

Rafflelink Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct

We, Glacier Park Group Pty Ltd operating as “Rafflelink” ensure our Code of Conduct is accessible to all customers by making it available on the Rafflelink website at rafflelink.com.au. Additionally, requests for the Code can be made by contacting Edward He at eddie@rafflelink.com.au or by phone at 0404395826

2. Responsible Gambling Message

Our responsible gambling commitment is central to our operations. We prominently display our responsible gambling message:

"At Rafflelink, we are deeply committed to promoting and ensuring responsible gambling practices. We understand that gambling, even in the form of raffles, should be conducted in a manner that prioritizes the well-being and safety of our customers. Our approach is centered on providing a transparent, fair, and enjoyable gambling experience, while actively supporting and uplifting community and charitable organizations."

We take concrete steps to ensure that our gambling activities do not contribute to problem gambling. This includes providing clear information on the risks associated with gambling, offering tools and resources to help customers gamble responsibly, and ensuring easy access to support services for those who may need assistance. Our goal is to create a gambling environment that is both socially responsible and enjoyable, fostering a culture where responsible gambling is the norm and the welfare of our customers and the community is at the forefront of our operations."

This message is visible on our website, all promotional materials, and communicated to customers on hold during phone interactions.

3. Responsible Gambling Information

At Rafflelink, we are committed to promoting responsible gambling practices. To support this commitment, we provide the following practical tips on our website and in all our communications to help our customers gamble responsibly:

- **Setting Spending Limits:** Before purchasing raffle tickets, decide on a budget and stick to it. It's important to only gamble with money you can afford to lose.
- **Time Management:** Be mindful of the time spent on gambling activities. Set a time limit for your ticket purchasing activities and adhere to it.
- **Avoid Chasing Losses:** If you don't win, avoid the temptation to continue purchasing tickets in an attempt to recover lost money. Remember, gambling should be considered a form of entertainment, not a way to make money.
- **Balanced Participation:** Ensure that gambling does not become your exclusive or predominant pastime. Balance your gambling activities with other hobbies and social interactions.
- **Recognizing and Managing Triggers:** Be aware of emotional or situational triggers that may lead to excessive gambling, such as stress or peer pressure, and develop strategies to manage these.
- **Seeking Support:** If you feel you might be developing a problem with gambling, seek help immediately. Contact details for gambling support services are available on our website.
- **Self-Exclusion:** We provide a self-exclusion program for those who wish to restrict their access to our raffle services. Details on how to self-exclude, revoke a self-exclusion, or vary the terms of self-exclusion are clearly outlined on our website and available upon request.

At Rafflelink, we do not provide credit or lend money for the purposes of purchasing raffle tickets.

At Rafflelink, we recognize the importance of offering accessible support for those who may need assistance with gambling-related issues. Below are the key contact details for gambling support services in Victoria, Australia:

Gambler's Help

- Phone: 1800 858 858 (Free, 24/7 helpline)
- Website: gamblershelp.com.au
- Services Offered: Confidential advice and support, including counselling services, self-exclusion programs, and financial advice specific to gambling issues.

Victorian Responsible Gambling Foundation

- Phone: (03) 9452 2600
- Website: responsiblegambling.vic.gov.au
- Services Offered: Resources and information on responsible gambling, community education, and support services.

Lifeline Australia

- Phone: 13 11 14
- Website: lifeline.org.au
- Services Offered: 24/7 crisis support and suicide prevention services, including support for gambling-related distress.

Financial Counselling Australia

- Phone: 1800 007 007 (Free financial counselling service)
- Website: financialcounsellingaustralia.org.au
- Services Offered: Financial counselling for individuals facing financial difficulties, including those related to gambling.

We encourage anyone who feels they need help to reach out to these services.

4. Gambling Product Information

The terms and conditions for the conduct of a raffle will be printed on the ticket and/or information material designed to promote the raffle, and the Rafflelink website at rafflelink.com.au or by request to:

Edward He at eddie@rafflelink.com.au

This information will include how to enter and the odds of winning the stated prizes based on the total possible ticket sales.

5. Customer Loyalty Scheme Information

We do not offer a customer loyalty scheme.

6. Interaction with Customers

Identifying and Assisting Customers with Gambling Concerns:

We actively monitors customer interactions and ticket purchase patterns through our access to every raffle sales database. We keep a vigilant eye on customers displaying extreme volume ticket purchases. Our clients are grassroots fundraisers with ticket prices typically low, averaging around \$2 and not exceeding \$5 each.

Promoting Reflection During In-Person Promotion:

When promoting our raffle website for ticket purchases in person, our staff will encourage potential purchasers to take a moment to reflect on their decision. We suggest they consider whether they wish to purchase tickets and, if so, the number of tickets they intend to buy. This 'cooling-off' period is designed to promote mindful decision-making and prevent impulsive purchases.

Providing Immediate Assistance and Options for Cooling-Off:

During the ticket purchase process, both online and in person, we remind customers about responsible gambling practices and provide the Free Gambling Helpline phone number 1800 858 858.

Our Terms & Conditions, available online, include a section on responsible gambling and detail the options for a 'cooling-off period', including how to amend or cancel credit card purchases.

Direct Intervention and Self-Exclusion Process:

If a customer is identified as making extreme volume ticket purchases, we will reach out discreetly to offer support and discuss options like setting spending limits or self-exclusion.

Our self-exclusion program is easily accessible and includes options to temporarily block access to our services or take a complete break from gambling.

Privacy, Respect, and Follow-Up:

All interactions with customers are conducted with utmost respect for their privacy. Our staff are trained to be sensitive and supportive.

We maintain regular follow-up communications with customers who have shown gambling concerns, offering ongoing support and resources.

Continuous Monitoring and Staff Training:

We, Rafflelink, commit to continuous monitoring of gambling patterns and regularly updates staff training to ensure effective identification and intervention strategies are in place.

7. Interaction with Staff

Staff are prohibited from purchasing raffle tickets being sold through Rafflelink.

A nominated manager/supervisor of Rafflelink will assist a staff member who requests it, with information about help with a gambling problem. This information will include referral details to a Gambler's Help telephone service and/ or information materials prepared by Gambler's Help services. This will be done away from the general work area and in such a way as to protect the staff member's privacy.

Staff members who are displaying indicators of distress that may be related to problem gambling (not confined to raffle purchases) will be offered the above information and assistance.

8. Interaction with Problem Gambling Support Services

The Manager or a senior staff member of Rafflelink will contact Gambler's Help services twice a year to obtain updated publications and any changes to contact details or available services. This information will be communicated to staff, and made available for use with customers, as soon as practicable after it is received.

9. Customer Complaints

How to Make a Complaint:

Customers can lodge a complaint with Rafflelink in writing by emailing eddie@rafflelink.com.au or by sending a letter to Rafflelink, PO Box 6758, Upper Mount Gravatt, QLD 4122. Complaints can also be made via phone call to [Australian Phone Number TBD]

The complaint should include the customer's name, contact information, a detailed description of the complaint, and any relevant ticket or transaction numbers.

Complaint Resolution Process:

Upon receipt of a complaint, it will be acknowledged within 48 hours.

The complaint will first be reviewed by our Customer Service Manager. If needed, it will be escalated to a higher-level manager or a designated complaints officer for further investigation.

We aim to resolve all complaints within 21 days from the date of acknowledgment. The customer will be kept informed about the progress, outcome, and resolution of the complaint through written notifications.

Independent Review Process:

If a complaint is not resolved to the customer's satisfaction within our internal process, it can be escalated to an independent review.

Independent reviews will be conducted by the Australian Dispute Resolution Association (ADRA), which has no business association with Rafflelink and is recognized for its authoritative role in dispute resolution within various industries.

Customers seeking an independent review can contact ADRA through their website at www.adra.org.au or via phone at (02) 9802 2015. ADRA will provide impartial mediation to ensure a fair resolution of the complaint.

Collection and Retention of Complaint Information:

All complaints and their resolutions will be documented and securely retained by Rafflelink on its internal servers.

This information will include the nature of the complaint, steps taken to resolve it, and the final outcome. It will be stored in a manner that respects the privacy of the complainant.

Compliance Monitoring:

Records of all complaints and their outcomes will be made available to the Victorian Gambling and Casino Control Commission (VGCCC) upon request, to enable monitoring of compliance with the complaints process.

We will also provide an annual report to the VGCCC detailing the number of complaints received, their nature, and how they were resolved.

10. Compliance with the prohibition on gambling by minors

Preventing Sales to Minors:

We strictly prohibits the sale of raffle tickets to minors. We ensure this by implementing the following measures:

- All promotional and sales campaigns are designed and targeted to exclude minors. This includes age-appropriate marketing material and avoiding channels predominantly used by minors.

- On our website, where raffle tickets are primarily sold, age verification checks are in place. Customers are required to confirm their age before proceeding with the ticket purchase.
- During any phone sales or in-person transactions, our staff are trained to request proof of age when there is any doubt about the customer's age.

Method of Ticket Sales and Protections:

Website Sales: Our online platform is equipped with age verification processes where customers must declare they are over 18 years of age.

In-Person Sales: In situations where tickets are sold in person, staff are trained to check identification for any purchaser who appears to be under the age of 25.

Telephone Sales: For ticket sales over the phone, customers are asked to confirm their age. In cases of doubt, further verification is sought by asking for date of birth and potentially additional identity verification questions.

Training and Compliance:

All Rafflelink staff members undergo rigorous training to identify and prevent sales to minors. This includes understanding the legal implications and learning how to effectively implement age-verification techniques.

Regular audits and compliance checks are conducted to ensure that these measures are strictly followed.

Monitoring and Enforcement

We, Rafflelink, monitor our sales channels continuously for any signs of breach in the prohibition of sales to minors.

Any breaches or attempted breaches are recorded, and appropriate actions, including reporting to regulatory authorities, are taken.

11. The Gambling Environment

Discouraging Extended and Intensive Gambling Behaviors:

Setting Purchase Limits: We have established limits on the number and value of tickets an individual can purchase. These limits are anchored around the historical and average purchase volume and value of an individual and around the historical and average purchase volume and value of similar cohorts and the general population. The set limits are designed and used to advise our staff to identify and prevent excessive gambling behavior.

Monitoring and Intervention: We actively monitor ticket purchasing patterns through our sales database. If a customer reaches the advised limits or shows a pattern of excessive purchasing, we will take the following steps:

- The customer's account will be flagged, and after we carefully review, we may temporarily suspend the customer's account to prevent them from making further purchases.
- Our customer service team will reach out to the customer to discuss their purchasing patterns and provide information on responsible gambling practices.
- If necessary, we will offer the option of self-exclusion or direct the customer to appropriate gambling support services.

Making Customers Aware of the Passage of Time:

- We plan to implement automated reminders and alerts to notify customers when they have been active on the site for an extended period. These reminders encourage customers to take breaks and reflect on their gambling activities.

Training and Compliance:

- Our staff receive ongoing training on identifying and intervening in cases of extended and intensive gambling.
- Compliance with these measures is regularly audited to ensure effectiveness in promoting a responsible gambling environment.

12. Financial Transactions

No Cashing of Cheques or Credit Extension:

At Rafflelink, we do not cash customers' cheques or extend credit for the purchase of raffle tickets. This policy is in place to promote responsible gambling and financial management among our customers.

Notification to Customers:

Customers will be explicitly informed of our no cheque cashing and no credit extension policy at the point of sale, both on our website and during any in-person or telephone transactions. This information is also included in our terms and conditions.

Payment of Winnings:

Regarding the payment of winnings, we adhere to the legal requirements of Victoria. Cash prizes are not offered, except where cash may constitute up to 10 percent of a travel prize.

For all other prizes, we provide clear information on the type of prize, how it will be delivered or collected, and any necessary steps winners need to take to claim their prize.

This information is detailed on the raffle tickets, on our website, and in the promotional materials for each raffle.

Accessibility of Financial Transaction Rules:

The complete rules and guidelines relating to financial transactions, including ticket purchase methods and prize claim procedures, are permanently accessible on our website.

A dedicated section titled 'Financial Transaction Rules' is provided under the terms and conditions on our website, ensuring customers can easily access and understand these rules at any time.

13. Responsible Advertising Promotions

Adherence to Advertising Standards:

We are committed to adhering to the highest standards of advertising ethics as outlined by the Australian Association of National Advertisers. We ensure our advertising and promotions are truthful, not misleading or deceptive about odds, prizes, or the chances of winning.

Specific Measures for Compliance:

Pre-Publication Review: All advertising and promotional materials undergo a thorough pre-publication review process. This ensures accuracy, ethical messaging, and compliance with legal and responsible gambling standards.

Advertising Checklist: We utilize a comprehensive advertising checklist to verify each piece of content. This checklist includes criteria such as truthfulness, respect for consumer experience, and non-exploitation of vulnerable groups.

Approval by Our Board of Directors: Each advertisement or promotional material requires approval by our Board of Directors. This step ensures an additional layer of scrutiny and accountability for all our marketing efforts.

Regular Training: Our marketing and advertising teams are provided with regular training to remain informed and compliant with current regulations and ethical standards in advertising.

Review of Client Raffle Pages:

Before activating any client raffle pages, we conduct a detailed review to ensure they align with our responsible advertising principles. This includes assessing the content for accuracy, responsible messaging, and compliance with our ethical standards.

Promotion Content Guidelines:

Our promotions do not imply that gambling is a reasonable strategy for financial betterment or associate gambling with alcohol consumption. We ensure the consent of identified winners in our promotional content and maintain respectful, non-offensive, and indecent nature in our advertisements.

Continuous Monitoring and Evaluation:

We continuously monitor the effectiveness of our advertising standards through regular audits and evaluations of our advertising campaigns, ensuring they uphold our commitment to responsible advertising.

Transparency and Accessibility:

Details about our advertising policies and standards are readily available on our website, promoting transparency and enabling public accountability.

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. Rafflelink's Code 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.

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