

Responsible Gambling Code of Conduct

Insight Holdings Consolidated Pty Ltd
(ACN 55 111 803 475)

This code is available at Insight's website www.insightccs.com.au or by request to Insight's Responsible Gambling Officer on 1300 733 757.

Responsible Gambling Message

Insight Holdings Consolidated Pty Ltd is committed to responsible gambling in raffles and lotteries conducted in support of community and charitable organisations. Insight and its charitable clients believe that raffles are effective for fundraising but that support must be provided in a way which allows supporters to make informed choices when participating.

The holder of the Commercial Raffle Organiser's Licence is Insight Holdings Consolidated Pty Ltd (Insight). Insight will comply with all rules and policies contained in this Code and will use its best endeavours to ensure that contractors or service providers also comply with these requirements.

Availability of Responsible Gambling Code of Conduct

This code in written form is available on request to 1300 733 757, and may be seen at our raffle client's websites and at Insight's web site www.insightccs.com.au

This code is available for all Insight staff in Insight's employee manual.

Responsible Gambling Information

Insight and its charitable clients want you to know:

In order to gamble responsibly you can take the following steps.

1. Understand the financial commitment you are making and whether you can afford that commitment.
2. Read the invoice, receipt and or ticket voucher you receive from us.
3. Consult the raffle rules which are available to you at the place and date of the draw and are available at our web site.

A supporter or potential supporter may contact Insight via our website, via email to c.service@insightccs.com.au and telephone on 1300 733 757 and additional information and support about responsible gambling may be available from the following sources:

www.problemgambling.vic.gov.au or by phoning GamblersHelp on 1800 858 858.

www.wesleymission.org.au

If you believe that your commitment to gambling is unhealthy, you are free to contact Insight at any time prior to the raffle draw date to change or cancel your commitment or to decline to take further calls.

Insight's Responsible Gambling Officer: Administration Manager
andrew.salmon@insightccs.com.au 02 9215 1623

Gambling Product Information

The raffle terms and conditions are available on the website of each charitable client for which we are selling entries subject to this code. That information will also be available on Insight's website.

Information available to potential and new supporters includes how to enter and the number of entries which may be available from which an estimate of the chances of winning can be made.

Interaction with Customers

If a customer indicates that he or she has a gambling problem, staff will decline to accept major purchases. In addition staff members may suggest that the customer call us back at a time which suits them or be offered the opportunity for us to call that person back which may act as a cooling off period.

Where a large purchase is detected a call back to the supporter will occur to ensure that the purchase is intended.

Insight training staff regularly assess support services which may be needed, availability of written material, and referral to support services. New staff are trained on the importance of responsible gambling and the availability of support services.

At all times the raffle activities are supervised by staff who know how to provide information about the code of conduct and responsible gambling and how to act upon requests arising from the code.

Interaction with Staff

The Call Centre Manager (in consultation with the Responsible Gambling Officer) is the main point of contact for Insight staff who request information or help with a gambling problem or show any of the indicators of a gambling problem. The Responsible Gambling Officer will ensure that any staff member who requests information, or shows any of the indicators of a gambling problem, is directed to the counseling services for problem gambling referred to elsewhere in this code.

Staff of Insight are not permitted to participate in raffles run by Insight unless they or their family are approached directly as a result of our telemarketing.

The privacy of any staff member, or member of their family, who requires access to the services within this code will be respected at all times.

Interaction with Problem Gambling Support Services

The Responsible Gambling Officer will contact and collect available resources for problem gambling on a regular basis (that is at least twice each year) from Gambler's Help and the Wesley Mission in NSW. This information will be communicated to staff, and made available for use with / distribution to customers, as soon as practicable after it is received.

Customers Complaints

This Complaint Policy has been adopted by Insight and its charity clients for the management of complaints and feedback. This policy applies to all complaints relating to our activities in the

community, including any complaints relevant to responsible gambling matters and the rules and guidelines contained within this code.

A complaint may be made to Insight or its charity clients in relation to its calling, a raffle or a donation. A complaint may be directed to Insight via telephone, letter, email or fax. All complaints received will be acknowledged or resolved within 48 hours. Each complaint, however communicated, will be recorded in a complaint log and referred to the appointed Complaints Officer.

In resolving a complaint the following steps shall be followed by Insight:

- a. record the particulars of the complaint in a manner which respects the privacy of the complainant and investigates the circumstances including all parties involved.
- b. address with the complainant any part of the complaint which can be addressed right away or inform the complainant when within 21 days a response will be provided
- c. refer any complaint which cannot be handled right away to the appointed manager for review.

All complaints will be resolved or referred within 21 days of receiving that complaint.

Insight or its charity client, may resolve complaints using some or all of the following options:

1. providing an explanation of the circumstances of any complained about conduct to the customer.
2. offer a refund of a payment in circumstances where; the person is entitled to a refund in line with applicable consumer legislation or any other reasonable basis.
3. offer referral to external assistance including, problem gambling services, ACMA, VCGR, the Independent Association of Arbitrators and Mediators of Australia or other regulatory contact
4. offer an apology for any hurt or distress and if required any measures to be taken to avoid repetition.

A record of the complaint and how it was handled will be provided to the VCGR upon request.

Compliance with the prohibition of gambling by minors

Insight will not knowingly permit entry to its client's raffles to persons under the age of 18 and will take reasonable steps to qualify the age of potential supporters prior to the purchase of raffle entries. Insight will not target a promotion or sales campaign at minors and will not knowingly sell raffle entries to minors.

The Gambling Environment

Approaches to potential supporters and raffle sales for Insight's clients are regulated by State and Federal laws and policies with which Insight strives to comply at all times.

To avoid disadvantage to supporters via problem gambling, Insight: reviews all telephone purchases in excess of \$400 by telephone verification within 24 hours of the purchase, detects patterns of repeated or large purchases [over \$1,000 in 6 months], actively discourages and counsels against pressure sales techniques, and offers information about the raffle entry purchase and options to raffle supporters. People we speak to are given a phone number to contact us at any time to cancel or amend their raffle entry purchase or donation.

Financial Transactions

Insight and its clients permit the payment for entries by cheque, BPay, credit card, direct debit and money order. Insight does not provide any credit facilities to raffle participants beyond credit card payment for participation in its client's raffles.

Responsible Advertising and Promotions

Any advertising and promotions related to a raffle undertaken by Insight on behalf of any Client will:

- (a) comply with the advertising code of ethics adopted by the Australian Association of National Advertisers.
- (b) not be false, misleading or deceptive about odds, prizes or the chances of winning
- (c) have the consent of any person identified as winning a prize prior to publication
- (d) not be offensive or indecent in nature
- (e) not create an impression that gambling is a reasonable strategy for financial betterment
- (f) not promote the consumption of alcohol while purchasing gambling products.

Insight will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

Processes and Structures to Support the Ongoing Implementation of the Code.

1. Responsible Gambling matters will be a standing item for Board and staff meetings
2. A Responsible Gambling Officer will be identified from among senior staff to:
 - a. Handle more difficult customer contacts
 - b. Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers.
 - c. Induct new staff members to ensure they are informed about responsible gambling issues and the Code
 - d. Handle responsible gambling issues raised by staff
 - e. Identify staff worthy of reward and recognition for their responsible gambling efforts

Code Review Process

1. Insight's Responsible Gambling Code of Conduct will be reviewed each year on the anniversary of its commencement.
2. Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code.
3. A report of the review will be provided to the VCGR by 30 June each year or longer period allowed by the VCGR.