambling is a viable financial strategy or associate gambling with alcohol consumption. Additionally, we obtain consent from all identified winners before featuring them in promotional content, ensuring all advertisements are respectful and appropriate.

14.5 Continuous Monitoring and Evaluation: We regularly assess the effectiveness of our advertising campaigns through audits and evaluations to ensure they align with our commitment to responsible advertising practices.

14.6 Transparency and Accessibility: Our advertising policies and standards are publicly accessible on our website, promoting transparency and allowing for public accountability.

15. Ongoing Implementation of the Code.

15.1 Regular Reviews: Responsible Gambling will be a regular agenda item at staff meetings.

15.2 Implementation Procedure: A Responsible Gambling Officer, selected from senior staff, will be designated to:

- a) Manage challenging customer interactions,
- b) Coordinate with Gambler's Help services to gather relevant information, advice, and training, and ensure this is shared with both staff and customers,
- c) Provide induction training for new staff members, ensuring they are informed about responsible gambling and the Code of Conduct,
- d) Address any responsible gambling concerns raised by staff,
- e) Identify and recognize staff members who demonstrate outstanding efforts in promoting responsible gambling.

16. Code Review Process

The operation and effectiveness of this code will be reviewed annually in June, with input gathered from management, staff, and a sample of patrons regarding its impact and implementation.

A report of the review will be provided to the VGCCC by 30 June each year.