

GRAND CASINO

*Host Responsibility
Programme*

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1.0 Introduction

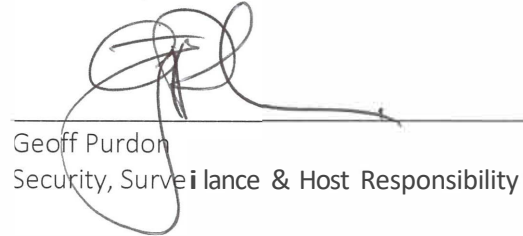
Approval

Effective date: 15/02/2024

Manager:



Dominique Dowding
Chief Executive Officer



Geoff Purdon
Security, Surveillance & Host Responsibility Manager

1.1 Statement of position

Statement of position

Grand Casino is committed to providing an environment that promotes safe gambling and is vigilant in preventing harm that can be caused by gambling. It provides a fun and safe environment for all customers and staff.

Grand Casino recognises that alcohol and gambling can be associated with harm for some of its customers. Grand Casino takes its role as a responsible host seriously and recognises that it has an important role to play in preventing and minimising alcohol and gambling-related harm for its customers and staff.

Grand Casino intends this Host Responsibility Programme to be a usable document for all staff which clearly sets out its obligations with respect to harm minimisation and prevention.

Compliance with legal obligations

The Programme has been developed by Grand Casino and addresses the host responsibility conditions in the Casino Operator's Licence held by Dunedin Casinos Management Limited.

Standard Operating Procedures (SOPs) developed by Grand Casino shall be consistent with and impose no lesser obligations than provided in the Gambling Act 2003 (the "Act"), Regulations, licence conditions or this Programme.

1.2 Programme objectives

Objectives

The principal objectives of the Grand Casino Host Responsibility Programme include:

- Preventing the onset of gambling and/or alcohol related harm and minimising gambling related harm for customers and other persons potentially affected by their gambling behaviour
- Facilitating responsible gambling.

Grand Casino aims to fulfil these objectives by:

- Providing effective staff training.
- Providing a safe gambling environment.
- Providing responsible marketing and promotional initiatives.
- Promoting the responsible consumption of alcohol; and
- Engaging effectively with stakeholders.

Outcomes

Grand Casino intends that implementation of the Programme will assist customers who may be experiencing harm as well as assist in preventing the onset of gambling and/or alcohol-related harm to those customers who may be at risk. Reporting requirements relating to the achievement of Programme objectives are set out in section 3.

2.0 Harm minimisation and prevention components

Introduction

Grand Casino will focus on addressing underlying causes of gambling and alcohol-related harm as well as taking steps to minimise harm.

Harm prevention and minimisation initiatives will be undertaken in the following areas:

- Policies and procedures.
- Host responsibility information for customers.
- Employee gambling-related harm.
- Stakeholder engagement.
- Environmental design.
- Provision of safe gambling environments.
- Marketing practices.
- Display of signage and provision of gaming information to customers.
- Learning and development.
- Identification of problem gamblers.
- Gambling limitation.

The Programme's requirements for each area are outlined further below.

Roles and Responsibilities

Frontline staff at Grand Casino are:

- Chief Executive Officer.
- All staff who have contact with customers (e.g., Gaming, F&B, Cash Desk, Housekeeping, Customer Services, Marketing and Security).
- Surveillance staff.
- Responsible Gambling Hosts (RGH).

Authorised Persons at Grand Casino are:

- Chief Executive Officer.
- Compliance Manager.
- Security, Surveillance & Host Responsibility Manager.
- Security, Surveillance & Host Responsibility Shift Managers.
- Acting Security, Surveillance & Host Responsibility Shift Managers.
- Acting Security Manager.
- Gaming Operations Manager.
- Gaming Shift Manager.
- AML Compliance Officer
- Cage Manager.
- Acting Gaming Shift Manager.
- Area Manager.
- Acting Area Manager.
- Host Responsibility officers.

The authorised persons are HR2 trained and undertake exclusions, interventions, and interactions with patrons.

The Host Responsibility function at Grand Casino is managed by the Security, Surveillance & Host Responsibility Manager, and the Compliance Manager.

This role includes the following:

- Collecting, collating, recording and analysing all information relating to indicators of problem gambling.

- The collection and management of information, and observations concerning problem gambling, including dealing with problem gambling indicators, staff observations, patron interviews and third-party inquiries.

Interacting with customers, including:

- The provisions of information and advice to patrons who Grand Casino considers may be problem gamblers.
- Offering self-exclusion from the casino or enforcing exclusion; referring patrons to problem gambling counsellors; and
- Evaluating excluded patrons who wish to come back to the casino after an exclusion period has concluded:
 - Staff training about host responsibility.
 - Engaging with service providers, researchers, and regulators.

References in Grand Casino's Host Responsibility Programme and Problem Gambler Identification Policy to "Host Responsibility", "Host Responsibility staW" and "the Host Responsibility team" denote the function managed by the Security, Surveillance & Host Responsibility Manager.

The RGH's are part of the Host Responsibility team, and their core role is to interact with the customers in the Casino with a particular emphasis on identifying any signs of "harm" occurring. They report to an Authorised person.

After the first hour of opening, the RGH will speak to all uncarded players and thereafter, at every four hours to ensure their wellbeing and check for any signs of harmful gambling.

An Authorised person is always on-site when the Casino is open to the public.

2.1 Policies and procedures

Policies and Procedures

The following policies and procedures have been developed to provide operational guidelines on the implementation of aspects of the Grand Casino's Host Responsibility Programme. The policies and procedures are consistent with the Act, Regulations, licence conditions and this Programme, and will be updated to reflect changes.

Policies

- Problem Gambler Identification Policy

Standard Operating Procedures:

The following SOPs relate to harm prevention and minimisation activities. An overview of how these procedures are put into practice is shown below.

- Exclusion
- Responsible Service of Alcohol
- Unattended Children
- Underage Persons
- Standard of Dress and Behaviour
- Long hours of play
- Gambling Limitation

The following SOPs relate to the Problem Gambler Identification Policy.

- Information Collection and Collation
- Analysis and Intervention
- Indicators of Problem Gambling
- Exclusion

2.1.1 Exclusion

Introduction

Grand Casino offers two types of exclusions:

- Self-Exclusion; and
- Grand Casino Identified Exclusion.

Grand Casino provides the facility for Self-Exclusion of customers from the casino for a specific period between three and twenty-four months and until they meet re-entry conditions imposed by Grand Casino or by regulations made under section 316(1)(e) of the Act. A customer may request and undertake Self Exclusion for a range of reasons, for example, where the customer has self-identified as a problem gambler or where the customer chooses to prevent or limit opportunities for harm to occur. The Self Exclusion process may also be initiated by problem gambling treatment providers or other venues where there are multi-venue exclusion arrangements in place.

Grand Casino Identified Exclusion is for a period of up to two years and the customer must also meet re-entry conditions.

Grand Casino Identified Exclusion is undertaken where a problem gambler does not take up Self Exclusion, and Grand Casino determines that the customer or his or her family or wider community is or may be experiencing harm as a consequence of that person's gambling behaviour. Grand Casino imposes such an exclusion when it has been determined that the customer is a problem gambler (in line with the definitions in the Act) and unable to continue gambling without further harm. This determination is generally made based on assessment(s), provision of information, advice, and assistance, monitoring of a GOI file, and refusal of Self-Exclusion offer or other host responsibility efforts to assist the customer to gamble without harm. Grand Casino may also impose exclusion after serious one-off incidents where an offer of Self-Exclusion has been refused.

Conditions for re-entry are contained in the Exclusion SOP.

Approaches to customers

Only Authorised trained staff may undertake exclusions with customers. This is generally one of the Authorised Persons.

Features of the Exclusion Process

To ensure the effectiveness of the Exclusion process, the following are features of the process:

Communication

- Will use all reasonable efforts to provide a translation service.
- Provides support to Excluded customers through provision of materials from problem gambling counselling service providers, and contact details.
- Provides brochures in appropriate languages.

Third parties and service providers

- Emphasises culturally appropriate processes and, wherever possible and appropriate, encourages families and/or friends to accompany the customer.
- Encourages third party involvement i.e. that a mentor is nominated who can be contacted on the progress of the Excluded customer and during any discussion relating to re-exclusion or re-entry.
- Encourages the Excluded customer to nominate a counselling service.
- Arranges for the counselling service to call the Excluded customer if the Excluded customer agrees.
- Encourages the Excluded customer to contact the counselling services as soon as possible after their exclusion.

Other measures

- Provides an updated database that is accessible to Security and Surveillance staff, as well as Gaming Managers and Acting Gaming Managers, to ensure detection of customers breaching an Exclusion order.
- Promotes ongoing dialogue with counselling service providers to continually improve the Exclusion process.
- Provides the customer with an opportunity to immediately redeem all loyalty points for rewards and suspends sending all loyalty information to the customers.
- Requires timely action from staff if a customer approaches, requesting Self Exclusion, with best endeavour made to ensure that approaches are responded to while the customer is on the premises or phone.
- Provides the opportunity for customers for off-site Self-Exclusion procedures, e.g. problem gambling service providers can mail in requests for Exclusions.

Breaches

Grand Casino staff are required to be vigilant for any Excluded customer who attempts to re-enter the casino. Grand Casino Security/Surveillance Managers or other Authorised Persons enforce the Exclusion process and take action against those detected committing a breach of the Exclusion process. Customers discovered attempting to do so may be warned, further excluded for an additional period, or issued a Trespass Notice. The Department of Internal Affairs is notified of all breaches by Excluded customers and has the ability to take prosecution action if deemed necessary.

The Grand Casino Host Responsibility team regularly reviews the Exclusion process and when necessary, makes improvements. The reviews may involve seeking customer and staff feedback through informal research processes.

Loyalty Card Holders

Grand Casino must remove from the Loyalty programme all Excluded and Trespassed customers.

The Grand Casino Surveillance staff members are responsible for the administration of the Exclusion and Trespass records or the Authorised staff member undertaking the particular Exclusion must ensure that:

- Host Responsibility Team are advised within 24 hours of a Loyalty programme card holder being excluded or trespassed, to ensure the account is deactivated.
- Forward any surrendered Loyalty card(s) to the loyalty desk.

The Authorised person administering of the Exclusion or Trespass must:

- Deactivate Excluded cardholders' accounts.
- Deactivate the accounts of cardholders who have been trespassed.
- Deactivate from mailing lists, cardholders who are excluded or trespassed.

Loyalty cards which are deactivated are not required to be returned by the customer to Grand Casino. Should a customer attempt to use his/her deactivated card, it will be recorded into the Bally computer system and the customer will not accrue any Grand Reward points. This will assist the Casino to confirm the fact that they were on site. Having confirmed that the customer has been excluded or trespassed, the Security/Surveillance Shift Manager will take appropriate action in relation to that customer.

2.1.2 Responsible Service of Alcohol

Background

The Grand Casino Responsible Service of Alcohol Programme is designed to ensure customers enjoy an environment that is safe and enjoyable. A key component is the Grand Casino Responsible Service of Alcohol training programme, which is designed for all frontline staff, to promote effective teamwork to ensure customer safety and enjoyment.

Grand Casino's Responsible Service of Alcohol Programme will reflect the following principles, which are derived from the Health Promotion Agency's "Creating a Responsible Drinking Environment - Host Responsibility: Guidelines for Licensed Premises 2018".

A responsible host:

- Prevents intoxication.
- Does not serve alcohol to minors.
- Provides and actively promotes non-alcoholic alternatives.
- Provides and actively promotes substantial food.
- Serves alcohol responsibly or not at all; and
- Promotes safe transport options.

Approach

The following is Grand Casino's Programme regarding the Responsible Service of Alcohol:

- Grand Casino provides the sale of alcoholic beverages in a responsible manner, including monitoring and limiting the supply of alcohol to customers.
- Grand Casino will ensure that it observes the provisions of the Sale and Supply of Alcohol Act 2012 (the "Alcohol Act") relating to the permitted hours within which customers can be sold and supplied alcohol and customers and staff are permitted on licensed premises.
- Grand Casino maintains an effective Responsible Service of Alcohol training programme to train and inform all frontline staff on the responsible sale and supply of alcohol.
- All Grand Casino frontline staff undergo training on the Responsible Service of Alcohol during their induction. This includes the recognition of excessive alcohol consumption traits. This is also addressed as part of the HR1 Level training. Within three months of commencing employment at Grand Casino these staff are required to attend a more formal training session on responsible service of alcohol.
- Grand Casino takes all reasonable steps to ensure intoxicated persons are prevented from entering the premises.
- Grand Casino takes all reasonable steps to ensure that customers are not served to the point of intoxication. Any customer displaying signs of intoxication will be removed from the premises.
- Any customer who appears under the age of 25 may be asked for verification of identity and proof of age, before being served or sold alcoholic beverages. If such identification cannot be produced, the customer is not served or supplied with any alcohol.
- Staff tactfully intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of staff of similar social/ethnic background to the customers to assist in explaining the programme to customers when required.
- No person who appears intoxicated is served or sold alcohol, allowed to gamble, or allowed to remain on the premises. The decision by any employee to withhold service cannot be revoked or overruled by another, without referral to a more senior employee.
- At all times, when alcohol is sold or supplied to members of the public, there is a manager or managers on duty who hold current a Managers Certificates under the Sale and Supply of Alcohol Act 2012.
- No complimentary alcoholic drinks will be supplied to customers participating in gaming without the knowledge of the Acting Area Manager and above. This is not intended to prohibit normal complimentary Food and Beverage Service for customers and does not require a customer to

- participate in gaming activity as a condition of service.
- Any customers invited to functions/events being hosted by Grand Casino must agree to abide by the Grand Casino Responsible Service of Alcohol Programme and procedures regarding Responsible Service of Alcohol.
 - Customers may not bring alcoholic beverages onto the premises where beverage service is provided unless prior approval has been given.
 - Grand Casino will ensure that a reasonable range of non-alcoholic drinks is available at reasonable prices.
 - Grand Casino will ensure that a reasonable range of low-alcoholic drink is available
 - Grand Casino will ensure that a reasonable range of food is available at all times in portions suitable for a single customer, at reasonable prices, and within a reasonable time of being ordered.
 - Grand Casino will readily provide free, comprehensive, and accurate information to customers about the forms of transport available from the premises; and
 - Free water will always be available to customers.

2.1.3 Unattended children

Background

Grand Casino management does not allow children to be left unattended on any part of its premises, or surrounding environs.

Approach

Grand Casino takes active steps to prevent children being without adult supervision.

Employees must report to Security any incident where it is apparent that a child has been left unattended.

Security Officers or an Authorised Person must intervene and undertake their best endeavours to locate an adult responsible for an unattended child.

Security Managers or an Authorised Person must contact the Police and trespass and/or exclude the customer in every case where there is an absence of a reasonable explanation for the child being left unattended. Under the age of 14.

In all instances of unattended children, the Host Responsibility team must be notified to follow up potential problem gambling issues.

Security Officers must patrol the car park shared by the Grand Casino and the Scenic Hotel Southern Cross, and surrounding environs, to detect any unattended children.

Grand Casino will actively investigate and take appropriate action whenever children are found unattended at the Scenic Hotel Southern Cross.

2.1.4 Underage persons

Background

Grand Casino is committed to keeping minors out of the casino. Grand Casino will rigorously enforce the prevention of under-age gambling in its Casino.

Approach

Grand Casino must take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gambling facilities (currently 20 and over).

Any customer who appears under the age of 25 may be asked for verification of identity and proof of age before being permitted to enter the Casino.

Training for Grand Casino Frontline staff must include the need to be particularly vigilant for the presence of under-age persons.

Any Grand Casino staff member has the authority to approach suspected under-age persons and seek identification for proof of age.

2.1.5 Standards of dress and behaviour

Background

Grand Casino must provide a comfortable environment where customers are able to enjoy their surroundings without disruption from others who are inappropriately dressed or behave in an unacceptable manner.

Dress Code

Grand Casino requires a neat and tidy standard of dress.

While it is difficult to be prescriptive about dress suitability, in normal circumstances the following are not permitted at Grand Casino:

- Torn clothes (except for fashion wear).
- Gang patches or other insignias.
- Offensive logos.
- Dirty clothes or footwear; or
- Hats, caps, or sunglasses (unless for religious or medical reasons or those participating in Texas Hold'em poker).

Behavioural Standards

If a customer is detected:

- Under the influence of alcohol.
- Abusing or threatening staff or other customers.
- Causing conflict with other customers or staff.
- With hygiene issues, or
- Otherwise being unpleasant,

Then Grand Casino staff must:

- Take appropriate steps to stop the behaviour; or
- In appropriate circumstances, have the customer escorted from the premises.

Customers exhibiting undesirable behaviour may be trespassed, excluded, or denied entry.

2.1.6 Long Hours of Play

Continuous Presence

Continuous Presence is where a customer is present at the casino (but not necessarily gaming continuously) for a period of 12 hours or more. The clock is reset after a customer has had a break from being present at the casino for six hours or more.

As a general rule:

- When a customer has been observed to be continuously present at the casino (but not necessarily gaming continuously) for 12 hours, the observing staff member will notify an Authorised Persons. Best endeavours must then be made to interact promptly with the customer.
- In the course of the interaction, the customer will be required to leave the premises immediately. Subsequent interactions or interventions with that customer may be required in the future.
- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.

If one or more of the strong indicators is observed, one of the Authorised Persons must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been present.

All interactions, observations and assessments must be logged in iTrak.

iTrak is Grand Casino's computerised Incident Reporting and Risk Management System.

Continuous Play

Continuous Play is where a customer is gaming continuously for five hours or more. The clock is reset after a customer has had a break from gaming of at least 30 minutes (in aggregate).

As a general rule:

- When a customer has been observed to be continuously gambling for five hours without a break of at least 30 minutes (in aggregate), the observing staff member will notify an Authorised Person. Best endeavours must then be made to interact promptly with the customer.
- In the course of the interaction, the customer will be required to take breaks and Gaming Staff and/or an Authorised Person must thereafter continue to monitor the customer (which may include subsequent interactions with that customer).
- If any interaction gives rise to immediate concern that the customer is a problem gambler, Host Responsibility must proceed as required by the Act, the Policy and this Programme.
- When a customer has been gaming continuously for 10 hours (without an uninterrupted break of at least 60 minutes) and, provided that no action has already been taken under the Act, this Programme or the Policy, an Authorised Person will request the customer to leave the premises for at least 24 hours.
- If one or more of the strong indicators is observed, an Authorised Person must intervene immediately and proceed as required by the Act, this Programme and the Policy irrespective of how long the customer has been on site.

All interactions, observations and assessments must be logged in iTrak.

Uncarded players

Although ascertaining the length of "continuous presence" and "continuous play" for uncarded players relies upon observation rather than a system record, if staff become aware of uncarded players being "continuously present" or undertaking "continuous play" for the periods set out above, they must report their observation so that those uncarded players are treated as set out above.

2.1.7 Gambling limitation

Pre-Commitment

Grand Casino offers customers a voluntary Pre-Commitment system which allows customers to voluntarily set limits on how much they spend and how long they play for on gaming machines. Customers receive an automated warning message when they reach 50% of their set limit with a further notification with 90% is reached. Should the customer reach their limit they are no longer awarded bonus points or entries into promotions.

Should the pre-commitment limit be reached an automated message is sent to gaming staff who will intervene with the customer if they are still on site.

If it is established that a patron has reached their pre-commitment level and they have continued to gamble with or without their card in the machine, the player will be required to leave the casino immediately and stand down for a minimum of 24 hours.

Breaches of pre-commitment limits, and multiple increases or disabling of pre-commitment limits are general indicators of potential problem gambling. An authorised person will proactively encourage the use of this system, where appropriate, during interactions with patrons.

The features of the voluntary Pre-Commitment system include:

- Access to the Pre-Commitment facility via Grand Casino's loyalty card.
- Each time the loyalty card is inserted, the Pre-Commitment facility will be activated.

The system will allow players to define their own limits for:

- Time limit; and
- Spend limit.

Enrolment for pre-commitment can occur at either:

- The gaming machine by the player; or
- A loyalty member's workstation.
- An 'approaching limits' and 'reached limits' notification will be displayed on the gaming machine.
- If limits are shortened; the effect will be immediate.
- Once the limit is reached, no more loyalty points may be accumulated or entries to promotions earned and the player will be asked to finish up their gambling and leave.
- Host Responsibility must be alerted once limits are breached, increased, or disabled.
- No loyalty points can be earned by a player for the 24 hours following a limit being reached; and
- The system will provide information, support, and advice to the operational business units.

2.1.8 Cashless Gambling

Grand Casino provides for cashless EGM (Electronic Gaming Machine) play. This play may be facilitated by a Secure Electronic Transfer (SET) for loyalty programme members (carded play) and Ticket based transactions e.g., TITO (Ticket In Ticket Out). Cashless play has the following transaction limits as set out in the gazette Minimum Cashless Technical Requirements for printed Ticket-In Ticket-Out and Player Loyalty Account-Based Cashless Gambling Technology.

General Limits:

A kiosk can, for equivalent cash in any one transaction:

- Issue single or multiple tickets up to a combined ticket value of \$500.
- Cash out in cash with no greater than a \$20 denomination, a single ticket up to a maximum of \$500.

A gaming machine, electronic table game or table game redemption device can for equivalent cash in any one transaction:

- Either by ticket acceptance or accept cash equivalent credits for play up to a maximum of \$5,999.
- Print or issue a single ticket up to a maximum of \$5,000 with credit balances greater than \$5,999 requiring a hand pay.

Limits in Restricted Areas:

A kiosk can, for equivalent cash in any one transaction:

- Issue a single or multiple ticket up to a maximum combined ticket.
- Value of \$500.
- Cash out \$500 in any denomination

A gaming machine, electronic table game or table game redemption device can for equivalent cash in any one transaction:

- By ticket acceptance accept cash equivalent credits for play.
- Up to a maximum of \$5,999.
- Print or issue a single ticket up to a maximum of \$5,999 with credit balances greater than \$5,999 requiring a hand pay

Grand Casino has a range of measures to minimise any potential harm from the use of cashless gambling:

- Enhanced staff awareness of the risks associated with cashless gambling.
- Provide the following details to the Gambling Commission as part of its annual HRP reporting:
 - The number of patrons identified as potential problem gamblers.

2.2 Host Responsibility information for customers

Customer Information Resources

Grand Casino produces a range of host responsibility information resources for customers. Copies of all Grand Casino brochures and other host responsibility information are available and displayed where appropriate in Grand Casino's Gambling Area.

This information is also supplemented and supported by the Grand Casino website (www.GrandCasino.co.nz) where electronic copies of the resources are made available. A copy of this Host Responsibility Programme is displayed on the Grand Casino website.

There is an ongoing process of review and development of resources for customers.

Information resources are translated into a variety of languages consistent with the cultural make-up of Grand Casino's customer base.

A summary of Grand Casino's host responsibility resources for customers is shown in Appendix A. Grand Casino currently has five tiers of card members. Anyone being promoted to the Invite only tier (Elite) will be spoken to, to assess signs for harmful gambling before a decision is made to promote them. Anyone being promoted to the top tier (Prestige), will have every endeavour taken to speak and assess for signs of harmful gambling.

A monthly Host Responsibility meeting will be held to discuss gambling harm.

2.3 Employee gambling-related harm

Introduction

Grand Casino is committed to developing an internal culture that proactively supports and promotes host responsibility.

Background

Grand Casino undertakes a range of measures concerning the potential for employee gambling related harm that aim to:

- Prevent and minimise gambling-related harm amongst Grand Casino employees as a result of their own, or someone else's, gambling.
- Enhance the ability of Grand Casino staff to undertake effective host responsibility; and
- Contribute to the prevention and minimisation of gambling-related harm in the community.

These measures are intended to address the operator licence condition:

'24(f) assistance to Casino employees with managing the potential for personal problem gambling'.

Requirements

Grand Casino recognises that employee gambling related harm is a sensitive issue. Accordingly, measures to promote awareness, encourage and support help-seeking will be discreet and interventions with Grand Casino staff kept confidential.

Grand Casino will undertake the following to provide assistance to Casino employees with managing the potential for personal problem gambling:

Information resources

- Develop supporting resources for staff that will be made available when required through appropriate channels. They will include:
 - Information in the Grand Casino handbook for seeking help.
 - Self-help resources to assist with early self-identification and
 - Intervention.
- Include information about personal problem gambling and underlying risk factors (such as depression, debt, and alcoholism) in host responsibility training programmes and in the EAP Services (Employee Assistance Programme).
- Promote awareness about self-assessment and self-help resources and encourage staff to use these resources themselves to assist with early identification and intervention.

Policies and procedures

- Prohibit staff from gambling at Grand Casino.
- Prohibit access to online gambling sites by staff while at Grand Casino unless such access is required for genuine business reasons.
- Identify high risk areas for staff and target with increased levels of information.

Recruitment

- Assess all job applicants for evidence of problem gambling (via questions in job application forms).
- Decline applications from those who are identified as problem gamblers either through their screening results, or disclosure of relevant indicators (as set out in the Grand Casino Employment Application Form) during the recruitment process and provide appropriate information, advice and assistance.
- Respond to applicants identified as problem gamblers who are also customers in accordance with the Grand Casino Host Responsibility Programme.

Support for staff

- Provide assistance to staff who are experiencing gambling-related harm including:
 - Identification.
 - Intervention.
 - Referral to confidential support through the EAP Services Programme and/or a problem gambling treatment provider.
 - Confidentiality; and
 - Wherever possible Grand Casino will involve problem gambling counsellors in staff induction training about the signs of problem gambling among staff and customers.

Engagement

Engage with Class 4 organisations to maximise the effectiveness of our Host Responsibility Programme.

2.4 Stakeholder engagement

Background

Grand Casino aims to maintain constructive relationships with members of the local community.

Approach

Grand Casino will continue to facilitate opportunities for regular engagement to ensure local stakeholders:

- Understand and are aware of Grand Casino's Host Responsibility Programme.
- Are able to continue to raise and discuss operational issues in relation to host responsibility.
- Continue to have opportunities to provide input into Grand Casino's Host Responsibility Programme and harm prevention and minimisation initiatives.
- Have opportunities to participate in partnership projects on key initiatives where appropriate.

Grand Casino convenes a quarterly problem gambling liaison meeting to discuss host responsibility issues. These issues relate primarily to operational issues, for example, referrals and exclusions, etc. These are also opportunities to discuss broader sector initiatives.

Grand Casino will invite representatives from:

- treatment service providers including the Problem Gambling Foundation and Asian Family Services
- public health providers.
- University of Otago; and
- Government agencies, including DIA, Police and the Dunedin City Council.

Grand Casino will keep membership of these meetings under review to maintain relevance to Grand Casino's current or evolving policies and practices.

In developing and implementing its Programme, and harm prevention and minimisation initiatives, Grand Casino will consider the views expressed by the attendees of the liaison meeting.

Grand Casino will engage with Class 4 organisations to maximise the effectiveness of Host Responsibility Programmes across both the casino and class 4 sectors.

Grand Casino will make available to the liaison group, a copy of the report provided to the Commission under Section 3 of this programme

Grand Casino also conducts other engagement activities on a periodic basis, for example, hosting site visits from problem gambling service providers.

2.5 Environmental design

Approach

Grand Casino's general approach towards environmental design is to ensure the provision of safe environments that are conducive to responsible gambling and consumption of alcohol.

Considerations

In considering the impact of any proposed changes, the key objectives are to ensure that environmental features:

- Contribute to harm prevention or have a neutral impact on harm.
- Encourage responsible gambling and alcohol consumption choices.
- Do not contribute to the onset of harm or exacerbate risk; and
- Facilitate effective host responsibility, particularly early identification, and intervention.

This approach applies to the following Grand Casino areas:

- Floor lay-out, furnishing and design.
- Casino electronic gaming machine and table game location.
- Access to cash.
- Game and equipment features.
- Environments adjacent to the Gambling Area, including access to other entertainment options.
- Physical location and presence of Security and Host Responsibility staff.
- Location of problem gambling and other information resources; Access criteria, including dress codes and age restrictions.

Requirements

Grand Casino shall in its environmental design seek to ensure:

- Problem/responsible gambling signage and exit points are clearly visible.
- Patrons are visible to venue staff in the Gambling Area.
- Machine alleys with no exit point and in dimly lit corners are avoided.
- Gambling area is well lit, utilising natural light where appropriate.
- Clocks are visible in the Gambling Area; and
- Other non-gambling entertainment options are available.

Other regulatory processes

All applications for construction or design changes to Gambling Area must be approved by the Gambling Commission. As part of any such application Grand Casino assesses any impacts the alterations may have on harm prevention and harm minimisation. The impact of any proposed design change on gambling harm is assessed in determining the suitability of any such proposal prior to making applications to the Commission.

2.6 Safe gambling environment - Gaming machine play

Requirements

Grand Casino will undertake reasonable and practicable steps to ensure a customer plays no more than one gaming machine at a time.

2.6.1 Safe gambling environment - third party loans for financial gain

Legislation

Under section 15(1) of the Act, Grand Casino is prohibited from offering or providing credit intended for use in gambling, except in circumstances approved by the former Casino Control Authority (CCA) or the Gambling Commission. The Gambling Commission regulates and approves, as necessary, all cash access arrangements provided at Grand Casino.

Policy

Grand Casino does not permit loan transactions by third parties for financial gain at the Casino, except as approved by the CCA or the Gambling Commission. It is particularly concerned to protect customers from illegal or oppressive loan activity, or "loan sharking" as it is known.

Requirements

- Grand Casino will ensure that signage is displayed in appropriate areas publicising that loan sharks will be excluded.
- Grand Casino will take all reasonable steps to identify and exclude persons at the Casino offering loans for financial gain. To assist this process Grand Casino will maintain a Standard of Dress and Behaviour SOP which shall explain how Grand Casino will identify, investigate, and respond to persons at the Casino suspected of offering loans for financial gain.
- Where Casino staff observe suspicious behaviour or information is presented from external parties regarding loan activity, Grand Casino will investigate and act in a timely manner. This process is outlined in the Grand Casino Standards of Dress and Behaviour SOP.
- If it is obvious that a person is engaged in offering or providing loans for financial gain, Grand Casino will issue that person with a trespass notice. If there is reasonable cause to believe that a person is engaged in offering or providing loans for financial gain, Grand Casino may request the customer to leave the premises, pending further investigation. At the completion of its investigation, and where a person is found to be offering loans for financial gain, Grand Casino will issue that person with a trespass notice.
- Grand Casino will notify the Department of Internal Affairs Gambling Inspectors in accordance with MOS (Minimum Operating Standards) for Records and Notification. Where appropriate, Grand Casino also notifies relevant agencies.
- Where a customer is established as receiving a loan for financial gain from a third party (i.e. not the Casino), Grand Casino will open a GOI file to investigate further. A customer borrowing money in these circumstances is considered a potential problem gambler and will be provided with appropriate information, advice and assistance including information on exclusion.
- Depending on the outcome of the GOI investigation, the customer may be issued with a Grand Casino Identified Exclusion depending on whether the customer is identified as a problem gambler and unable to continue gambling without experiencing further harm. Grand Casino will provide appropriate staff training to assist in preventing and minimising harm associated with loan sharking.

NOTE:

Gambler of Interest (GOI) is a person who for whatever reason, the casino has decided to monitor their play on a more formal basis. This would include someone who has recently been granted re-entry after an exclusion to the casino or someone whom the casino believes it is prudent to watch their play to assess and minimise harm.

Standard Operating Procedures (SOP) is a set of written instructions that describes the step-by-step process that must be taken to properly perform a routine activity. SOPs should be followed the exact same way every time to guarantee that the organisation remains consistent and in compliance with industry regulations and business standards.

2.6.2 Safe gambling environment - Cheque retention

Policy

Grand Casino does not accept cheques.

2.7 Responsible Marketing

Legislation, industry codes

Grand Casino's marketing activities comply with applicable laws; Regulations 9 and 10 of the Gambling (Harm Prevention and Minimisation) Regulations 2004; relevant industry codes including the New Zealand Advertising Standards Authority "Gambling Advertising Code 2019"; and licence conditions.

Requirements

Grand Casino will not pursue marketing initiatives which have any of the characteristics set out below. Where concerns are raised by third parties, Grand Casino will investigate and, where appropriate, take immediate action to withdraw or amend the marketing initiative.

Grand Casino will ensure an internal process is followed to ensure harm minimisation issues are considered and addressed in the development of marketing initiatives, including those directed to members of Grand Casino's loyalty programme.

This process includes consultation with Compliance as well as the Chief Executive Officer. Consultation includes consideration of the following principles.

Does the marketing initiative:

- Target groups at increased risk of experiencing gambling harm?
- Target minors, portray minors participating in gambling activities, or advertise gambling on radio/television at times when minors are more likely to be exposed?
- Encourage or reinforce gambling behaviour(s) that may be associated with harm, including:
 - Encourage customers to participate beyond their limits of time or money?
 - Discourage customers from taking breaks?
 - Promote gambling as a means of relieving financial or personal difficulties?
 - State or imply that gambling is a means of winning or paying for household staples, education, or housing commitments?
 - Promote excessive alcohol consumption or associate gambling with excessive alcohol consumption?
 - Present gambling in an unrealistic, misleading, or deceptive way, including: exaggerating the chances of winning or the size of the prize, including a promise of winning?
 - Stating or implying that a player's skill can influence the outcome of a game unless the skill can affect the outcome of the game?
 - Exploiting superstitions or concepts of luck?

2.8 Display of signage and provision of gambling information to customers

Background

A key component of the Programme is the provision of information for customers. Provision of information is intended to assist customers to make informed decisions about their gambling and alcohol consumption while at Grand Casino.

A description of how Grand Casino will discharge its obligations to offer information and advice to persons identified as problem gamblers is addressed in the Problem Gambler Identification Policy and the SOPs.

Approach

Grand Casino has a range of information resources that are provided to customers, summarised in Appendix A.

Display of signs, brochures, clocks, website

Grand Casino ensures that:

- Host responsibility material is displayed prominently and translated into key languages, besides English, to reflect the ethnicity of Grand Casino visitors.
- Brochures are maintained in sufficient quantities so as to be generally available at all times, at all locations.
- All gaming machines and gaming tables at Grand Casino display problem gambling helpline telephone numbers. The public telephone in the Gambling Area and the phone at the front entrance foyer will also have gambling helpline numbers, as will the ATM at the entry to the Casino. Grand Casino has many brochures around the Casino in a variety of languages.
- Clocks are on display in the Grand Casino Gambling Area.

Grand Casino will make available an 'Odds of winning' brochure, intended to assist in reducing the tendency of patrons to be subject to erroneous beliefs, e.g. that the odds of winning are better than they are, that skill can influence outcomes (where it cannot), or player tendencies to engage in various superstitious practices.

Grand Casino actively promotes the Gambling Helpline and other free problem gambling counselling service contact details through its host responsibility resources. Customers demonstrating potentially harmful behaviour are encouraged to contact these services. All Excluded customers, and third parties who contact Grand Casino about another's gambling problems, are actively encouraged to contact the appropriate services for help and support.

Grand Casino has a host responsibility section on its website.

Display of game rules, permissible bets, payment of winning bets for Table Games

Information is made available to customers that pertain to game rules, permissible bets, and payment of winning bets as required by section 175 of the Gambling Act.

Whenever a table is open, information is displayed which advises customers that the game rules for the game are available upon request, and specifies minimum and maximum bets, and payments of winning bets. Signage is also displayed that staff are unable to accept tips.

Display of game rules, permissible bets, payment of winning bets for Electronic Gaming Machines

All gaming machines display information regarding the denomination of the game. Game rules are provided on the machine and/or electronically via the screen. Gaming machine odds are explained in the 'Odds of Winning' brochure, which is available in the Gambling Area.

Customers may request a copy of game rules at any time. If the request is for general information or an

overview of a game, the Gaming Manager or Area Manager will explain this and can provide a "How to Play" brochures that are available to assist patrons.

Display of game rules, odds of winning and information of problem gambling for Fun Play Tables

Information is made available to customers that pertains to game rules, odds of winning and information on problem gambling.

Whenever a Fun Play table is open, information is displayed which advises customers that the game rules for the game are available upon request, and odds of winning and information on problem gambling.

Display of Host Responsibility information in open areas where there are gaming machines

Information on problem gambling and responsible gambling is displayed at the point of entry and throughout the Casino on the gambling floor.

Information requests by customers

Customers wishing to seek further clarification of game rules will on request be shown in written form the rule that is applicable.

Information on Gambling Activity

Loyalty card players will be provided, on request, with information on their gambling activity, including the number and length of their gambling sessions and their gambling expenditure.

Where possible non/carded players will also be supplied with as much information as available on their gambling activity.

29 Learning and development

Introduction

Grand Casino is committed to developing staff awareness, understanding and commitment to host responsibility, especially regarding gambling and alcohol-related harm. Grand Casino shall comply with its statutory obligations relating to problem gambling awareness training, including as set out in Regulation 12 of the Gambling (Harm Prevention and Minimisation) Regulations 2004.

Grand Casino will aim to ensure its learning and development initiatives are appropriate to the needs of its customers and staff.

Grand Casino's learning and development resources approach employs established models of best-practice and includes a training mix of classroom based, and on-the-job coaching. Learning and development resources are tailored depending on the roles and responsibilities of staff, and their required host responsibility customer interactions.

Overview of Staff Roles

Staff:

All staff, regardless of their position at the Casino, are trained to identify indicators of harm. Staff are expected to refer the observation of indicators to a supervisor/manager.

All staff are required to be trained in problem gambling awareness and how to approach customers to offer information and assistance about problem gambling. Staff have a primary role in being alert to and identifying indicators of harm and will report observations of concern to a supervisor/manager. While it is not their primary role, frontline staff are trained and will approach customers themselves in circumstances, for example, where a matter is urgent, or a manager/supervisor/Authorised Person is not available.

Supervisor/Manager:

The supervisor/manager is the first point of contact for escalation for indicators of harm.

Supervisors/managers are responsible for ensuring that all observations of indicators reported to them, and any follow-up responses taken, are sent to the Managers Host Responsibility group. Supervisors/Managers are also responsible for providing additional information to an Authorised Person to assist with the ongoing monitoring of, and interaction with, the customer.

The supervisor/manager can also approach customers where the matter is urgent, and an Authorised Person is not available.

Authorised Persons:

Authorised Persons are responsible for undertaking interventions.

An Authorised Person has been trained in HR Levels 1 and 2. They are responsible for approaching customers and undertaking interactions, interventions, and exclusions. In an emergency a suitably trained HR2 trained person may undertake the above roles.

Authorised Persons are also responsible for ensuring that all observations of indicators reported to them, and any follow-up responses, are logged and sent to the Managers Host Responsibility group. Authorised Persons also record interactions and interventions they undertake themselves.

Authorised Persons are also responsible for providing additional information to Host Responsibility to assist with the ongoing monitoring of, and interaction with, the customer.

Host Responsibility: Host Responsibility records, collates, and analyses all information relating to indicators of problem gambling noted by frontline staff, supervisors/managers, and Authorised Persons. It also records interactions and interventions they undertake themselves. The information is used to undertake an assessment of risk and harm. As a result of the assessment, a GOI file may be opened, and/or appropriate follow up interactions or interventions undertaken. This may include meetings with customers. Host Responsibility is responsible for the ongoing monitoring and management of GOI files, feedback, and review of new information on GOI files and the provision of host responsibility advice and support to staff.

Learning and Development Requirements

Induction Training (HRI Level)

All employees must participate in classroom-based training within a reasonable timeframe of commencement (within three months). Grand Casino will be introducing e-learning from March 2024. Staff will be required to undertake this learning within a month of commencing their employment.

This training includes but not limited to:

- Responsible service of gambling and alcohol.
- Identification of problem gamblers.
- Reporting and recording procedures for observations.
- What is Pre-commitment and how it works?
- Approaching and providing information about problem gambling to players when an authorised person is not available, or the matter is urgent.
- Awareness of employee gambling-related harm.

Grand Casino will work to supplement this training by ensuring that these staff also complete a written test. There will also be refresher training as noted below.

Training for staff will be further supplemented by on-the-job coaching and support.

HR2 Training (HR2 Level)

All front-line staff and any other staff where it is believed it will be beneficial will participate in supplementary Level 2 training. This training is to be undertaken within 6 months of commencement or promotion to a supervisor position. The training includes information on:

Identification of problem gamblers:

- Initial action with respect to customers requesting problem gambling assistance; and
- Identification and intervention with respect to excessive alcohol consumption.
- Support of staff who have intervened and debrief.
- Importance of reporting.
- This training is done in conjunction with a representative from a treatment service provider.
- Grand Casino's legal and regulatory requirements.
- Identification of problem gamblers.
- What is Pre-commitment and how it works?
- Intervention including brief interventions, de-escalation, and motivational interviewing.
- Debriefing and staff support.
- Problem gambling treatment processes.
- Cultural awareness.
- Advanced Responsible Service of Alcohol - intervention and slowing service.
- Awareness of employee gambling-related harm.
- Suicide awareness
- Exclusions
- Interactions
- Interventions

Refresher Training

Grand Casino will provide refresher training on an annual basis, and it will be available to all staff at Grand Casino. It will be delivered in a group situation.

Manager's Certificate - Sale and Supply of Liquor Act 2012

The Licence Controller Qualification, as required by the Sale and Supply of Liquor Act 2012, is facilitated through an external provider.

Suicide Awareness Training

Authorised Persons are trained to respond to customers who are at risk of suicide. This training may be facilitated by an external provider.

Informal learning and development

As learning and development is an ongoing process, Grand Casino provides a range of other opportunities for host responsibility learning to occur. There is an emphasis on sharing information and experiences across Grand Casino's portfolio to build host responsibility knowledge. These internal opportunities include:

- Internal communications e.g., staff newsletters.
- Inclusion in business or management processes e.g., staff meetings and key performance indicators.

Evaluation

Grand Casino undertakes a range of evaluation measures as part of its commitment to learning and development quality improvement. These measures include:

- Staff training feedback and evaluation forms.
- Staff knowledge recall and application of knowledge.
- Analysis of training needs.

2.10 Identification of problem gamblers

A copy of Grand Casino's Problem Gambler Identification Policy is attached as Appendix Band forms part of this Programme. The policy fulfils Grand Casino's obligations under the following sections of the Act.

Section 308 requires the holder of a Casino operator's licence, or person acting on behalf of that person, must have a policy for identifying problem gamblers, which includes:

- An acceptable definition of problem gambling.
- Indicators of problem gambling in the Casino.
- The steps to be taken in identifying actual or potential problem gamblers.

This policy must be made available upon request. It is also available from the Grand Casino's website. Grand Casino must take all reasonable steps to use the policy to identify actual or potential problem gamblers.

Section 309 requires the holder of a Casino operator's licence, or person acting on behalf of that person, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) the Self-Exclusion procedure available; and
- (b) any procedures described by Regulations made under the Act.

If a customer is approached and provided with the above information and advice on problem gambling but does not request self-exclusion, section 309A of the Act requires the holder of a casino operators license, or a person acting on its behalf, must take all reasonable steps to assist that person (including, if appropriate) issuing an exclusion order, if the persons ongoing gambling or other behaviour gives reasonable cause to believe that he or she is a problem gambler.

3.0 Monitoring and reporting

Introduction

Grand Casino will evaluate its performance against the objectives of the Programme.

The Grand Casino's Host Responsibility Programme is measured and monitored using a range of indicators that are set out below. These indicators reflect the level of activity under the Programme, compliance with legal obligations, and progress against all the Programme objectives as set out in section 1.

As the Programme is implemented and embedded into the business, and any initiatives are developed, Grand Casino may seek to amend this section of the Programme, prior to the Commission's next three-yearly review.

Reports to the Gambling Commission

Grand Casino will report annually to the Commission on the implementation of the Programme.

Reports will include the following information:

- A description of the resources put into the core elements of the Programme.
- A description of activities undertaken by Grand Casino under the Programme.
- Reporting against the measures specified below, including a comparison to previous data where applicable. For its first report, Grand Casino will agree with the Commission on the data available to be presented (given that some of the measures specified below will require Grand Casino to collect new information).
- Grand Casino's discussion on the effectiveness of the Programme and the extent to which Programme objectives in section 1 are being achieved. This will include reference to feedback from internal and external stakeholders received through a range of forums such as regular meetings with the DIA and other meetings held as required.
- Proposed improvements to the Programme.

| Gambling Related Measures | Source of data | Frequency |
|---|-----------------------|------------------|
| Number of customers about whom there have been observations. | Grand Casino | Annual |
| Number of indicators reported to Host Responsibility. | Grand Casino | Annual |
| Number of approaches to Grand Casino by third parties. | Grand Casino | Annual |
| Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of Problem gamblers identified by the Casino. | Grand Casino | Annual |
| Number of GOI files by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age • Preferred mode of gambling (tables/EGMs) | Grand Casino | Annual |
| Number of interventions conducted with customers. | Grand Casino | Annual |
| Number of approaches to customers to offer information about self-exclusion. | Grand Casino | Annual |
| Number of Exclusions by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age • Preferred mode of gambling • Prompted by third party disclosures • Exclusion type (self/Grand Casino) • Timeframe • Following re-entry | Grand Casino | Annual |
| Number of exclusions by length: <ul style="list-style-type: none"> • 3 months • 6 months • 9 months • 12 months • 24 months | Grand Casino | Annual |
| Number of customers participating in multi venue Exclusions. | Grand Casino | Annual |
| Number of customers participating in multi casino Exclusions. | Grand Casino | Annual |
| Number of customers participating in Pre-Commitment programme. | Grand Casino | Annual |
| Number of Excluded customers agreeing to be contacted by help services on exclusion form. | Grand Casino | Annual |
| Number of breaches of Exclusion by: <ul style="list-style-type: none"> • Ethnicity • Gender • Age | Grand Casino | Annual |
| Number of successful and unsuccessful applications to re-enter following exclusion. | Grand Casino | Annual |
| Number of persons trespassed or required to leave for making loans for financial gain | Grand Casino | Annual |
| Measures relating to Responsible Consumption of Alcohol | | |
| Number of "Under the Influence" (UTI) incidents (internal report). | Grand Casino | Annual |
| Number of requests for people to leave due to the amount of alcohol consumed. | Grand Casino | Annual |
| Measures relating to Staff Training | | |
| <ul style="list-style-type: none"> • HRI courses • HR2 courses | Grand Casino | Annual |

| | | |
|---|--------------|--------|
| <ul style="list-style-type: none"> • Refresher training • Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level of training. | | |
| Staff recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures. | Grand Casino | Annual |
| Staff Perceptions on the effectiveness of the Employee Gambling Harm Programme. | Grand Casino | Annual |
| Results of tests conducted by staff relating to host responsibility and associated policies and procedures. | Grand Casino | Annual |
| Staff perceptions training of the effectiveness of training | Grand Casino | Annual |
| Other Programme activity and compliance- related measures | | |
| Number of internal and external underage incidents | Grand Casino | Annual |
| Number of unattended children | Grand Casino | Annual |
| Number of unaccompanied children where the caregiver is gambling | Grand Casino | Annual |
| Number of supervised children | Grand Casino | Annual |
| Number of supervised children in our surrounds where the caregiver is gambling | Grand Casino | Annual |
| Number of people trespassed or requested to leave the Casino for other reasons | Grand Casino | Annual |

Appendix A- Current Host Responsibility Resources for Customers

(as of February 2024)

"Responsible gambling"- brochure

This brochure provides responsible gambling tips and an overview of the odds of winning, and player returns. It also details responsible service of alcohol, age restrictions, advertising, and promotions as well as the various local gambling providers.

"Odds of winning" - brochure

This brochure provides an overview of the House Advantage for all table games and machines at Grand Casino. It details players expected loss on each of these games. It also gives details on Understanding the House Advantage and Superstitions and Beliefs.

"Exclusion Options"" - brochure

The brochure outlines the exclusion process at Grand Casino. It details both self-identified and casino identified exclusions, re-entry criteria and other useful information including privacy, how to obtain additional information and the fact that counselling services are available free of charge.

"Responsible Service of Alcohol Policy" - notice

This notice is prominently located in the bar area and outlines the Grand Casino's Responsible Service of Alcohol Policy for customers. This includes items such as our age restrictions, the fact no one will be served if intoxicated, provision of food and alternative transport options. Additional plaques are throughout the casino advising that liquor will not be sold to intoxicated patrons.

"Gambling Hotline" - signs

Three framed signs in Chinese and Korean, outlining the fact help is available through the gambling helpline, are located in the Casino, two of which are in the customer restrooms.

"Asian Family Gambling Services" - brochure

Various brochures in Korean and Chinese are available for those unable to read or understand the English brochures. There is also a separate brochure which is available in Maori.

"Policy for Identifying Problem Gamblers" - notice

Two framed notices are on the gaming floor outlining Grand Casino's commitment to best practice in the provision of responsible gambling.

"Brochures from Gambling Providers" - brochures

Grand Casino has brochures from Problem Gambling Foundation, Asian Family Services and Gambling Helpline which are displayed in three areas of the casino.

GRAND CASINO

Host Responsibility

*Problem Gambler
Identification Policy*

(Gambling Act 2003/ sections 308-312A)

Problem Gambler Identification Policy

References: Gambling Act 2003 (¹¹Act¹¹), Sections 308, 309, 309A, 310, 311 & 312A

Objective

The Problem Gambler Identification Policy (¹¹Policy¹¹) has been developed pursuant to the Act to enable Grand Casino to take all reasonable steps to identify actual or potential problem gamblers and to act on that information.

Statutory Requirements

Section 308 of the Act requires the holder of a casino operator's licence who is conducting casino gambling to develop a policy for identifying problem gamblers. This Policy has been developed by Grand Casino pursuant to section 308(1). Using this Policy, all reasonable steps must be taken to identify actual or potential problem gamblers.

Section 309 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of the licence holder, must, after identifying a person who he or she has reasonable grounds to believe is a problem gambler, approach the person and offer information or advice to the person about problem gambling.

The information or advice offered must include a description of:

- (a) The self-exclusion procedure available; and
- (b) Any procedures prescribed by Regulations made under the Act.

After offering information or advice, the holder of a casino operator's licence may issue an exclusion order to the person that prohibits the person from entering the gambling area of the casino venue for a period of up to two years.

Section 309A of the Act requires the casino operator, or person acting on its behalf, to take all reasonable steps to assist anyone who, it has reasonable ground to believe, is a problem gambler, who did not request self-exclusion after being approached but whose ongoing conduct gives rise to reasonable grounds to believe is a problem gambler. The required assistance expressly includes issuing an exclusion order, despite the lack of request to do so, in appropriate cases.

Section 310 of the Act requires that the holder of a casino operator's licence, or person acting on their behalf, must promptly, after being requested, issue an exclusion order to a person that prohibits the person from entering the gambling area of the casino venue for a period of up to two years if the person:

- (a) Has identified himself or herself as a problem gambler; and
- (b) Has made a request to prohibit themselves from entering the venue concerned.

Section 311 of the Act requires that the holder of a casino operator's licence, or person acting on behalf of, must remove any person who enters the gambling area of a casino venue in breach of an exclusion order.

Section 312A of the Act requires a casino operator to keep records of certain specified information about exclusions, including identifying details, the manner, date and length of the exclusion and the conditions of re-entry and provide them if requested by the Secretary.

Scope of Grand Casino Problem Gambler Identification Policy

This Policy describes:

- The legal definition of a problem gambler.
- Indicators of problem gambling.
- A description of sources of indicator data to be used by Grand Casino.
- A description of how indicator data is to be used by Grand Casino to identify problem gamblers; and
- An outline of record-keeping requirements and review of the Policy.

The Policy applies to Grand Casino only.

Supporting Standard Operating Procedures (SOPs)

The following SOPs provide operational guidelines relevant to the Policy:

- Information Collection and Collation.
- Analysis and Intervention.
- Exclusion.
- Gambling Limitation.

Section One - Definitions

Under the Act, a problem gambler is 'a person whose gambling causes harm or may cause harm'.

"Harm" is defined as:

- (a) Harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and
- (b) Includes personal, social, or economic harm suffered:
 - (i) By the person; or
 - (ii) The person's spouse, partner, family, whanau, or wider community; or
 - (iii) In the workplace; or
 - (iv) By society at large.

Section Two - Indicators of problem gambling

Introduction

Grand Casino uses many indicators to assess whether a customer is likely to be a problem gambler. Although these indicators provide an appropriate basis for making determinations as to whether someone is a problem gambler, the nature and range of indicators may vary from one customer to the next. Wherever possible, indicator information should be interpreted in the context of other relevant information to develop an overall assessment of the customer's position.

Based on research and evidence, Grand Casino has developed a list of visible signs and behaviours that may be indicators of gambling-related harm. Some of these can be considered "high confidence" or "strong indicators"

"Strong indicators" are those where the presentation of even one or two indicators is usually sufficient to identify the person as a problem gambler.

Other indicators referred to as "general indicators" are behaviours which may be observed in a range of gamblers but occur more frequently amongst problem gamblers. They are warning signs that may, or may not, indicate a problem if only one or two factors are observed in isolation, but which become indicative when a greater number of signs are observed together or across time.

Problem gamblers can be identified by inferring that harm is present or may occur using the indicators set out below. They can also be identified on the basis of information from customers or persons affected by a customer's gambling behaviour. Customers (and affected persons) may directly disclose that the customer is experiencing problems with gambling or requires assistance (e.g., they want to self-exclude) or do so indirectly.

INDICATORS

Strong Indicators

- Requests to self-exclude.
- Self-identified problem gambler.
- Self-disclosures that may or may not make reference to the person's gambling.
- Third-party disclosures that may or may not make reference to the person's gambling; or
- Severe emotional distress due to gambling, including expression of suicidal thoughts.
- Children left unattended while gambling
- Borrowing money
- Begging
- Repeated ATM visits and/or multiple declined transactions

General indicators

Intensity and Frequency of Play

- Customers whose gambling data (accessed through customer loyalty accounts) is assessed by any staff member as being high risk.
- High visitation frequency (for example, 5 times per week up to daily) combined with high levels of expenditure on gaming machines (for example, \$250+ lost per session) over a period of time (for example 1 month).
- High visitation frequency (for example 2 times per week or more) combined with very high levels of expenditure on gaming machines (for example, \$400+ loss per session) over a period of time (for example, 1 month).
- High visitation frequency combined with very high levels of expenditure on all forms of gambling,

including table games, over a period of time.

- Very few breaks from gambling - almost continuous play.
- Breaching pre-commitment limits and/or multiple increases or disabling of pre-commitment limits.
- Increasing periods of play, and betting more each time, noted over a period of time (noting that gambling expenditure may reduce as the customer's financial resources are exhausted).
- Disconnect with time spent playing, including missing key times (e.g., meals), rushing when leaving machine or staying after friends/family leave; or
- Extreme changes in patterns of play.
- Five hours of continuous play.

Visible Emotional Disturbance

- Emotional distress includes agitation, mood swings, crying, holding head in hands, or out-of-character behaviour.
- Personalising machines, including abuse of machines.
- Irritated by interruptions to gambling.
- Rudeness and complaints to staff about gambling outcomes; or
- Possessiveness of certain machines or table spots (e.g., standing over other patrons, hovering, aggression).

Dysfunction in Social Behaviour

- Attempts to conceal gambling activities, including making phone calls giving excuses for lateness.
- Steps apparently taken to avoid monitoring of gambling activity, such as ceasing to use a loyalty card.
- Not celebrating wins.
- Disintegration of physical appearance (e.g., clothing, or personal hygiene) over time; Family/friends seeking out or enquiring about a customer.
- Falling asleep at a machine or table.
- Claims of malfunction of gaming machines or gaming errors.
- High consumption of alcohol while gambling (e.g., demanding drinks).
- Interaction with a known or suspected loan shark.
- Breach of a Pre-Commitment; or
- Previous breach - history of barring or exclusion orders.

Excessive Access to Money

- Leaving the casino to get additional money and coming back after having appeared to have run out of money.
- Repeated ATM visits and any declines transactions.
- Not having sufficient money to exit the car park.
- Constant demand for complements; or
- Picking up nominal TITO tickets or playing nominal credits.

Expenditure and Frequency of Play

Both expenditure and frequency of play, especially on gaming machines, are currently included as general indicators, rather than as strong indicators, because it is recognised that not all customers who exhibit high expenditure levels and frequent visitation are necessarily problem gamblers. However, such indicators are much more likely to be observed amongst problem gamblers than others and therefore may indicate a greater risk of gambling related harm. It is established from international research that problem gamblers are more likely than other players to lose control of their expenditure, to chase their losses, and to have very strong urges to gamble. Most studies of problem gambling have found that problem gamblers spend significantly more, and gamble significantly more frequently than other players.

Frequency and expenditure data are especially important as indicators in the case of users of gaming machines for several reasons:

- It is easier for people to gamble without being noticed because gaming machine gambling involves very little interaction with casino staff, compared to table games, making it less likely that their behaviour and emotional reactions will be observed.
- There is a stronger relationship between problem gambling and playing on gaming machines than with other forms of casino gambling.
- Electronic data gathering from gaming machines is more accurate than from table games.

Other Observations

The indicators listed above are not exclusive - staff are encouraged to report observations of customers based on other factors which raise concerns.

Section Three - Sources of Indicator Data

The indicators described in Section 2 may emerge from the five principal sources of information Grand Casino collects, collates and analyses. Information sources include:

- Customer disclosures.
- Behavioural observations.
- Customer data including loyalty.
- Third-party disclosures; and
- Interviews with customers or staff.

All information on customers collated from the sources described below is recorded as soon as practicable into iTrak, Grand Casino's incident reporting and retrieval database.

iTrak centralises information from multiple business sources (Security, Surveillance, Host Responsibility and Gaming) which can be shared across appropriate Grand Casino staff.

Host Responsibility uses iTrak to record, manage, review, and assess all information about all customers on the database, including gamblers of interest and excluded or banned customers.

CUSTOMER DISCLOSURES

Customer disclosures may or may not make reference to the person's gambling (i.e., they may be direct or indirect).

Direct disclosures

Direct disclosures make reference to a customer's¹ gambling and examples may include any of the following:

- I think I have a gambling problem.
- I want to be excluded/barred; or
- I don't want to come here anymore.

Indirect disclosures

Indirect disclosures do not make reference to a customer's gambling and examples may include any of the following:

- Comments regarding the impact on personal life.
- Voicing repeated attempts to stop or control gambling.
- Comments regarding psychological distress; or
- Comments regarding financial distress.

The significance of indirect disclosures should be determined by the nature of the disclosure. Indirect disclosures referring to harm, financial difficulties or loss of control would lead to a high suspicion that the person was experiencing, or at risk of experiencing, harm associated with their gambling.

Direct and indirect disclosures from customers must be recorded and sent to Host Responsibility as soon as practicable to be used in making problem gambling assessments.

BEHAVIOURAL OBSERVATIONS

Although staff cannot be expected to watch all customers on all occasions, the process of observation and identification is enhanced by the fact that one may observe a clustering of indicators. Those customers who present with strong indicators, or who produce several common indicators, may produce many more.

In effect, problem gamblers may draw attention to themselves through observable behaviour. Staff should use this information to focus their observations to particular customers.

At the same time, there will be customers where the problematic behaviour may be 'silent' or hidden. Some patrons may gamble very frequently, spend very large amounts of money, but not produce any obvious emotional responses or other indicators to draw attention to themselves. For this reason, staff should remain vigilant to the presence of people who spend many hours in the casino, and who visit very frequently. In such cases, staff should be vigilant for additional indicators of harm. As noted below, frequency of gambling and level of expenditure are indicators in their own right, and ways of identifying people who require additional observation.

Staff who observe the indicators specified in Section 2 must report the observation to the appropriate supervisor/manager. All observations of indicators reported to them by staff and any follow up responses taken by staff and/or supervisors/managers must be logged into iTrak by the supervisor/manager so as to make the record of the disclosure or observation available to Host Responsibility as soon as practicable. The reported disclosures and observations form part of the body of information upon which assessments of problem gambling are to be made.

CUSTOMER DATA INCLUDING LOYALTY

High levels of frequency and expenditure are indicators (see Section 2). Grand Casino will monitor the amount of money and time spent over time proactively using the Loyalty Programme. Although high levels of expenditure and visitation are listed as general indicators, it is important that Grand Casino take steps (where it has concerns about a player's expenditure or visitation frequency) to obtain additional information that places this behaviour into context. For example, through discussions with the customer or other parties, there may be direct or indirect disclosures concerning the lack of affordability of gambling. Alternatively, staff might find that some players who spend very large amounts appear to be chasing their losses, or are making very frequent use of ATMs, or are leaving the casino and then returning with additional money. Grand Casino may also make enquiries about the affordability of losses.

In addition, where a customer is brought to the attention of Host Responsibility by disclosure or observation, Grand Casino must ascertain whether the customer is a Loyalty member. Where the customer is a member of the Loyalty Programme, Grand Casino will examine their data to determine:

- Their time of play.
- Duration of play.
- Turnover.
- Win/loss.
- Patterns of expenditure (e.g., increase over time).
- Games played.
- Tier upgrades.
- Non-gaming use of card (e.g., car park use); and
- Visitation frequency.

Grand Casino will include a flag in the loyalty card database to alert relevant staff that on presentation of an active loyalty card the person presenting the card may be a banned player and that surveillance must be notified to determine this issue. All relevant information will be recorded into iTrak as soon as practicable and made available to Host Responsibility.

THIRD PARTY DISCLOSURES

Information concerning gambling-related harm may also be obtained via third parties. This might include:

- An enquiry from a concerned family/whanau member; or
- A formal enquiry about the potential problem gambler from the wider community, (e.g., probation officer, general practitioner, or employer).

A third party may only seek general information about a customer and will not always voluntarily identify gambling as the cause of their concerns about a customer (e.g., who may be a friend or relative of the inquirer). Where a third party appears to express general concern about a customer, staff must ask if there are concerns that the customer's gambling may be causing problems. Where there is a positive response to this question, this must be recorded in iTrak and made available to Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via Loyalty card use, if available or feasible) should be undertaken. If found, further enquiry must be undertaken, and the customer may be requested to leave the premises for a period of time. If requested to leave, Grand Casino must also provide the customer problem gambling information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

A third-party request that the customer at the casino be removed immediately because of concerns about the customer's gambling is a strong indicator of harm and should be treated on an urgent basis. The third party must be referred immediately to an Authorised Person or Host Responsibility. Details must be taken, including contact details and a brief summary of concerns. An attempt to identify the customer within the venue (e.g., via loyalty card use, if available or feasible) should be undertaken. If found, further enquiry must be undertaken, and the customer may be requested to leave the premises for a period of time. If requested to leave, Grand Casino must also provide the customer problem gambler information, including exclusion options. The action must be logged in iTrak and made available to Host Responsibility as soon as practicable.

All third-party information should be corroborated as part of an internal investigation. The Exclusion SOP outlines the specific steps taken by Grand Casino in corroborating information.

INTERVIEWS WITH CUSTOMERS OR STAFF

From time-to-time, Host Responsibility, Authorised Persons, or other appropriate staff may interview either customers or staff as part of an investigation.

Customer interviews: During the course of an interview, information may be disclosed by a customer that suggests that he/she may be experiencing harm or gambling in a way that may cause harm. All such information must be recorded into iTrak and made available to Host Responsibility as soon as practicable.

Staff interviews: During the course of an interview, information may be disclosed by staff that suggests a customer may be experiencing harm or gambling in a way that may cause harm. This information must be recorded in iTrak and made available to Host Responsibility as soon as practicable.

Section Four - Identification

Section 2 highlights the indicators considered in identifying whether a customer may be an actual or potential problem gambler.

Section 3 identifies the primary sources of information available to identify problem gamblers. It also describes the ways in which this information might be utilised and consolidated so as to assist in the identification process.

Grand Casino must use data from the sources identified in Section 3 to identify customers who are actual or potential problem gamblers, i.e., where their gambling is causing harm, or may cause harm, to the customer or others. Once identified, Grand Casino will determine, based on direct information or inference (using indicators) whether it has reasonable cause to believe that the customer is or has been gambling in a manner that has caused harm or may cause harm.

Depending on the assessment, including the perceived severity and urgency of a situation, Grand Casino provides graduated responses ranging from immediate intervention, advice, and discussion to ongoing monitoring. If there is reasonable cause to believe that a customer is a problem gambler, Grand Casino's legal obligations under sections 309-312A of the Act are engaged immediately.

Obligation to Identify

The assessment by Grand Casino, whether there is reasonable cause to believe that a customer is a problem gambler, must be made in good faith, in accordance with the statutory test and within a reasonable timeframe.

Analysis of Information

As outlined in Sections 3 and 5, all disclosures or observations related to indicators of harm noted by staff are reported to, and recorded by, the supervisor or manager and made available to Host Responsibility.

When a disclosure or observation report is made available to Host Responsibility, Host Responsibility must collate and review all information available to it in relation to the relevant customer. This includes a review of incident reporting and loyalty databases and other relevant internal information sources. Host Responsibility may also make further enquiries of relevant staff in relation to that customer.

Host Responsibility undertakes a section 309 assessment based on the information collated.

A variety of different types of information is used when undertaking a section 309 assessment, taking into account:

- Severity of presenting indicators.
- Anti-social behaviour including uncharacteristic or unusual behaviour.
- Uncharacteristic changes in appearance.
- Changes in patterns of play; and
- Number of indicators and repetition over time.

Identification

Strong indicators

Direct disclosures by customers are expected to result in an immediate assessment that a customer is a problem gambler, with Grand Casino taking the required steps in response promptly.

The presence of any strong indicator should be sufficient to indicate that the customer is very likely to be a problem gambler unless another more likely explanation is established.

For instance, although emotional distress may be a reliable and valid indicator of gambling-related harm, not all people who appear distressed will necessarily feel this way because of gambling. Therefore, if this strong indicator is evident, it would be appropriate to interpret the person's behaviour in the context of other indicators. For example, is the person gambling large amounts of money for prolonged periods and displaying other signs of gambling-related harm? If a person only appears distressed, such people should be approached initially on the assumption that they require general assistance, but not necessarily because their gambling is a problem.

General indicators

The observation of small clusters of general indicators should be sufficient to trigger further monitoring but, depending on the circumstances, may not necessarily lead to an immediate assessment that the customer is a problem gambler. As part of a graduated response, it is expected that such people should be subject to further monitoring to determine whether any further general indicators emerge, including the repetition of the same indicators. If there is an accumulation of general indicators over a period of time (e.g., several general indicators recur during a one-month period) Grand Casino would have reasonable grounds to consider such people to be problem gamblers.

Consequences of Identification

Once it has reasonable cause to believe that a customer is a problem gambler, Grand Casino must:

- (a) Offer information or advice to the customer about problem gambling including a description of self-exclusion procedures, within a reasonable time of identification, taking into account the urgency of the situation and the risk of harm
- (b) Issue an exclusion order immediately if requested to do so by the customer; and
- (c) Consider whether it would be appropriate to issue an exclusion order without any request to do so as a means of providing assistance to the customer.

Grand Casino will also provide contact details for problem gambling service providers.

Section Five - Record keeping

Recording, collation, and analysis of information

Host Responsibility is responsible for the collation, analysis and electronic recording of all information relating to indicators of harm. Host Responsibility also keeps records of observations noted by Frontline staff, supervisors/managers, Authorised Persons, and of all direct and third-party disclosures, interactions and interventions undertaken in relation to a customer by Frontline staff, supervisors/managers, and Authorised Persons.

Host Responsibility also records the problem gambler assessment referred to in Section 4 above, and the outcome of that assessment.

As outlined in Section 3, all information collated by Grand Casino in relation to a customer is recorded as soon as practicable into iTrak.

Host Responsibility uses iTrak to manage, monitor, review and assess information about all customers on the iTrak database, including gamblers of interest and excluded or trespassed customers.

GOI files

A key purpose of a gambler of interest ("GOI") file is to institute a formal monitoring process in relation to a customer. A GOI file is opened by Host Responsibility:

- In circumstances where a customer has come to the attention of Host Responsibility for monitoring.
- A third-party disclosure is made in relation to a customer's gambling; or
- A customer returns from exclusion having fulfilled the re-entry criteria.

Grand Casino may also open a GOI file in other circumstances, as may be appropriate, including where:

- Information is requested or presented from government agencies; or
- Suspected or actual undesirable activity is present, including unattended children, unaccompanied minors, or breaches of trespass orders.

Once opened, all available customer data to assist the assessment of whether a customer is a problem gambler must be obtained and placed on the file. In the case of customers who come to attention as a result of expenditure and visitation frequency, a GOI file must be open so that further information and observations can be recorded for assessment.

Grand Casino will regularly review GOI files at a minimum, at the following intervals and more often as required:

- Monthly review for the duration of the investigation; and
- Formal 6-month review.

Whenever new information becomes available or is obtained, a problem gambling reassessment must be undertaken. If an assessment is made that the customer is not a problem gambler after the 6-month review, the GOI file may be deactivated. In the case of returning excluded customers, the GOI file must remain open and kept under review for at least 6 months. If concerns remain, the file will be left open and reviewed on a regular basis.

All deactivated GOI files will be retained by Grand Casino. A GOI file may be reactivated at any stage subsequent to the 6-month review period if further information or indicators in relation to a customer emerge. In this case, a problem gambling reassessment will be undertaken, and monitoring may continue.

Whenever an exclusion order is made, whether at the request of a customer or as a result of a decision taken by the casino operator to assist a suspected problem gambler, all of the information required by section 312A must be recorded on the relevant GOI file, retained, and provided to the Secretary if requested.

Section Six - Review

The Problem Gambler Identification Policy will be measured and monitored as part of the Grand Casino Host Responsibility Programme.

Where new evidence emerges in relation to indicators of harm and identification of problem gamblers, Grand Casino will review its Problem Gambler Identification Policy accordingly.

Our Programme and PGIP are constantly being reviewed. When an enhancement is identified by observations or development resources, we will act accordingly, even though the Programme or PGIP may not formally be changed.

