RESPONSIBLE GAMBLING CODE OF CONDUCT

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1. Responsible Gambling Message

Pareto Phone Pty Ltd ('PP') is committed to selling raffle tickets in a responsible manner and the following message will be displayed on PP premises and the relevant website.

Pareto Phone fosters a commitment to provide a responsible gambling framework and will endeavour to provide services in a responsible manner. This code of conduct is an integral part of that commitment.

2. Availability of the Code of Conduct

PP's code of conduct will be made available to all call centre staff and for customers a copy of the code of conduct will be available upon request to the nominated person. The code will be available via mail, email or fax and on PP's website.

3. Responsible Gambling Information

Information about the following is available on PP's website at www.paretophone.com :

a) How to gamble responsibly; www.betsafe.com.au

b) Access to the Commonwealth Government's website: www.understandingmoney.gov.au

c) Access to gambling support services

d) Access to the relevant state government's problem gambling support website.

e) Restrictions on the provision of credit for gambling

At the conclusion of every telephone conversation where a customer has bought tickets in the draw, the customer is supplied with a telephone number where they can:

a) Request more information about the Raffle
b) Cancel or amend a ticket order (until the day before draw)
c) Change their entries in a raffle to a donation

Pareto Phone runs an opt-in do not call list for Raffle related telephone calls.

Once a customer has elected to not be called for Raffles they will not be called for all subsequent campaigns.

4. Gambling Product Information

Information relating to raffle entry terms and conditions will be made available at the time of the call, or by calling the raffle enquiry line, and will be printed on tickets and promotional material.

5. Interaction with Customers

PP call centre staff will upon request or when a customer displays any indicators of stress relating to a gambling problem,

a) Provide information relating to access to Gamblers Help services, including self exclusion and financial advice.

b) Offer a call back date if the customer wishes to purchase raffle entries.

c) Provide the Raffle Enquiry Line number whereby purchasers are able to amend or cancel their pledge.

d) Not engage in pressure sales techniques.

e) Offer to escalate the call to the nominated person within the organisation.

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

6. Interaction with Staff

PP does not allow its employees to purchase tickets in raffles conducted by Pareto Phone Pty Ltd.

Employees who request information about help with a gambling problem, or who show any indicators of a gambling problem, not confined to raffle purchases, will be assisted by the nominated person. The nominated person will provide the employee with referral details to a Gambler's Help Service and/or Gambler's Help Service material. The nominated person will ensure that all reasonable steps are taken to address the situation, and will do so in a manner that guarantees the employee's rights to privacy are not compromised.

7. Interaction with Problem Gambling Support Services

The nominated person of PP will regularly contact Gambler's Help services (at least annually) to remain updated with publications and to ensure contact details are updated on a regular basis. Any changes or updates will be communicated to all staff as soon as it is reasonably possible to do so.

8. Customer Complaints

Complaints received regarding PP's Responsible Gambling Code of Conduct will be recorded and complainants may be asked to record their complaint in written form, directed to PP's Nominated Person.

- The complaint will be acknowledged within 1 week.
- PP will assess whether the complaint is relevant to the Responsible Gambling Code of Conduct and advise the customer in writing.
- Where further investigation is required, the customer will be informed on the progress of the complaint, and the final outcome (Including actions taken and complaint resolution) will be sent to the customer in written form.
- Complainants who request an independent review of a complaint, the matter will be referred to independent mediators and costs will be shared equally between both parties.
- The complaint will be recorded on PP's Complaints Register.

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

9. Compliance with the Prohibition on Gambling by Minors

PP will not knowingly sell tickets to minors and call centre staff will take all reasonable measures to qualify that the customer is 18 or older.

10. The Gambling Environment

To ensure a responsible gambling environment PP will discourage repetitive and/or excessive purchases of raffle tickets by customers by:

- Setting a limit on the value of tickets purchased ($500).
- Analyse databases to detect patterns of excessive purchases (Refer to section 5 if patterns are detected or gambling problems are disclosed by the customer)

- Not engage in high pressure sales techniques.

11. Financial Transactions

PP will not cash cheques or extend credit to customers to purchase raffle tickets. This policy will be relayed to the customer at the time any such request is made.

If there are indicators that the customer has a gambling problem, or the customer discloses a gambling problem, then the provisions outlined under section 5 will be implemented.

12. Responsible Advertising and Promotions

In the event that PP was to undertake any advertising or promotion on behalf of a client, PP will:

a) Comply with advertising code of ethics adopted by the Australian Association of National Advertisers (AANA).

b) Not engage in false, misleading or deceptive advertising.

c) Ensure advertisements are not to be offensive or indecent in nature.

d) Not create an impression that entering a raffle is a reasonable strategy for financial betterment.

e) Not include false, misleading, or deceptive advertising about odds or prizes or chances of winning.

f) Not publish any form of advertisement which identifies customers who have won a prize without prior consent.

g) Not promote the consumption of alcohol while buying raffle tickets.

Prior to publishing, management will review all advertising against the above standards.

13. Review Process

The code of conduct will be made available in the induction manual distributed to each new and current employee to ensure they are informed about the responsible gambling measures employed by PP.

Any feedback or issues raised by PP staff at weekly meetings will be addressed by senior management to ensure adherence to the code of conduct in all relevant departments and operations.

14. Review of the Code

A review of the operation and effectiveness of this code will occur annually on the anniversary of the date of implementation. PP also encourages any input or feedback from relevant staff, management or customers to ensure that the code of conduct remains effective in achieving its purpose.

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Ph: 073015 4000. Fax: 07 3015 4088. Email: enquiries@paretophone.com

COMPLAINT FORM

Name	
Address	
Contact No.	
Fax No.	
Email	
Preferred method of contact: Email-Mail-Fax (Please circle one)	

Please explain the details of your complaint
Please attach extra paper if there is insufficient space

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Signature _____

Date _____

Office Use Only

Date Received	
Accepting Officers Name	
Accepting Officers Signature	