



Responsible Gambling Code of Conduct

(On-course only bookmakers)

1 January 2026

This Responsible Gambling Code of Conduct is made pursuant to the *Gambling Regulation Act 2003* (Vic).

This Code applies to all Bookmakers who are members of the Victorian Bookmakers' Association Limited operating on-course only who have decided to adopt and adhere to the Code. The Code records the relevant Bookmaker's commitment to operating their business in a manner which reduces harm associated with problem gambling, by creating a responsible gambling culture and environment in line with applicable legislation and, as applicable, the Ministerial Direction – Responsible Gambling Codes of Conduct dated 17 September 2018 (as varied by the Ministerial Direction No. S 85 dated 21 February 2020), relevant sections of the Ministerial Direction No.S 349 dated 6 July 2022 which relate to matters covered by the Code, best practice and community expectations.

Any obligations which apply to Bookmakers under separate Commonwealth, State and Territory laws are in addition to, and operate independently of, this Code. This includes the National Self-Exclusion Register (BetStop), which commenced on 21 August 2023 and also the South Australian Barring and Online Employee Notification ('BOEN') system. These obligations do not form part of this Code.

Victorian Bookmakers' Association Limited

(ABN 45 004 236 677)

Version 1.05

Last Updated: 1 January 2026

Table of Contents

Contents

Table of Contents	2
Glossary	3
1. Introduction.....	6
2. Aim, objective and content of the Code	6
3. Responsible Gambling commitment.....	7
4. Protecting the consumer to promote Responsible Gambling and to minimise harm	8
5. Provision of consumer protection information	8
6. Interaction with customers and Problem Gambling support services	9
7. Interaction with employees	10
8. Gambling environment	11
9. Minors.....	11
10. Financial transactions	12
11. Responsible advertising and promotions	12
12. Customer loyalty program	12
13. Training and skill development	13
14. Customer complaints	13
15. Privacy policy.....	15
16. Compliance with all applicable laws and conflicts	15

Glossary

Accessible means, in relation to any document or other information:

- (a) a hardcopy document being physically within the possession of the VBA Member; or
 - (b) an electronic document being accessible to the VBA Member on a mobile device (such as a laptop computer, iPad or telephone), including through a link to the VBA's website,
- which may be reviewed by the VBA Member and also shown to a customer;

Act means the *Gambling Regulation Act 2003* (Vic);

AML/CTF Legislation means the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), the *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No.1)* and any other applicable legislation, regulations or instruments;

AML/CTF Program means a written program complying with the AML/CTF Legislation and adopted by a VBA Member, which details the measures and procedures which that VBA Member maintains to identify, mitigate and manage money laundering / terrorism financing risks that their business may reasonably face when providing designated services to their customers;

Bookmaker means a person who carries on the business or vocation of or acts as a bookmaker or turf commission agent and who holds a Club Bookmaker's Licence. The term **Bookmakers** has a corresponding meaning;

Club Bookmaker's Licence means, in respect of a Bookmaker, an unexpired licence or permit (including a substitute licence or substitute permit) whereby that Bookmaker is licensed or permitted by the relevant Controlling Body or by any racing club or by any person having the management or control of a Racecourse or by any promoter of any sports on any sports ground to carry on the business or vocation of bookmaking on a Racecourse, any part of a Racecourse, an approved off-course premises or (as the case may be) on a sports ground, as specified in the relevant licence or permit;

Club Betting Permit means a club betting permit issued under section 5B of the Racing Act;

Code means this Responsible Gambling Code of Conduct (as amended), as adopted by VBA Members as at the Commencement Date;

Commencement Date means 1 January 2026;

Controlling Body means:

- (a) in the case of horse racing, Racing Victoria;
- (b) in the case of harness racing, Harness Racing Victoria; and
- (c) in the case of greyhound racing, Greyhound Racing Victoria;

Customer Complaint means a complaint from a customer about the provision of gambling and includes a complaint relating to this Code, but does not include a general request by that

customer for information from the VBA Member;

Ministerial Directions means the Ministerial Direction dated 10 September 2018 by the Minister for Consumer Affairs, Gaming and Liquor Regulation pursuant to section 10.6.6 of the Act, as published in the Victorian Government Gazette on 17 September 2018 (as varied by the Ministerial Direction No. S 85 on 21 February 2020) and the Ministerial Direction dated 4 July 2022 by the Minister for Consumer Affairs, Gaming and Liquor Regulation pursuant to section 4.8A.2 of the Act, as published in the Victorian Government Gazette on 6 July 2022;

Minor means any person who is under the age of 18 years;

Mixed Sports Gathering Permit means a mixed sports gathering permit issued under section 19 of the Racing Act;

Permit means any of the following (as applicable);

- (a) a Club Betting Permit;
- (b) a Mixed Sports Gathering Permit; or
- (c) a Restricted Harness Racing Permit;

Problem Gambling occurs when a customer has difficulties in managing their gambling activities, particularly the scope and frequency of gambling and the amount of time spent gambling, with negative impacts potentially including the following, as determined by the Bookmaker based on available information:

- (a) extreme financial losses relative to their sources of income;
- (b) adverse personal effect on the customer, his or her family and friends; and/or
- (c) adverse effect on employers and work performance;

Problem Gambling Support Services refers to trained professionals, including psychologists, counsellors and social workers, who provide confidential counselling to individuals and/or their families in relation to a gambling related harm;

Racecourse means a racecourse licensed under section 24 of the Racing Act or any other relevant laws or regulations;

Race Club means a club registered in accordance with the rules of Racing Victoria, Harness Racing Victoria or Greyhound Racing Victoria;

Racing Act means the *Racing Act 1958* (Vic);

Responsible Gambling occurs in a regulated environment where the potential for harm associated with gambling is minimised and people make informed decisions about their participation in gambling. Responsible gambling occurs as a result of the collective actions and shared ownership of individuals, communities, the gambling industry and the government to achieve outcomes that are socially responsible and responsive to the concerns of the broader community;

Responsible Gambling Message means the relevant responsible gambling message set out in the Ministerial Direction No. S 137 dated 24 March 2023;

Restricted Harness Racing Permit means a restricted harness racing meeting permit issued under section 19A of the Racing Act;

Rules means the following rules and other documents, as may be amended and replaced from time to time:

(a) Racing Victoria:

- Rules of Racing 2020, as constituted by the Australian Rules of Racing made by the Australian Racing Board and the Local Rules and Rules of Race Betting of Racing Victoria;
- Club Bookmakers' Licence Rules;
- Bookmaker Sports Betting Rules;
- Bookmakers' Telephone Betting Rules;
- Bookmakers' Internet Betting Rules;
- List of Approved Bet Types; and
- Victorian Bookmakers' Policies,

(available at <https://www.racingvictoria.com.au/wagering/>)

(b) Harness Racing Victoria:

- Bookmakers and Betting Rules, contained within the Local Rules (Victoria) of the Australian Harness Racing Rules, (available at <https://www.harness.org.au/rules/>);

(c) Greyhound Racing Victoria:

- Betting and Bookmaker Rules, (available at: <http://www.grv.org.au/rules-of-racing/>);

(d) Permit:

Conditions attaching to a Permit, as administered by the Department of Justice and Community Safety, Office of Liquor, Gaming and Racing, (available at <https://www.justice.vic.au> or by telephone on (03) 8684 1910);

VBA means the Victorian Bookmakers' Association Limited (ABN 45 004 236 677);

VBA Member means a current member of the VBA who holds a Club Bookmaker's Licence and who is required to implement and adhere to this Code;

Venue means the place or place from or at which the VBA Member lawfully conducts its bookmaking business in Victoria, not including a Home Office. The term **Venues** has a corresponding meaning;

VGCCC means the Victorian Gambling and Casino Control Commission;

Wagering means any activity which involves placing a bet on the outcome of a racing, sporting or other approved event at a Venue; and

Winnings means the money won by a customer on a Wagering product or service.

1. Introduction

The VBA was established on 12 July 1940 and is a not-for-profit members association operated for the benefit of VBA Members (who are licensed on-course Bookmakers).

VBA Members operate their bookmaking businesses:

- On-course at metropolitan and country race meetings and major sporting and other events; and
- in respect of some VBA Members, also over the telephone and through digital channels (internet).

It is a requirement of all VBA Members when applying for registration with the VGCCC as a Bookmaker to submit a Responsible Gambling Code of Conduct with their application, which the Bookmaker intends to implement if registered.

This Code has been prepared by the VBA and adopted by VBA Members having regard to the highest levels of integrity and in accordance with all applicable legislation. It applies to all VBA Members who choose to adopt and adhere to this Code.

2. Aim, objective and content of the Code

Aim of the Code

The aim of this Code is to set out the minimum standards each VBA Member must adopt. It is designed to:

- set standards and requirements which apply across a VBA Member's business, to assist in the responsible delivery of their Wagering products;
- ensure compliance with all Australian State and Territory legislation, including the Act, as well as all applicable regulatory obligations in relation to gambling harm minimisation;
- ensure alignment and compliance with the Ministerial Directions; and
- reflect the values and commitment of each VBA Member to minimising the potential harm which is associated with gambling.

Objective of the Code

The objective of this Code is to ensure that an appropriate framework is in place that means, in respect of each VBA Member, that:

- their customers are empowered to make informed decisions about gambling;
- where any customer requires assistance, access to gambling help services is facilitated; and
- relationships are maintained with key stakeholders in the industry to continue to enhance the understanding of VBA Members of Problem Gambling, through liaison with government, Problem Gambling Support Services, industry groups and other stakeholders.

Content of the Code

Taking into account the above aims and objectives, this Code comprises:

- the VBA Member's commitment in relation to Responsible Gambling;
- the information each VBA Member will make available to their customers to ensure they have information concerning the VBA Member's Wagering products, Responsible Gambling and Problem Gambling Support Services;
- what each VBA Member does to implement the responsible delivery of their Wagering products;
- what each VBA Member does to deliver on their commitment, as set out in section 3 of this Code, including how each VBA Member provides support and assistance to their customers who may be seeking assistance in respect of Problem Gambling; and
- how this Code is administered for the benefit of the relevant VBA Member's customers.

This Code will be reviewed regularly by the VBA (for the benefit of the VBA Members and their customers) and will incorporate any new processes and practices based on best practice, evolving research, technology, business practices and regulatory amendments.

3. Responsible Gambling commitment

For many people, gambling is an enjoyable entertainment activity that does not cause any issues or problems. Unfortunately, some people can experience a loss of control from their gambling that results in problems for themselves, their families, their employer and the community in general.

This Code aims to help protect individuals and the community and minimise the harms associated with Problem Gambling. Each VBA Member is committed to:

- operating their business in a manner which reduces harm associated with Problem Gambling, by creating a responsible gambling culture and environment in line with:
 - applicable legislation;
 - the Ministerial Directions;
 - the Rules;
 - best practice; and
 - prevailing community standards; and
- complying with this Code.

4. Protecting the consumer to promote Responsible Gambling and to minimise harm

VBA Members must have appropriate measures in place consistent with this Code to ensure customers can enjoy gambling and that systems are in place to help ensure that vulnerable individuals do not experience a loss of control from their gambling. This includes having policies, procedures and a culture of compliance in their business that promotes Responsible Gambling.

For individuals, Responsible Gambling means gambling for pleasure and entertainment, being aware of their likelihood of losing, understanding the associated risks, exercising control over their gambling activity, gambling in a manner that is in balance with other activities in their lives and not causing problems or harm for themselves or others.

Responsible Gambling for the broader community, including VBA Members, other gambling service providers, governments, and sporting associations, requires a shared responsibility for generating awareness of the risks associated with gambling, creating and promoting environments that prevent or minimise Problem Gambling and being responsive to community concerns around gambling.

5. Provision of consumer protection information

The conduct of the VBA Member's business is subject to the provisions of the Act, the Racing Act, the Ministerial Directions and the Rules.

Each VBA member will provide accurate and meaningful information to their customers so that they are able to make informed decisions about their gambling (including whether to gamble or not) and minimising gambling harm.

The following information will be readily available to all customers of a VBA Member in the following ways:

- a copy of the Code is Accessible to the VBA Member when fielding, and either shown or made available electronically to their customers upon request;
- the Responsible Gambling Message is displayed;
- the odds for all Wagering products offered are displayed;
- a copy of the current Rules (which governs betting between a VBA Member and its customers) is Accessible to customers upon request; and
- gambling-related complaint resolution mechanisms and appropriate documentation are Accessible and either shown or made available electronically to a customer upon request.

(a) Written communications to customers

Where the VBA Member sends out written communications, the VBA Member will ensure that all written communications with those customers will incorporate the Responsible Gambling Message.

A copy of the Code and the Rules will be available on the VBA website:

www.vicbookmakers.com.au.

6. Interaction with customers and Problem Gambling support services

VBA Members must have appropriate interaction and engagement with customers and gambling support services to foster Responsible Gambling.

(a) Customers

Each VBA Member will ensure that:

- the Responsible Gambling Message is communicated physically or electronically (as applicable), as provided for in this Code;
- all responsible gambling materials are Accessible when conducting business at a Venue, and that these materials are available to the VBA Member's customers as provided for in this Code;
- the VBA Member and any employees undertake periodic Responsible Gambling training (provided through the VBA or appropriate third party service providers) that complies with section 13, and have available at all times the contact details of Gambler's Help and similar services which they can provide to their customers;
- in forming an opinion under this clause, the VBA Member will have regard to information available to the VBA Member (in its entirety) based on the interaction with the relevant customer;
- where a customer is displaying indicators of distress that may be related to Problem Gambling, the VBA Member must take appropriate action as is necessitated by the circumstances, which may include:
 - providing a customer information (in a format appropriate for that customer e.g., email, verbally or SMS) about available gambling support services such as:
 - Gambler's Help or Gambling Help on 1800 858 858 or at www.gamblershelp.com.au or www.gamblinghelponline.org.au; or
 - Gambler's Help Youthline on 1800 262 376;
 - asking them some questions to bring to their attention to the VBA Member's concern that they may be experiencing gambling harm;
 - follow up, if contact details are maintained, with an email or SMS with information about the VBA Members responsible gambling tools or providing information about available gambling support services; or
 - as it considers appropriate, any other relevant response;
- direct marketing is only sent to customers who have provided their express consent to receive direct marketing:
 - the process to unsubscribe from direct marketing must be easy to access and use on any platform the customer uses;
 - the VBA Member may not offer any inducement (such as a credit, voucher, reward or other benefit) to the customer to encourage them to consent or continue to consent to receive direct marketing; and
 - the VBA Member must not send direct marketing to a customer at any time after five business days from the day it has received notification from that

- person that they have wish to withdraw their consent; and
- all interactions with customers occur in such a way that respect their right to privacy and comply with all applicable laws.

(b) Problem Gambling support services

Each VBA Member will review the Gambler's Help and Gambling Help websites (www.gamblershelp.com.au and www.gamblinghelponline.org.au.) annually (or more frequently as required) to obtain updated copies of updated publications and relevant information they have available.

Once this information is obtained, the VBA Member will ensure it is communicated to their employees (as applicable), as well as ensuring this it is Accessible (as required) to their customers, as soon as reasonably practicable after it is received.

Each VBA Member will maintain a record (either physically or electronically) of these website visits. The VGCCC may, at any time, inspect these records.

7. Interaction with employees

The employees of the relevant VBA Member may be permitted to participate in gambling with their employer. Where employees of the VBA Member are permitted to participate in gambling with that VBA Member, then if an employee indicates that they are possibly experiencing Problem Gambling, then the VBA Member will direct that person to the following services and make available Responsible Gambling materials. All the interactions with that person will respect the staff member's right to privacy:

- Gambler's Help or Gambling Help on 1800 858 858 or at www.gamblershelp.com.au or www.gamblinghelponline.org.au; or
- Gambler's Help Youthline on 1800 262 376.

Regardless of whether employees are permitted to participate in gambling with their employer, that VBA Member will:

- encourage their employees to be aware of Responsible Gambling issues. This Code will form part of the induction information given to all new employees when they commence their employment. In addition, all of the relevant VBA Member's employees will be provided with appropriate training about the purpose, content and procedures of this Code;
- record (either physically or electronically) details of any Responsible Gambling training undertaken by their employees, including the date and nature of the training that has been provided. The VGCCC may at any time inspect this register; and
- recognise and know which of its employees are responsible for assisting the VBA Member effectively implement and adopt the practices of this Code. Any matters raised by those employees about the operation of this Code should be directed to, and seriously considered by that VBA Member.

8. Gambling environment

Each VBA Member will, in relation to a Venue, ensure (to the extent possible) that:

- (a) a safe environment is maintained to protect the interests of their customers and a physical environment is maintained that is consistent with Responsible Gambling; and
- (b) where accepting bets, any customer who appears to be intoxicated is not permitted to place a bet with the VBA Member. A customer will be considered intoxicated if their speech, balance, co-ordination or behaviour is noticeably affected and there are reasonable grounds for believing that this is the result of the consumption of alcohol; and
- (c) where accepting bets, any customer who has been engaging in extended and intensive wagering, is appropriately monitored by the VBA Member and any action which is considered by the VBA Member has regard to the context within which such betting is occurring.

To discourage the customers from engaging in extended and intensive gambling, each VBA Member acknowledges that customers can check the passing of time in Venue in several ways, including as follows:

- (a) race and sports betting are time dependent, and each event displays the time it starts;
- (b) a customer can ask the VBA Member;
- (c) a customer's awareness of the passing of time is made by the programming of the particular event, like the race times;
- (d) on-course operations are restricted by the first and last race time, this is reflected in the available gambling window on-course; and
- (e) all bet tickets have the time of purchase or issue on them.

Actions that can be taken by a VBA Member to discourage customers from engaging in extended and intensive wagering include, for example, engaging with customers to:

- (a) provide information in relation to the responsible gambling tools available which include potentially recommending that the customer take a break;
- (b) provide responsible gambling information and support services; or
- (c) where relevant, freezing or closing the customer's account.

9. Minors

Each VBA Member will adopt strategies to ensure that:

- (a) Minors are prohibited from gambling and are not induced to gamble;
- (b) customers must, upon request, provide a date of birth and assert that they are over 18 years of age;
- (c) an appropriate warning on the VBA Member's website exists (where applicable), in a prominent position, advising that minors are not permitted to bet with the VBA Member; and
- (d) they do not employ Minors.

10. Financial transactions

Each VBA Member will ensure that:

- (a) all Wagering transactions are to be paid by a customer to the VBA Member in cash or, at the option of the VBA Member, by electronic transaction (bank transfer);
- (b) customer cheques are only accepted by the VBA Member if pre-arranged and records of any cheques accepted by pre-arrangement are maintained in accordance with the VBA Members financial obligations;
- (c) when conducting business at a Venue (on-course), if any customer with winnings in excess of \$1,000 requests payment by cheque, the VBA Member may pay the winnings by cheque or alternatively electronic transaction (bank transfer) at their option.

11. Responsible advertising and promotions

Prior to undertaking any advertisement or promotion related to Wagering, the VBA Member will ensure careful review is undertaken against the obligations below to ensure any such advertising or promotion will:

- (a) comply with all applicable Commonwealth, State and Territory laws, regulations and Codes relating to the advertising or promotion of Wagering products, including the Australian Association of National Advertisers Code of Ethics. Any television advertising and promotion must also comply with the Federation of Commercial Television Stations (FACTS) Code of Practice;
- (b) not be false, misleading or deceptive about odds, prizes or the chances of winning;
- (c) not be offensive or indecent in nature;
- (d) not create an impression that gambling is a reasonable strategy for financial betterment but rather should centre on entertainment purposes;
- (e) not promote the consumption of alcohol while purchasing the Wagering products at the Venue;
- (f) not advertise any material that includes Minors, is directed at Minors, portrays Minors participating in gambling, or be set up in an area specifically to target Minors;
- (g) not verbally urge non-gambling customers to buy gambling products; and
- (h) contain the relevant Responsible Gambling Message.

12. Customer loyalty program

- (a) Each VBA Member will determine whether or not it wishes to offer a loyalty scheme as defined in the Act to their customers. The offering of bonus bets and other similar promotions by a VBA Member to their customers does not constitute a loyalty scheme.
- (b) If a loyalty scheme were to be offered by the VBA Member, then all participating customers will be provided with full particulars of the scheme in writing or via the VBA Member's website (if applicable). Details about the VBA Member's conduct in relation to such loyalty program is available to a customer on request.

13. Training and skill development

Each VBA Member will ensure that all staff receive appropriate information and training on Responsible Gambling, as set out below:

- (a) all relevant staff (being a director, employee or contractor) engaged in the provision of gambling services must complete appropriate Responsible Gambling training within one month of commencing employment. This training should meet the minimum requirements of the National Unit of Competency;
- (b) training can be either conducted by an external provider (**External Training**) or developed and delivered internally (**In-House Training**), in accordance with applicable requirements;
- (c) all relevant staff undertake annual refresher training regarding Responsible Gambling (either provided by the VBA or through External Training);
- (d) a register be maintained of all training conducted (either physical or electronic) and kept as a part of Responsible Gambling records for a minimum of seven years. This register will include staff name, date of training and type of training;
- (e) other records related to training (including any independent review of any In-House training) must also be kept for seven years; and
- (f) policies and procedures be reviewed to ensure staff are up-to-date with current requirements.

14. Customer complaints

Subject to the Memorandum of Understanding between the VBA, the VGCCC and Racing Victoria Limited dated 14 February 2023, the below complaints process is limited to compliance with the requirements of this Code.

- (a) a customer with a complaint about the operation of this Code can make this complaint to the relevant VBA Member either verbally or in writing;
- (b) the VBA Member will enter details of any complaint received in a complaints register (kept either physically or electronically), or in some other electronic record, which contains (as applicable) the date of the complaint and complainant information, details of the complaint, details of the relevant person receiving the complaint, date of response / resolution (as applicable), details of outcome and bookmaker sign-off (where kept physically). The VGCCC may at any time inspect this register or electronic record (as applicable) and otherwise monitor the VBA Member's dealings with customer complaints;
- (c) the VBA Member will respond to any complaint received, in writing, within 28 days of receipt of the complaint;
- (d) if the complaint is substantiated by the VBA Member, the VBA Member will inform the customer of the action that they have undertaken to remedy the complaint;
- (e) if the VBA Member determines that the complaint does not relate to the operation of this Code, the customer will be informed as to their reasons for this determination;

- (f) if the customer does not agree with the VBA Member's decision, and the customer requests further options to have the complaint reviewed, then the VBA Member will make available to the customer the options below to further pursue the complaint. These options include:
- (i) **independent review:** the customer making a written request for an independent internal review of the VBA Member's decision by a person who was not involved in the decision making for the original decision, this process will involve:
 - the customer providing a written explanation as to why they disagree with the original decision and additional relevant information to the VBA Member; and
 - the VBA Member allocating a new decision maker to determine the complaint and provide a written response to the customer in accordance with this clause 14; and
 - (ii) **referral:** the VBA Member may refer the complaint to the most appropriate body for review or consideration, which may be:
 - the VBA;
 - the VGCCC; or
 - the relevant Controlling Body (should the nature of the complaint also be relevant to the Rules under which the VBA Member conducts its bookmaking operations); and
 - (iii) other avenues: notifying the customer of potential external bodies for review or consideration, which may include:
 - the Resolution Institute; or
 - the Victorian Court and tribunal system, and

if supporting the customer in determining which is the most appropriate body, the VBA Member will refer the customer to this Code while having regard to the material jointly published by the VBA, VGCCC and Racing Victoria Limited, the content of the complaint and the binding nature of the decision as highlighted below.

Where the avenue chosen by the customer for independent review is able to make binding decisions on the VBA Member, the VBA Member will be bound by that decision (subject to any appeal rights). A binding decision is made by the VGCCC, a Controlling Body, a Victorian Court and tribunal system or, by the Resolution Institute, where the parties agree for it to be binding.

Where a complaint is reported to VBA, its role and powers in respect of any such complaint will be limited to assisting the parties (if possible) to seek a mutually agreed outcome in respect of the complaint. VBA, in its capacity as a member association, does not have the power or authority to sanction the relevant VBA Member or otherwise make any binding determination in respect of the complaint.

- (b) If the complaint cannot be ultimately resolved through these channels the customer can pursue their own possible cause of action.

15. Privacy policy

Each VBA Member will respect and protect the privacy of their customers. They will maintain the privacy of customer information and ensure, as far as possible, that there is no unauthorised or inappropriate disclosure of personal information obtained or kept under this Code.

Where a VBA Member is bound by the *Privacy Act 1988* (Cth), that VBA Member will act in accordance with that Act and ensure compliance with the Australian Privacy Principles.

16. Compliance with all applicable laws and conflicts

Each VBA Member who operates on-course only will comply with all relevant Australian State and Territory laws, regulations and other instruments relating to the provision of their Wagering products to customers, including those relating to:

- Minors;
- the provision of credit to a customer;
- the Rules;
- advertising and promotions;
- privacy; and
- Responsible Gambling Codes of Conduct and/or Practice.

Where there is any conflict which arises between any Commonwealth, State and Territory laws or regulations and this Code, the higher standard (as reasonably determined by each VBA Member in consultation with the VBA) will apply.