

TOUGHEST PROMOTIONS PTY LTD

(ACN 653 775 387)

Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct

The Code of Conduct is available:

- on the Toughest Promotions’ website at: <https://www.toughesttimes.com.au/responsible-gambling> (**Website**); or
- by request to Mr Paul Maric, Director, via email at: info@toughesttimes.com.au or by telephone at: 1800 953 050.

2. Responsible Gambling Message

Toughest Promotions are committed to selling raffle tickets responsibly to support community and charitable organisations. We are committed to providing an environment where customers can make an informed decision about their ticket purchases. This Code of Conduct forms part of that commitment and will be available on premises, on the Website and on material developed by Toughest Promotions for the promotion and conduct of raffles on behalf of community and charitable organisations.

Toughest Promotions acknowledge its responsibility in the shared nature of responsible gambling. The responsible gambling message “Play responsibly, have fun and know your limits” will be read out electronically when a person is placed on hold prior to or during a telephone contact. The responsible gambling message will also be displayed on the Website and at all places where the raffle tickets are sold.

We believe in the importance of generating awareness of the risks associated with gambling and creating and promoting environments that prevent or minimise problem gambling.

3. Responsible Gambling Information

Information about responsible gambling is available:

- on the Website at <https://www.toughesttimes.com.au/responsible-gambling>; or
- by request to Mr Paul Maric, Director via email at: info@toughesttimes.com.au or by telephone at: 1800 953 050.

The responsible gambling information which will be available on the Website is as follows:

- how to gamble responsibly, including options available to “take a break”, permanently self-exclude and set a spending limit, including the processes for this;
- contact details of Gambler’s Help Services; and
- restrictions that apply to cheque cashing and the availability of credit to customers.

These are set out further below.

Toughest Promotions believes It is important for customers to know their budget for purchasing tickets and to make an informed decision on how much they wish to spend.

Toughest Promotions provide links and resources to available gambling support services and information on the Website. The resources include:

- Victorian Responsible Gambling Foundation website: <https://responsiblegambling.vic.gov.au> or phone 1800 858 858
- <https://responsiblegambling.vic.gov.au>
- <https://www.gamblinghelponline.org.au>
- <https://gamblershelp.com.au/get-help/under-25s> or phone Youthline 1800 262 376
- <https://gamblershelp.com.au>
- <https://www.gambleaware.com.au>

A “take a break” request or permanent self-exclusion from Toughest Promotions is available to customers. Customers are able to make a request via email at: info@toughtimes.com.au or by telephone at: 1800 953 050 to restrict themselves from buying raffle tickets for a period of time or permanently if gambling has become an issue, or is causing others around them harm.

Customers can make a request to set a spend limit via email at: info@toughtimes.com.au or by telephone at: 1800 953 050.

Toughest Promotions may retain personal information, for as long as required, to effectively implement the above self-exclusion facilities. The following minimum personal information will be retained by Toughest Promotions where a customer closes their account:

- customer name;
- customer address; and
- customer payment details.

For more information on self-exclusion, contact Gambler's Help on 1800 858 858 or visit <https://www.gamblinghelponline.org.au/vic/local-support-services>.

4. Gambling Product Information

The terms and conditions for the conduct of a raffle will be printed on the electronic ticket and/or information material designed to promote the raffle, as well as the Website or by request to:

Mr Paul Maric, Director

- via email at: info@toughtimes.com.au; or
- via telephone at: 1800 953 050.

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

Toughest Promotions’ will not be offering any ‘customer loyalty scheme’, as defined in the Ministerial Direction.

6. Interaction with Customers

Toughest Promotions’ 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.

- Gambler’s Help Line 1800 858 858
- <https://responsiblegambling.vic.gov.au>
- <https://www.gamblinghelponline.org.au>
- <https://gamblershelp.com.au/get-help/under-25s> or phone Youthline 1800 262 376

Toughest Promotions will be regularly monitoring customer account activity in an effort to ascertain if any customers may be suffering from any harm caused by purchasing tickets. As part of this, Toughest Promotions will undertake a “health check” of customers from time to time which it suspects are suffering from gambling related harm.

Toughest Promotions’ telephone staff will also be interacting with customers who have requested information about, or assistance with, a gambling problem or self-exclusion by placing a block on the customer’s account, or closing it where required.

Toughest Promotions will provide customers with resources that provide accurate information and encourage them to think about their choices.

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 overextending themselves financially, canvassers will:

- offer to end the call/call back later if the customer wishes to continue with their ticket purchase;
- provide a telephone number whereby credit card purchasers could amend or cancel their order; and
- 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.

We understand that gambling related harm is difficult and often complex to detect. All customers seeking information from our telephone staff about help with a gambling related problem will be dealt with in a respectful manner. Toughest Promotions will also respect the customer’s right to privacy.

7. Interaction with Staff

Staff at Toughest Promotions are not permitted to purchase raffle tickets being sold by Toughest Promotions.

Toughest Promotions will support our staff in a confidential and appropriate manner.

Toughest Promotions will be regularly monitoring the health and welfare of all staff in an effort to ascertain if any may be suffering from any harm caused by selling tickets. Where one of our staff members is exhibiting observable signs of distress, or behaviour indicating difficulties managing their gambling, we will provide information on:

- Responsible Gambling tools and services; and
- how to access gambling support services and facilitate access to such services if required.

Toughest Promotions will also be interacting with staff who have requested information about, or assistance with, a gambling problem.

Toughest Promotions will interact with all staff in a manner that respects the staff member's right to privacy, for example taking steps to make sure any conversations are sensitively handled.

8. Interaction with Problem Gambling Support Services

The Manager or a senior staff member of Toughest Promotions will contact Gambler's Help services via email or phone at least twice per year (or more frequently as required) to ask for information in relation to any relevant updates or future updates to 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

If a customer wishes to lodge a complaint relating to Toughest Promotions, they should do so in writing and email this to: info@toughesttimes.com.au or through a phone call to: 1800 953 050. Details of the complaint should be provided in respect of each complaint lodged.

Toughest Promotions will acknowledge the lodged complaint as soon as reasonably practicable following receipt.

The complaints officer of Toughest Promotions will investigate the complaint as soon as reasonably possible and in any event within 21 days, and will take the following steps to resolve the complaint:

- Toughest Promotions will assess whether the complaint is a genuine complaint. Toughest Promotions will ensure parties are notified of the progression of the complaint and, following a determination by the complaints officer, are informed of the outcome through written notification. The outcome will detail the action and how the complaint is being treated and has been resolved.
- If the complaint is resolved by the complaints officer, no further action will be taken. If the complainant requests a review of the decision, the complaint will be directed to the Victorian gambling regulator as an independent body for investigation and resolution via their website <https://www.vgccc.vic.gov.au/iwant/complaints>.
- Toughest Promotions will keep all records of complaints and will document the following information:
 - when and how the complaint was made;
 - the complainant's personal details;
 - what the complaint was about;
 - how the complaint was resolved; and
 - all actions, decisions and interactions.
- Toughest Promotions will assess whether all parties have been treated fairly and reasonably in accordance with the Code of Conduct.
- If the review into the complaint is not resolved and further investigation is needed, information and feedback will be gathered from all relevant parties.

Should a complaint not be resolved through the above process, then the customer will be invited to participate in an independent mediation with the cost to be shared equally between both parties. The customer will be invited to resolve the issue and have the complaint heard by an independent body, such as the Institute of Arbitrators & Mediators Australia (IAMA) by calling 1800 651 650 or email: infoaus@resolution.institute

If the customer is still not happy with how Toughest Promotions handles the complaint, the Complaint may also be reported to the Victorian Gambling and Casino Control Commission (VGCCC) by calling 1800 182 457.

Records of complaints and decisions of any review process made in relation to the Code of Conduct will be held for a period of seven years and will be made available for inspection by the Minister or the VGCCC on request.

10. Commitment to discourage gambling by minors

Toughest Promotions will not knowingly sell raffle tickets to minors.

Toughest Promotions will take all reasonable steps to ensure that it only sells tickets to people over the age of 18+, including by utilising a third party service (where possible), such as GreenID or another service to verify that a person is not under the age of 18 years.

Toughest Promotions does not encourage early gambling habits in children.

Toughest Promotions will not target a promotion or sales campaign at minors.

Toughest Promotions 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.

We demonstrate our commitment to discourage minors from buying raffle tickets by displaying the message that “We do not sell raffle tickets to minors” on Toughest Promotions’ Website, online media, promotions or any sales campaigns.

11. The Gambling Environment

Toughest Promotions will discourage repeatedly excessive purchase of tickets by customers. To achieve this Toughest Promotions will:

- set a limit on the quantum or value of tickets to be sold to an individual and will use all reasonable endeavours to contact the customer when they have reached the value of tickets sold by phone or email;
- check the database of regular ticket purchasers to detect any pattern of excessive purchase;
- not engage in hard/pressure sales techniques;
- review customer’s purchase history on a monthly basis to take all reasonable steps to prevent excessive purchase of tickets; and
- provide an invoice or statement to the customer that shows the time and date tickets were purchased.

12. Financial Transactions

Toughest Promotions will not cash customer’s cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time by phone or email if they request such a service.

Toughest Promotions will be offering varying prizes that include cars, travel and gift vouchers. These will be delivered by Toughest Promotions to the winning customers.

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

Cash cannot be offered as an alternative raffle prize.

13. Responsible Advertising Promotions

Any advertising and promotions undertaken by Toughest Promotions 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 improvement;
- not promote the consumption of alcohol while buying raffle tickets;
- do not violate the confidentiality of information relating to, or the privacy of customers without the consent of the customer;
- not suggest that skill can influence raffle games that are games of chance; and
- not encourage excessive or reckless playing.

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

Toughest Promotions will provide training to staff and guidance materials to recognise any inappropriate advertising and promotions undertaken by Toughest Promotions.

Toughest Promotions will remove any advertising that is in contravention of applicable advertising standards including those specified by the Australian Association of National Advertisers.

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

Responsible Gambling matters will be a standing item for Toughest Promotions Board and staff meetings.

A Responsible Gambling Officer will be identified from among senior staff to:

- handle more difficult customer contacts;
- liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers;
- induct new staff members to ensure they are informed about responsible gambling issues and the Code of Conduct;
- handle responsible gambling issues raised by staff; and
- identify staff worthy of reward and recognition for their responsible gambling efforts

15. Code Review Process

Toughest Promotions' Code of Conduct will be reviewed each year on the anniversary of its commencement. Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code of Conduct.

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

Version: 1.1

Date last reviewed: