

# Responsible Gambling Policy

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# Statement

As one of the leading Bingo operators in the UK, Buzz Group Ltd. truly understands the value and importance of responsible gambling and promoting this outlook to our customers.

Buzz Group Ltd. makes financial contributions to prevent and treat gambling related harm, this includes an annual contribution to the Responsible Gambling Trust.

As a brand we are amongst the most trusted in the industry in our field. We ensure our business operates in a responsible manner by always aiming to give our customers the best possible experience when using our services. We value and respect our customers and want them to enjoy their gambling in a safe and responsible manner.

We do understand however, that for a minority of people, gambling can unfortunately cause personal, social, financial or health related problems. Therefore, we are fully committed to doing all that we reasonably can to promote responsible gambling and enable the small number that do develop problems to get the help and support they need.

This policy displays how as a business we are committed to responsible gambling and how our colleagues are expected to promote this ethos to our customers.

## Policy Overview

Buzz Group Ltd.'s policy objective is to make sure we comply and adhere to the licence objective, "to protect children and other vulnerable persons from being harmed or exploited by gambling".

To make sure this happens, we ensure we go above and beyond our regulatory requirements, and ensure guidance published by the Gambling Commission is adhered to. With this in mind, we commit to:

Enabling our customers to enjoy gambling responsibly and have a fun experience.

Educating and informing customers so they can be responsible for their own gambling behaviour.

Encouraging and assisting customers to stay in control whilst gambling.

Recognising and protecting potential problem gamblers and helping them to be able to stay away from harm.

Promoting products in a socially responsible manner and never targeting children or vulnerable persons.

Training all staff members to ensure responsible behaviour and to educate them to help protect customers from problem gambling.

Raising awareness and recognising problem gambling.

Ensuring our Bingo sites both remote and non-remote are safe and secure.

# Owner and Approval

This policy is owned and approved by the Director of Risk and Compliance and has additionally been approved by the Digital Director.

## Organisation Structure and Responsibilities

Who	What	When	How	Result
<b>Chief Executive Officer</b>	Some responsibility and accountability for the Policy	Quarterly Risk and Compliance meeting	Meeting with Director of Risk and Compliance	Review the effectiveness and compliance with current legislation
<b>Director of Risk and Compliance</b>	Overall responsibility for RG and RG Policy	Quarterly Risk and Compliance meeting	Documented commentary on the Policy and effectiveness and compliance with current legislation	Review the effectiveness and compliance with current legislation
<b>Head of Data Security and Compliance</b>	Responsibility for RG and RG Policy/Overseeing work and responsibilities of Compliance Manager	As and when required	Review of Compliance Manager's work and offering guidance if required	Review the effectiveness and compliance with current legislation
<b>Compliance Manager</b>	Receiving and reviewing of concerns related to RG from clubs and customer services	As and when required/reported	Acquiring all possible facts to piece together any cases or concerns initially escalated	All RG cases stored securely and escalated where required
	Reviewing all RG reports where customers appear due to hitting pre-determined thresholds	As and when required/reported	Assessing and reviewing as is necessary. Escalating where required and gathering information where necessary	Customer review compiled and stored securely, with evidence included to back up the decision
	Responsible for delivering RG training which will be accessible to all employees internally on the Intranet	Annually	Online Training	Ensure training completion is logged

	Setting up, implementing and improving RG controls and procedures	As and when required	Identifying gaps where RG measures need putting in place or improving	Documented processes and procedures
<b>Regional Directors</b>	Follow up any issues if the General Manager does not carry out checks required	As and when required		
<b>Club General Managers</b>	Responding to the Compliance Manager with any information requests	As and when required	Responding as requested through appropriate channels	
	Escalating all concerns in relation to RG to the Compliance Manager	As and when required	Contacting Compliance Manager, by phone or email, with full details about concerns	Information logged and considered for escalation by Compliance Manager
<b>Customer Service Manager</b>	Responding to the Compliance Manager with any information requests	As and when required	Responding as requested through appropriate channels	
	Escalating all concerns in relation to RG to the Compliance Manager	As and when required	Contacting Compliance Manager, by phone or email, with full details about concerns	Information logged and considered for escalation by Compliance Manager

**The Chief Executive Officer (CEO)**

The Chief Executive Officer (CEO) has some accountability and responsibility for the RG Policy. The CEO will meet with the Director of Risk & Compliance quarterly to review the effectiveness and compliance with current legislation.

**The Director of Risk & Compliance**

The Director of Risk & Compliance has overall accountability and responsibility for RG and the RG Policy. The Director of Risk & Compliance will meet with the CEO quarterly to review the effectiveness and compliance with current legislation.

**The Head of Data Security & Compliance**

The Head of Data Security & Compliance will have responsibility for RG and the RG Policy and will oversee work produced by the Compliance Manager, including proposed RG controls, processes and procedures to be implemented or improved upon.

**The Compliance Manager**

The Compliance Manager is responsible for setting up, implementing and improving any necessary RG controls, processes and procedures. The Compliance Manager is to review all

reports and information received where responsible gambling is concerned. The Compliance Manager will produce RG training and ensure all staff who work in areas where problem gambling may be a factor receive adequate training.

### **Regional Directors**

In any circumstances that a General Manager has not carried out sufficient RG checks, on behalf of the Compliance Manager, within a reasonable time of being requested, appropriate measures are taken to ensure this is rectified.

### **General Managers**

General Managers are to respond promptly to the Compliance Manager with as much information as possible when a RG query has been raised concerning their particular club. Equally when any concerning behaviour has been identified that the Compliance Manager may not be aware of, as much information as possible must be escalated and passed to the Compliance Manager to review.

### **Customer Service Manager**

The Customer Service Manager is to respond promptly to the Compliance Manager with as much information as possible when a RG query has been raised concerning a club or online customer. Equally when any concerning behaviour has been identified that the Compliance Manager may not be aware of, as much information as possible must be escalated and passed to the Compliance Manager to review.

## **Our Principles**

As a responsible gambling operator, Buzz Group Ltd. wants to:

**Educate** – We believe in giving customers the tools and information they need to gamble enjoyably, responsibly and within their limits.

**Protect** – We want to ensure customers stop gambling before they get out of control and protect them from potential harm.

**Act** – We want our staff to know when a customer may be showing signs of problem gambling and step in to help.

It is important for our colleagues to understand their responsibilities when it comes to promoting responsible gambling and ensuring that each and every customer is receiving the best experience.

## **Under Age Gambling**

As a responsible operator we are committed to protecting children and young persons and have measures in place to prevent under age access to our services.

### **Online**

An age verification check is carried out upon first deposit or withdrawal and if we cannot verify the customer's age within 72 hours the account will be suspended, and the customer will be unable to gamble. If we discover that the customer is under 18, deposited funds, less any winnings, will be returned.

Occasionally we may have to request documentation from our customers to prove their age, where we are unable to do this through our internal checks.

We use internal test scripts to confirm our online processes regarding age verification are in full working order.

### **Club**

In club we apply a 'Think 21 Policy' and 'Think 25' in Scotland. If we have reason to believe the customer is under 21/25 years of age, we will not allow them to enter and use our premises unless they can prove to our reasonable satisfaction that that they are not under the age of 18. In instances such as these we require the customer to provide us with satisfactory identification documents (Driving Licence with photo card, Passport or ID with the PASS logo) if asked to do so. These documents must:

- Contain a photograph from which the customer can be identified
- State the date of birth
- Be valid (that is not expired or out of date) and
- Be legible and show no signs of tampering

## **Help and Support**

We make clear to our customers the help and support organisations that are available to them:

### **GamCare**

Website: [www.gamcare.org.uk](http://www.gamcare.org.uk)

UK National Helpline: 0808 8020 133

### **Gamblers Anonymous**

Website: [www.gamblersanonymous.org.uk](http://www.gamblersanonymous.org.uk)

### **GambleAware**

Website: [www.begambleaware.org](http://www.begambleaware.org)

UK National Helpline: 0808 8020 133

### **National Problem Gambling Clinic**

Website: [www.cnwl.nhs.uk](http://www.cnwl.nhs.uk)

Urgent Advice Line: 0800 0234 650

We offer the following tools to our customers to help limit and control their gambling levels:

### **Online**

#### **Deposit Limits**

We enable customers to set daily, weekly, monthly (or a combination of all) deposit limits on their accounts.

#### **Time Outs**

We enable customers to take a break from gambling and offer time-outs from 24 hours to 6 weeks.

#### **Reality Checks**

We enable our customers to establish a reality check which helps keep track of the time spent gambling. When the period of time selected elapses, an automated message appears reminding customers of how long they have been playing, and requires customers to select one of three options: Continue, Exit or View Account History.

### **Self-Exclusion**

Customers have the option to Self-Exclude for a period of 6 months to 5 years. Customers can also Self-Exclude from all remote operators licensed by the Gambling Commission through GamStop, a link of which is provided for customers from our website.

### **Club**

#### **Self-Exclusion**

Customers have the option to Self-Exclude for a period of 6 to 12 months. In order to Self-Exclude from all bingo clubs nationwide, who are members of the Bingo Association, customers must present a photograph of themselves. If customers refuse to do this, we have a process in place whereby we can 'suspend their membership' for Buzz Group Ltd. and they will not be able to access any of our bingo clubs during the period requested.

Where customers have Self-Excluded their online account this is extended to clubs and vice versa – ensuring total brand exclusion.

## Training

Buzz Group Ltd. will ensure that its employees have the training, knowledge and ability to carry out their work with an awareness of responsible gambling.

As a standard, all employees will be required to complete Responsible Gambling training and receive refresher training annually. This will be arranged by the Risk & Compliance Team.

## Monitoring and Review

This Policy will be reviewed annually by the CEO, Director of Risk & Compliance, Head of Data Security & Compliance and the Compliance Manager to monitor its continuing relevancy and effectiveness, taking into account influencing factors such as legislative changes, working practices and feedback.

## Amendments to this policy

The Company will periodically review this policy and the Company reserves the right to vary, amend or withdraw the policy. Any policy changes will be communicated accordingly.