

Responsible

Gambling

Code of Conduct.

Victoria

Australian Leisure and Hospitality Group
(‘ALH Group’ or ‘ALH’)

October 2025

1. Introduction

1.1 The Australian Leisure and Hospitality Group (**ALH**) is committed to being an industry leader in the provision of the responsible service of gaming in ALH venues (**venues**) across Australia. Our Code of Conduct (**Code**) is available at our venues and on our website: <https://www.alhgroup.com.au/responsible-service-of-gaming>

1.2 The Code has been written in a manner that enables it to be readily understood by customers. As a minimum requirement, the Code must be written in plain English and be presented in such a way as to be reasonably accessible to guests, including guests from culturally and linguistically diverse backgrounds.

1.3 The Code is available in the following languages on the ALH website:

- Greek
- Italian
- Vietnamese
- Chinese
- Arabic
- Turkish
- Spanish

1.4 This Code has been drafted and reviewed by ALH and is inclusive of the content set out in the Ministerial Direction given pursuant to s10.6.6(1) of the Gambling Regulations Act 2003 (Vic) (**Act**) and effective from 1 March 2020.

1.5 This Code has been submitted to the Victorian Gambling and Casino Control Commission (**VGCCC**) for publication on their website.

1.6 The Code may be amended by the ALH. Where the Code is amended, ALH must provide a copy of the amended Code to the VGCCC.

1.7 Any guest questions about the operation of the Code can be addressed to team members or management at the venue, or by email to the ALH Safer Gaming team at safergaming@alhgroup.com.au.

2. ALH Responsible Gambling Message

2.1 ALH has a duty to take all reasonable steps to prevent and minimise harm from the operation of gaming machines in the approved venue, including by monitoring the welfare of gaming machine players, discouraging intensive and prolonged gaming machine play and intervening when a person is displaying behaviour that is consistent with gambling harm.

2.2 The following responsible gambling message will be displayed on our compliance boards (adjacent to cashier stations) in every venue:

“We are committed to providing responsible gambling. Whilst gambling is enjoyed by the majority of people responsibly, we acknowledge that problem gambling is a serious community issue and that a small proportion of customers are harmed by their gambling activities.”

“Our goal is to ensure we provide a safe and supportive environment where our customers can make informed decisions about gambling and appropriate assistance and information is available.”

“We want our gaming facilities to be enjoyed as a social recreation by responsible individuals who choose to use them.”

“We actively support the promotion and encouragement of responsible gambling.”

3. Interaction with guests – communications with gamblers

3.1 ALH team members (**team members**) must ensure that communications with guests do not:

- (a) Induce a person to enter or remain in the gaming machine area;
- (b) Induce gaming machine play (with the exception of communication that forms part of a lawful loyalty scheme);
- (c) Reinforce or encourage fallacies or misconceptions about gaming machines, including but not limited to;
 - i. Telling a person that he or she can make money playing a gaming machine;
 - ii. Telling a person that a gaming machine or gaming machine jackpot has or has not paid, or that it is due to pay winnings;
 - iii. Discussing luck or superstitions;
 - iv. Telling a person that a ‘near miss’ means the gaming machine is about to pay winnings;
 - v. Suggesting or encouraging the belief that a spin on a gaming machine is not independent of another spin on that gaming machine;
 - vi. Suggesting or encouraging the belief that there are strategies that a person can use to win when playing a gaming machine (for example, increasing or decreasing the amount bet per line or number of lines on which a bet is made); or

vii. telling a person that he or she deserves to win.

3.2 Team members must take reasonable steps to ensure that communications with guests discourage intensive and prolonged gaming machine play.

3.3 With the exception of EFTPOS signage, a venue operator must not induce a person to:

(a) Withdraw money, or withdraw more money, from a cash facility; or

(b) Leave the approved venue to obtain money, or obtain more money, to enable that person to play, or to continue to play, a gaming machine.

3.4 A venue operator may however direct a person to a cash facility when requested to do so by a customer.

4. Interaction with guests – Signs of Distress

4.1 Team members will take all reasonable steps to ensure the gaming machine area and entrances to the gaming machine area are monitored at all times gaming machines are available for gaming.

4.2 Team members will take all reasonable steps to ensure that guests in the gaming machine area are regularly observed to monitor behaviour that is consistent with gambling harm.

4.3 Team members will not encourage or induce a person to engage in intensive or prolonged gaming machine play.

4.4 Team members at venues will ask a person to take a break away from the gaming machine area where an interaction has occurred and that interaction has determined that the person is angry while gaming or has requested assistance as a consequence of their gaming.

4.5 Team members at venues will interact with a person who has been observed to have been playing gaming machines for a prolonged period without a break and ask that person to take a break away from the gaming machine area.

4.6 Team members at venues will interact with a person who:

(a) Has been asked to take a break and refuses to take a break away from the gaming machine area;

(b) Plays multiple gaming machines simultaneously;

(c) Reserves a gaming machine in order to play another gaming machine.

5. Gaming Venue team members

5.1 ALH team members are not permitted to gamble at a venue they are employed in at any time.

5.2 Venues will provide information to team members so that they are aware of their increased risk of harm from gambling.

6. Interaction with Problem Gambling Support Services

ALH will ensure that team members who have day-to-day management of the operation of venues and responsible gambling officers meet with the venue's nominated Venue Support Worker at least once every six months.

7. The Gambling Environment

7.1 Venues will not encourage a person to play multiple gaming machines simultaneously.

7.2 Venues will take all reasonable steps to discourage a person from reserving a gaming machine in order to play another gaming machine in the gaming machine area.

7.3 During the opening hours of food and beverage facilities outside the gaming machine floor, venues will ensure that a person can order and be served food and beverage without having to enter the gaming machine area.

7.4 Venues may offer a person seated at or playing a gaming machine food or beverage provided it is offered as part of an interaction with that person.

8. Responsible Gambling Officer (RGO)

8.1 ALH will nominate RGOs for its approved venue(s).

8.2 An RGO will be available in the gaming machine area at all times gaming machines are available for gaming.

8.3 Venues will display prominently in the gaming machine area a notice advising that an RGO is available for assistance at all times.

8.4 A venue's RGO will take all reasonable steps to:

- (a) Monitor the gaming machine area and ensure compliance with the Act, regulations and this code;

(b) Ensure that team members record responsible gambling incidents and interventions in the responsible gambling register;

(c) Observe guests who display behaviour that is consistent with gambling harm and provide assistance as necessary;

(d) Provide advice to team members about gambling harm and how to respond to signs of gambling harm; and

(e) Respond to guest enquiries and complaints about the supply of gambling in the approved venue.

8.5 A venue's RGO will complete prescribed responsible service of gambling training, if any.

9. Responsible Gambling Register

9.1 Venues have established and maintain a responsible gambling register and ensures that details of all responsible gambling incidents and interventions are recorded in this register, including:

(a) Date and time the incident occurred;

(b) Details of the incident;

(c) Details of the intervention made in response to the incident;

(d) Details of the customer's response to the intervention, if known;

(e) Date and time the entry was recorded in the responsible gambling register; and

(f) The name of the individual if this is provided voluntarily by that individual.

9.2 Venues retain the information in the responsible gambling register for not less than six months from the day it was recorded in the responsible gambling register.

9.3 Venues will provide a copy of the responsible gambling register to the VGCCC on request.

9.4 Venues may provide information in the responsible gambling register to a Venue Support Worker for training and development purposes provided that information does not include the name or identifying characteristics of any person.

10. Definitions

Unless the context otherwise requires or the contrary intention appears, terms defined in the Act have the same meaning.

The following terms have the following meaning in this Code:

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

Code has the meaning given to it in section 1.

Code administrator refers to Australian Leisure and Hospitality Group Pty Limited, who have prepared and administer this code.

Interaction means measured assistance based on a case-by-case assessment by venue team members, including the assistance outlined in section 8.

Loyalty program means a 'loyalty scheme' as defined in section 1.3 of the Act.

VGCCC means Victorian Gambling and Casino Control Commission

Disclaimer

If any part of this Code becomes invalid due to legislative change, the other parts shall remain valid and remain in force. Any State or Federal legislation or regulatory arrangements take precedence over the contents of this code.