GAMING PLAN OF MANAGEMENT

LAST REVIEWED: 18 MAY 2023

Introduction

Club Engadine RSL is committed to responsible gambling and as such have developed a plan of management in consultation with Club Engadine RSL board and management team to promote responsible service and delivery of gambling products.

This plan highlights our current initiatives and support services that are available to our customers and team to improve the overall standard of customer care and encourages a responsible gambling culture.

This Gaming Plan of Management has been adopted at:

Club Engadine RSL (Engadine RSL & Citizens Club Ltd LICQ300243923) – 1029 Old Princes Hwy, Engadine NSW 2233

A copy of this document can be found in-house and on our website.

As at the date of this Gaming Plan of Management Club Engadine RSL does not trade beyond 2am and is not located in a Band 3 SA2.

For more information, please email responsiblegambling@ramsgatersl.com.au

ClubSAFE Premium Member

Club Engadine RSL are a member of ClubSAFE Premium which is the club industry's leading best practice and preferred responsible gaming program in NSW. It is based on a Multi-Venue Self-Exclusion (MVSE) program designed to assist people with a gambling problem by self-excluding them from multiple venues around which they live, work and socialise.

Our Venue

Rewards Loyalty Program

Engadine Rewards Loyalty Program

A loyalty program is offered at Club Engadine RSL which allows members the opportunity to accumulate points for the purchase or use of eligible goods and services. The number of status points earned by members over a rolling 3- month period determines their eligibility for rewards tiers during the period of the membership of the program.

Upon becoming a member, patrons are presented with the following information about their respective rewards loyalty programs:

- · The rules of the loyalty program including where bonus points can be accrued and redeemed;
- · How rewards are achieved;
- · How rewards expire;
- · How to opt-out of the program

Members have the opportunity to 'opt-out' of the loyalty program at any time in writing or in person.

Our loyalty program is compliant with all responsible gambling legislation. Club Engadine RSL is constantly reviewing our loyalty program on offer to ensure we continue to act responsibly whilst giving our members a great customer experience.

Our Customers

The decision to gamble lies with the individual and represents a choice, and in order to properly make that choice individuals must have the opportunity to be informed.

Club Engadine RSL is committed to providing appropriate information to all individuals including those from different cultural and linguistic backgrounds, so they are able to make informed decisions consistent with their personal preferences and individual circumstances.

Club Engadine RSL takes the issue of responsible gambling very seriously and actively promote the following initiatives to ensure all patrons to our club are aware of such services available to them.

Self-Exclusion

The ClubSAFE Multi-Venue Self-Exclusion (MVSE) Program is an online system designed to enable people with a gambling problem to self-exclude from our venue as well as multiple venues around where they live, work and socialise. Club Engadine RSL will initiate self-exclusion when requested by a patron at any time during its open hours.

The ClubSAFE MVSE Program removes barriers for people with a gambling problem such as the difficultness of visiting multiple venues or the embarrassment of visiting their local club to place the exclusion and makes the process easier for a person with a gambling problem.

A patron can self-exclude by speaking to a duty manager at the club or by contacting a gambling help counsellor.

The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the club for a specific time, our venues have processes in place to help them honour that commitment.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors. Club Engadine RSL also has facial recognition technology to assist in identifying self-excluded patrons entering the premises.

Partial Self-Exclusion

A partial self-exclusion allows a patron to exclude themselves from gambling activities at the club such as TAB/KENO and/or gaming machines, but still allows them access to other club facilities including restaurants, bars and other entertainment.

A patron can self-exclude by speaking to a duty manager at the club or by contacting a gambling help counsellor.

The minimum period for a self-exclusion is six months. Once a patron agrees to stay away from the gaming activities of the club for a specific time, our venues have process in place to help them honour that commitment.

If a patron breaches their self-exclusion, it is reported through the MVSE program for assessment by trained counsellors.

Counselling Services

As required by law, Club Engadine RSL display problem gambling brochures at critical points within the venue and have a wide range of these brochures in many languages to help with our culturally diverse community. These brochures contain details about the ClubSAFE Counselling Service and Gambling Help Line:

ClubSAFE Counselling Service – 1800 997 766 GambleAware Helpline – 1800 858 858

The management team at our venue are proactive in handing out the relevant information to patrons in need. Club Engadine RSL will display information about local support services in strategic locations, like the bathroom and on rolling digital displays.

Our Customers

Welfare Checks

Club Engadine RSL aims to ensure all our patrons have a positive experience this includes undertaking welfare checks on any guests who may be at risk of problem gambling. Our management and frontline team are vigilant in monitoring our patrons undertaking any gambling activity. If they are showing signs of extended play or distress, a duty manager will conduct a welfare check to gauge their mood, stress level and assertiveness and if required undertake the steps necessary whether that be encouraging them to take a break, explaining our exclusion or counselling services or asking them to leave the environment.

All encounters are recorded in our internal Customer Relations Management (CRM) system. Indirect interactions such as daily announcements are made over the Clubs PA system to encourage customers to take regular breaks from gaming machines. Such announcements are regarding other events, promotions or services (such as courtesy bus departures) that are underway.

Our Team

Club Engadine RSL are committed to facilitate staff training so that we can continue to improve the way we provide a responsible environment for gambling and customer care. Our staff undertake annually in-house training and refreshers on our policies and procedures.

Staff Training and Awareness

As legislated, all Club Engadine RSL employees undergo regular Responsible Conduct of Gambling (RCG) training to equip them with the skills and knowledge to identify the signs of risky and problematic gambling behaviour and assist problem gamblers.

In addition to the mandatory training, our team undergo regular training sessions:

- Multi Venue Self- Exclusion delivered by ClubSAFE
- Responsible Gambling delivered by ClubSAFE (which includes communication skills training to support staff to approach
 patrons identified as risk)
- Compliance Officer Course delivered by ClubSAFE
- Rewards Loyalty Program delivered by an external facilitator

These annual training sessions are vital in keeping our team up to date with industry updates, legislation and most importantly methods to ensure we are adhering to customer care and making it clear to staff that patron welfare is of the utmost importance. Such training sessions give our team the forum to discuss and establish appropriate policies, procedures and lines of responsibility to provide customer care. These include house policies, clear accountability, reporting mechanisms and follow up procedures for dealing with responsible gambling issues.

Responsible Gambling Officer

The Duty Manager or supervisor, depending upon whom is on shift, will also act as the Responsible Gambling Officer (RGO). The RGO must oversee the implementation of this Gaming Plan of Management.

The Duty Manager or supervisor, depending upon whom is on shift, will fulfil the role of RGO from midnight on any day of late trade and is required to hold a current Responsible Conduct of Gambling (RCG) accreditation.

The role of the Duty Manager or supervisor as RGO will include:

- Recording and escalating responsible gambling related incidents, and the actions taken to address them, in the Gambling Incident Register, including third party complaints
- · Conducting gambling conversations with patrons
- Processing and enforcing self-exclusions
- · Offering practical assistance options to patrons, including information on counselling and support services
- · Providing assistance as required with responsible gambling, including responsible gambling strategies and breaks in play
- Ensuring the Club's RCG compliance obligations are met, including signage, minors, payout requirements, etc)
- · Receiving and documenting responsible gambling complaints
- Ensuring that the Club's GPOM is being followed.

Club Engadine RSL will also make available to patrons information in its feedback on how to make a complaint to us about Club Engadine RSL's approach to the Responsible Conduct of Gaming ("RCG").

Club Engadine will at all times maintain a robust customer feedback policy which includes specific arrangements for RCG related complaints (e.g. such complaints go to the CEO and COO only to maintain confidentiality).

Gambling Incident Register

Club Engadine RSL will keep and maintain a gambling incident register.

The gambling incident register will record:

- (a) any gambling related incident observed by the staff of Club Engadine RSL and determined to be a strong sign that the individual may have a problem with their gambling as per ClubSafe Responsible Gambling training;
- (b) the time, location and machine number(s) and brief description (or identity, if known) of any gaming machine player identified displaying or engaging in that behaviour;
- (c) any proposed or implemented self or third-party exclusions of gaming machine players (specifying the player's name (where provided or known), membership number (if applicable) and duration of any exclusion) and the patron's response to the same; and
- (d) Any breach or attempted breach of a self or third-party exclusion observed by Club Engadine RSL.

The gambling incident register must also record details of the action taken in response to the incidents, applications and other matters recorded in the register.

Club Engadine RSL must review the gambling incident register at least on a monthly basis and must consider whether an exclusion order is appropriate for any person who has been asked to self-exclude but has declined to do so.

The information recorded in a gambling incident register will be retained for at least 3 years from when the record was made.

Club Engadine RSL, at the request of a police officer or L&GNSW inspector, make any gambling incident register available for inspection.

Staff Gambling Policy

Club Engadine RSL staff are not permitted to use any gaming facilities at either venue, including Gaming Machines, TAB, Keno or Bingo, at any time.

Club Engadine RSL are committed to supporting and advancing employee wellbeing through appropriate information and training, the provision of employee assistance programs and the implementation of a wellbeing initiative that foster healthy outcomes and advance diverse, inclusive, safe and responsible working environments.

NSW Legislation

Minors/Persons Under 18 Years

Club Engadine RSL is a licensed venue, and as such, no person under the age of 18 is permitted entry into any part of the club, unless they are in the company of an adult or guardian.

Gambling by minors is prohibited. Failure to comply will result in the person being asked to leave.

Signs are displayed at all gaming room entrances banning minors from entering the room. All Club Engadine RSL employees share the responsibility for asking for proof of age if they are uncertain whether a customer is at least 18. If relevant verification cannot be produced, the customer will be asked to leave the gaming room.

Financial Transactions

Club Engadine RSL adhere to the strict rules and regulations relating to the positioning of ATM and EFTPOS Terminals around the gaming floor.

Our club does not cash cheques from customers under any circumstance.

Winnings \$5,000 and below can be claimed in either cash, cheque or EFT. By law any winnings over \$5,000 will be issued as a cheque or EFT only. Winnings will only be issued to the person playing the machine at the time of the win.

Keno winnings up to \$5,000 will be issued in cash. Any winnings over \$5,000 are handled by Keno and the club will be contacted to arrange remaining payment to the player as per Keno terms and conditions.

TAB winnings are paid by cash or into the players account as per TAB terms and conditions.

Venue Gambling Signage and Information

Weekly checks are undertaken by our team at Club Engadine RSL to ensure all gaming compliance signage is up to date and maintained. External audits are also undertaken every quarter at the club by Club Safe representative to ensure we are meeting legislative requirements.

All advertising and promotions related to gaming undertaken within our club comply with the Liquor & Gaming NSW advertising guidelines. Club Engadine RSL includes responsible gambling messages on its website, and in its newsletters and loyalty program marketing.

Player Activity Statements

Our venue is required by law, to present members with a Player Activity Statement free of charge, should they request it. A Player Activity Statement show in a chosen month the player's total amount of turnover, total wins and net expenditure, the total points earned and redeemed through the club's rewards program as a result of playing gaming machines, the entire length of time the player's card was inserted into gaming machines, and gambling help information.

If you wish to request a player activity statement, please speak to a Duty Manager.

Gaming Floor Shut Down

All venues are required by law to shut down their gaming floor operations for a minimum of 6 hours per 24-hour period, to facilitate machine audits and cleaning. Club Engadine RSL's shut down occurs between 4am – 10am everyday.

NSW Legislation

Community Contributions

All licensed venues in NSW are required by law to return a minimum 2.25% percentage of all gambling profits to the community. Club Engadine RSL contributes well above the required amount every year, through ClubGRANTS and community contributions.

Venue Layout

A current plan of Club Engadine RSL showing the gaming machine areas and the overall premises ("Premises Plan") is attached as Appendix I. The Premises Plan indicate the location of the:

- gaming rooms
- current layout of gaming machines
- cash dispensing facilities (being ATM and CRT)

This Gaming Management Plan, for the avoidance of doubt, does not need to be updated if there is a change to:

- (i) the gaming machine layout within the gaming areas or CRT location within the club (subject to any applicable legislative requirements); or
- (ii) a change to the location of the ATM within the non-gaming areas of the of the Club (subject to any applicable legislative requirements).

Review of Club Engadine RSL's Gaming Plan of Management

This Gaming Plan of Management will be available at reception and available to all staff through the staff intranet. The operation and effectiveness of this strategy is reviewed regularly. The review process includes an opportunity for feedback from all relevant stakeholders including venue staff, customers and problem gambling support services.

Club Engadine RSL welcome feedback at any time, by writing to:

Mail: CEO

> Ramsgate RSL Memorial Club Cnr Ramsgate Rd & Chuter Ave, Sans Souci NSW 2219

Email: responsiblegambling@ramsgatersl.com.au

Online Enquiry: www.clubengadine.com.au

Local Liquor Licensing Police

Contact Details

Name: Darrin Thompson Mobile Number: 0400 336 834

Station Name: Cronulla

Station Address: 34 Kingsway Cronulla NSW 2230

Station Telephone Number: 9527 8154 Email: thom I dar@police.nsw.gov.au

This Gaming Plan of Management will be immediately produced for inspection upon request by NSW Police or L&GNSW inspectors.

Appendix I

