

UNITY4 CONTACT CENTRE OUTSOURCING PTY LTD
RESPONSIBLE GAMBLING CODE OF CONDUCT

1. Availability of the Responsible Gambling Code of Conduct

The Code is available on the Unity4 Contact Centre Outsourcing Pty Ltd website at www.unity4.com or by request to company director Daniel Turner or Geoff Moore, General Manager on 03 8414 5600.

2. Responsible Gambling Message

Unity4 Contact Centre Outsourcing Pty Ltd is committed to selling raffle tickets responsibly to support community and charitable organisations. This message will be displayed on Unity4 Contact Centre Outsourcing Pty Ltd website and on material developed by Unity4 Contact Centre Outsourcing Pty Ltd for the promotion and conduct of raffles on behalf of community and charitable organisations.

A responsible gambling message is available to any customers placed on hold prior to or during a telephone contact.

3. Responsible Gambling Information

Information about the following is available on the Unity4 Contact Centre Outsourcing Pty Ltd website at www.unity4.com or by request to either of the above named individuals on 03 8414 5600.

- how to gamble responsibly, e.g. decide before you buy how much you want to spend
- the availability of gambling support services
- restrictions that apply to the provision of credit or the lending of money by Unity4 Contact Centre Outsourcing Pty Ltd for the purposes of purchasing raffle tickets.

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 Unity4 Contact Centre Outsourcing Pty Ltd website at www.unity4.com or by request to:

Geoff Moore

03 8414 5600

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

Refer to the definition of 'customer loyalty scheme' in the Minister's Direction. If the CRO offers such a scheme, the relevant details should be included here.

6. Interaction with Customers

Unity4 Contact Centre Outsourcing Pty Ltd telephone staff will assist customers who request 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. In addition for customers who have indicated that they have a gambling problem or where a canvasser forms the view from the caller that a caller may be over extending themselves financially:

- Telephone canvassers will offer to end the call/call back later if the customer wishes to continue with their ticket purchase (cooling off period)
- Provide a telephone number whereby credit card purchasers could amend or cancel their order (cooling off period)
- Where tickets are sold in person suggest that the purchaser take a moment to reflect on whether they wish to purchase tickets/ as many tickets [cooling off period]
- Where tickets sold by mail an upper limit 5 books will be issued to a customer to purchase/sell at any one time.

Staff will ensure that interaction with customers occurs in a manner that respects the customer's right to privacy.

7. Interaction with Staff

Staff are/are not permitted to purchase raffle tickets being sold by Unity4 Contact Centre Outsourcing Pty Ltd.

A nominated manager/supervisor of Unity4 Contact Centre Outsourcing Pty Ltd 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 Unity4 Contact Centre Outsourcing Pty Ltd 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

Complaints may be made by telephone to [Free call number] or by letter sent to:

General Manager

Unity4 Contact Centre Outsourcing Pty Ltd

Level 1, 79 Maroondah Highway

Ringwood VIC 3134

The details of each complaint are entered into the Complaint Register with a record of the outcome of each complaint.

When complaints are received by telephone they are referred to the Operations Manager. The Operations Manager will endeavour to resolve the issue at this time.

When complaints are received by mail, we aim to respond to these letters within one business day of receipt. If we need to investigate the issue further, we aim to resolve it within five business days.

While the issue is being investigated, Unity4 Contact Centre Outsourcing Pty Ltd will provide updates on resolution progress.

If a customer is not satisfied with the resolution or the investigation of the issue, it will be escalated to the General Manager. The General Manager will deal with the customer personally to discuss the issue and the resolutions that have been offered.

If Unity4 Contact Centre Outsourcing Pty Ltd remains unable to resolve the complaint to the customer's satisfaction, the matter will be referred to an independent mediator, such as the Institute of Arbitrators and Mediators (www.iama.org.au) and costs will be equally shared between both parties.

Records of complaints and decisions will be made available upon request to the VCGLR.

10. Commitment to discourage gambling by minors

Unity4 Contact Centre Outsourcing Pty Ltd does not encourage early gambling habits in children. Unity4 Contact Centre Outsourcing Pty Ltd will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors. Staff will take reasonable steps to ascertain the age of the customer prior to the purchase of raffle tickets.

Unity4 Contact Centre Outsourcing Pty Ltd will not supply a prize of a raffle which includes liquor (or any other product that cannot be legally purchased by a minor) to a minor.

11. The Gambling Environment

Unity4 Contact Centre Outsourcing Pty Ltd will discourage repeatedly excessive purchase of tickets by customers. To achieve this Unity4 Contact Centre Outsourcing Pty Ltd will:

- Set a limit on the quantum or value of tickets to be sold to an individual
- Check data base of regular ticket purchasers to detect a pattern of excessive purchase
- Not engage in hard/pressure sales techniques.

12. Financial Transactions

Unity4 Contact Centre Outsourcing Pty Ltd will not cash customer's cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time if they request such a service.

Prizes of cash are not permitted in Victoria by law except that cash may form up to 10 percent of a travel prize.

13. Responsible Advertising Promotions

Any advertising and promotions undertaken by Unity4 Contact Centre Outsourcing Pty Ltd in relation to a raffle will:

- Comply with the advertising code of ethics adopted by the Australian Association of National Advertisers
- Not be false or misleading or deceptive about odds, prizes or the chances of winning

- Have the consent of any person identified as winning a prize prior to publication
- Not be offensive or indecent in nature
- Not create an impression that entering a raffle is a reasonable strategy for financial betterment
- Not promote the consumption of alcohol while buying raffle tickets.

Unity4 Contact Centre Outsourcing Pty Ltd will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

14. 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
 - f. Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers.

15. Code Review Process

1. Unity4 Contact Centre Outsourcing Pty Ltd 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 VCGLR by 30 June each year.