



Tatts Lotteries
Responsible Gambling
Code of Conduct
New South Wales

JULY 2013

Introduction

Tatts Lotteries conduct world class lottery operations across multiple jurisdictions within Australia under the Tatts, Tatts Quick, Golden Casket, NSW Lotteries, NSW Lotteries Express and SA Lotteries brands and is committed to Responsible Play throughout the states and territories in which we operate. Tatts Lotteries' games are available through an extensive network of over 4,000 retailers, who are committed to providing games in a safe, secure and friendly environment.

For most people, playing lottery games is fun and entertaining. Lottery play is rarely associated with causing problem gambling. Notwithstanding this, Tatts Lotteries has developed Responsible Gambling Codes of Conduct for each state and territory in which we operate as the cornerstones of our Responsible Play Program.

The Responsible Gambling Codes of Conduct act as guides for the responsible service delivery and unfaltering commitment that the community can expect from Tatts Lotteries and its retailer network.

Objectives

- To ensure that lotteries remain a socially responsible, fun and entertaining experience.
- To provide a framework for Tatts Lotteries and its retailer network for the continued responsible delivery, marketing and sale of its lottery products.
- To continue to demonstrate Tatts Lotteries' unwavering commitment to responsible business practices and community support.

1. Definitions

Tatts Lotteries means Tattersall's Sweeps Pty Ltd, ABN 99 081 925 662 of Level 1, 411 Collins Street, Melbourne Victoria; Tatts NT Lotteries Pty Ltd ABN 18 146 244 984 of Level 1, 411 Collins Street, Melbourne Victoria; Golden Casket Lottery Corporation Limited, ABN 27 078 785 449 of 87 Ipswich Road, Woolloongabba, Queensland; New South Wales Lotteries Corporation Pty Ltd, ACN 142 890 195 of 1 Figtree Drive, Sydney Olympic Park, New South Wales and Tatts Lotteries SA Pty Ltd, ACN 146 245 007 of 188 Richmond Road, Marlestone South Australia.

NSW Lotteries means New South Wales Lotteries Corporation Pty Ltd.

Authority means the New South Wales Casino, Liquor and Gaming Authority.

Outlet means the place of business of a Retailer and for the purpose of this document includes NSW Lotteries outlets and NSW Lotteries Express outlets.

Retailer means the person(s) who has been granted a NSW Lotteries agency and for the purpose of this Code includes the websites www.nswlotteries.com.au and www.nswozlotteries.com

Websites means the NSW Lotteries website, www.nswlotteries.com.au and the Oz Lotteries website, www.nsw.ozlotteries.com

2. Commitment to Responsible Gambling

NSW Lotteries and its Retailers are committed to providing the highest standards of customer care and responsible gambling. We support and encourage the responsible play of our lottery games and are committed to the Tatts Lotteries Responsible Play Program. The Tatts Lotteries Responsible Gambling Codes of Conduct for each jurisdiction form part of this program. In general, Tatts Lotteries does not offer games that would:

- (a) create any continuous forms of play;
- (b) have a strong appeal to minors; or
- (c) be offensive or contrary to the public interest.

This Tatts Lotteries Responsible Gambling Code of Conduct NSW (**Code**) describes how we demonstrate this commitment in New South Wales.

3. Availability of the Code

A sign indicating the availability of the Code is on display in all Outlets.

A responsible gambling brochure, '*Have Fun & Play Responsibly*', indicating the availability of the Codes for each jurisdiction and providing a high level summary of the main tenets of all of the Codes in major community languages, is available for all customers in all Outlets.

A full copy of the Code is available for inspection in all Outlets upon request and also on the Websites

4. Responsible Gambling Message

Tatts Lotteries has a responsible gambling message, "**HAVE FUN & PLAY RESPONSIBLY**", which is displayed on all responsible gambling materials.

5. Gambling Information and Warnings

NSW Lotteries ensures the approved NSW Government gambling information and warning message of:

Think! About your choices
Call Gambling Help 1800 858 858
www.gamblinghelp.nsw.gov.au

appears on the following NSW Lotteries material:

- a) NSW Lotteries printed lottery entry forms and tickets with the exception of Instant Scratch tickets;
- b) NSW Lotteries How to Enter/Play leaflets/posters. These leaflets/posters must also contain information about the odds of winning a major prize in a lottery or if there are different prize divisions, the chances of winning a prize in each division;
- c) The Websites;
- d) Any NSW Lotteries written advertising published, or caused to be published by NSW Lotteries or their Retailers in a newspaper, magazine, poster or other printed document including internet advertisements;
- e) The "Have Fun and Play Responsibly" Tatts Lotteries Responsible Play brochure;
- f) The "Have Fun and Play Responsibly" Tatts Lotteries NSW Retailer Responsible Play sign.

The warning message also appears on the NSW Government approved 'player information brochure' and the NSW Government approved 'counselling signage poster' which are on display in NSW Lotteries Outlets.

6. Responsible Gambling Information

NSW Lotteries' Responsible Gambling Materials

All Outlets and the Websites **must** have responsible gambling information on display in a range of forms, including brochures and posters.

Materials are subject to change but current examples of responsible gambling materials include:

a) The '*Have Fun & Play Responsibly*' brochures which must be displayed and available for customers at all Outlets and online at the Websites. These brochures provide information on:

- how to gamble responsibly;
- how to make and keep a pre-commitment decision;
- the availability of gambling support services;
- the odds of winning;
- how to lodge a complaint for a suspected sale of lottery products to minors or for any other responsible play complaint; and
- contains the NSW Government approved gambling information and warning message of :

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Call Gambling Help 1800 858 858

www.gamblinghelp.nsw.gov.au

b) The '*Have Fun & Play Responsibly*' sign must be on display in all Outlets and online on the Websites. This sign includes information on:

- the prohibition of the sale of lottery products to minors and to intoxicated people;
- the availability of gambling support services;
- the Complaints Handling Charter;
- Tatts Lotteries responsible gambling financial transaction policy including the restrictions that apply to the payment of winnings over \$1000, the cashing of cheques, the provision of credit or the lending of money for the purposes of gambling;
- the availability of the NSW Lotteries Game Rules for inspection in the Outlet; and
- the NSW Government approved gambling information and warning message:

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www.gamblinghelp.nsw.gov.au

c) The NSW Lotteries Game Rules must be displayed in all Outlets or be available for inspection on request by customers at all Outlets and online at the Websites. The NSW Lotteries Game Rules provide information on the games and the percentage return to players.

- d) The NSW Lotteries 'How to Play' leaflets must be on display and available to customers in all Outlets and information on how to play the games must be available online at the Websites. The 'How to Play' leaflets provide information on each of the NSW Lotteries games and the odds of winning a major prize in those lottery games or if there are different prize divisions in the lottery games, the odds of winning a prize in each division. The 'How to Play' leaflets must also include the NSW Government approved gambling information and warning message:

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Call Gambling Help 1800 858 858

www.gamblinghelp.nsw.gov.au

- e) The Customer complaint Handling Charter which is available online at

www.nswlotteries.com.au

- f) The Websites must include the odds of winning a major prize in each of the NSW Lotteries lottery games or, if there are different prize divisions in the lottery games, the odds of winning a prize in each division. The Websites must also include the information contained in the NSW Government approved player information brochure. This information is provided via a link to the NSW Government website to the approved player information brochure. The Websites must contain the NSW government approved gambling information and warning message:

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Call Gambling Help 1800 858 858

www.gamblinghelp.nsw.gov.au

The materials described in Section 6 (a),(b) and (d) are available for re-order by the Retailer through the lottery terminal.

- g) Responsible Gambling banner text containing a responsible gambling message and contact information details for problem gambling support services will be electronically displayed on customer terminal screens in most Outlets at least four times per annum.
- h) NSW Lotteries online player self-exclusion information which is provided in the 'Guide to Buying Online' in the 'Buy Lotto' section of the website. This information directs online players who wish to self-exclude, to call Tatts Lotteries Responsible Play Liaison officers to suspend their online accounts for a minimum of 180 days. It also provides information to the customer on how to self-exclude themselves online, via the submission of an online self-exclusion request. For customers to get further help there is the National Gambling helpline number on the Self Exclusion Web Page and there is a link from the Self- Exclusion web page to the Responsible Play Program web page on the NSW Lotteries Website. The Responsible Play Program web page also displays the National Gambling Helpline number 1800 858 858, the Lottery Rules; the odds information and the 'How to Play' information for each game.

7. NSW Government Responsible Gambling Materials

- a) The NSW Government English Player Information brochure must be in a form approved by the Authority and must be on display in all outlets and must be made available to players.
- b) The NSW Government Counselling Signage poster must be in a form approved by the Authority and must be on display in all outlets.
- c) These NSW Government materials contain the gambling warning message and the Gambling Helpline number and NSW Government help website address. The player information brochure also contains information concerning the chances of winning a major prize in a public lottery.
- d) NSW Lotteries is obliged to supply Retailers with the above NSW Government materials for display in the Outlets.
- e) On request from a player, a Retailer must supply a NSW Government community language player information brochure as soon as practicable after being requested to do so. The brochures must be in a form approved by the Authority and obtained from the NSW Office Of Liquor, Gaming and Racing (NSW OLGR) via a request to the Tatts Lotteries Social Responsibility Manager on 07 3877 1119, who will organise the receipt of the brochure from NSW OLGR.
- f) The materials described in Section 7 (a) and (b), are available for re-order by the Retailer through the lottery terminal.

8. Gambling Product Information

Information on all gambling products must be available and accessible for customers on request in all Outlets. This information concerns the odds of winning and player information for each game:

- a) The NSW Lotteries Game Rules must be displayed in all Outlets or be available for inspection on request by customers at all Outlets and online at the Websites. The NSW Lotteries Game Rules provide information on the games and the percentage return to players.
- b) Outlets must also display 'How to Play' leaflets for each NSW Lotteries game which include information on how to play the games, and the odds of winning a major prize in those lottery games or, if there are different prize divisions in the lottery games, the odds of winning a prize in each division.
- c) Outlets must also display the 'Have Fun and Play Responsibly' brochures which include information on the odds of winning a first division prize or the odds of winning a prize for Tatts Lotteries games (some of which are NSW Lotteries games).
- d) The NSW Government English Player Information brochure must be on display and accessible to all players. These brochures contain information concerning the chances of winning a major prize in a public lottery.
- e) On request from a player, a retailer must supply a NSW Government Community Language Player Information brochure as soon as practicable after being requested to do so. The brochures must be in a form approved by the Authority and obtained from the NSW Office Of Liquor, Gaming and Racing (NSW OLGR) via a request to the Tatts Lotteries Social Responsibility Manager on 07 3877 1119, who will organise the receipt of the brochure from NSW OLGR. These brochures contain information concerning the chances of winning a major prize in a public lottery.

9. Customer Loyalty Scheme

Players Club is a membership scheme which adds security to members' lottery purchases and allows members to store their favourite numbers. NSW Lotteries tickets purchased by members are registered to the member's Players Club Card. NSW Lotteries stores members' contact information against the Players Club Card and pays prizes directly to the member if not claimed within a defined period.

NSW Lotteries does not actively have a schedule of defined rewards which are linked to expenditure. NSW Lotteries will communicate about upcoming events and offer members the ability to enter promotional draws including a monthly second chance draw using their Players Club Card and non-winning lottery tickets. The winners of any promotions conducted for Players Club are contacted by NSW Lotteries.

There is a membership program for NSW Lotteries Instant Scratch-its which allows members access to exclusive promotions, offers and activities. Members can access from time to time, second chance draws and promotional offers on certain instant scratch tickets bought in retail outlets via an online Scratch eClub. The membership scheme does not have a schedule of defined rewards and is not linked to expenditure on NSW Lotteries Instant Scratch-its.

Detailed information including the terms and conditions about the operation of the Scratch eClub program is made available at the time of joining. Membership is not available to minors.

10. Pre-commitment Strategy

NSW Lotteries encourages customers to set a limit according to their individual circumstances. Printed information is available at Outlets in the Have Fun and Play Responsibly brochure to assist customers to make a pre-commitment decision. Online customers are able to set themselves play limits. Deposit limits exist for customers using credit cards to deposit funds into their online account.

11. Interaction with Customers

Tatts Lotteries has designated Responsible Play Liaison Officers (RPOs) for all the states and territories in which they operate who are available during business hours (approximately 5am until 8pm Monday to Saturday and 5am until 2.30pm on Sunday, but subject to change). The RPOs can be contacted on the Tatts Lotteries Responsible Play number 1300 138 132.

NSW Lotteries Retail Territory Managers and Retailers are trained in the service of responsible gambling. Each Retailer receives comprehensive responsible gambling training prior to their commencement at an Outlet. Tatts Lotteries also produces responsible gambling training materials for the Retailer for the purposes of on-training members of their staff.

Tatts Lotteries has also trained 7 Eleven RPOs to handle responsible gambling queries during Tatts Lotteries out of hours (approximately 8pm until 5am Monday to Saturday and 2.30pm to 5am on Sunday but subject to change).

A person who approaches a staff member in an Outlet and asks for information about problem gambling services or indicates a problem with their gambling will be directed to the Retailer or Tatts Lotteries RPO for assistance.

On request the RPOs can:

- provide information and contact details for gambling related support services;
- remove players from the Players Club program and/or stop promotional letters or offers from personally being mailed to the player.

After deactivating their Players Club membership, no correspondence or promotional material is to be personally mailed to self excluded players from NSW Lotteries.

Players who are noticeably distressed from gambling will be provided with information detailing gambling support services.

For interpreter services regarding Responsible Play, customers will be advised to contact the RPLOs on 1300 138 132 for further information. If required the Retailer will assist the customer by contacting the RPLOs on the customer's behalf.

Tatts Lotteries and its Retailers value the protection of customers' privacy and all interaction with customers will be done with due respect for their privacy.

Tatts Lotteries, their Retailers and their staff, must not encourage a person to gamble beyond their means.

Gambling Helpline National Number: 1800 858 858

12. Publicity Concerning Prize Winners

The names, addresses and other details of winners and their families must be kept strictly confidential and must not be made available by NSW Lotteries or its contractors, suppliers or agents to any third party without the consent of the relevant winner.

No advertising or public relations will feature or make any reference whatsoever to actual named individual winners of NSW Lotteries without first obtaining the consent of that winner.

When requesting consent it will be made clear to the winner what will be involved in the advertising or public relations activity.

In the event that a winner subsequently decides that he/she does not wish to be featured in advertising or public relations, this request must be honoured as far as is reasonably possible, notwithstanding that approval had originally been given by the player.

NSW Lotteries can publish the venue or geographic location at which a prizewinning ticket was sold and the amount of a prize won.

13. Staff Gambling Policy

Tatts Lotteries has no restrictions on its staff or Retailers participating in the purchase of lottery products in Outlets.

If a Tatts Lotteries staff member, a Retailer or a member of their staff asks for information about problem gambling services or indicates a problem with their gambling, they will be directed to a Tatts Lotteries RPLO for assistance, with due respect for the privacy of the staff member or Retailer.

Tatts Lotteries provides responsible gambling training and material to all new staff members and new Retailers and provides updates on responsible gambling at regular network meetings.

14. Problem Gambling Support Services

NSW Lotteries is committed to maintaining strong linkages with problem gambling support services. Tatts Lotteries Social Responsibility Manager and the Tatts Executive General Manager, Community Relations, with the assistance of senior Retail Managers, are responsible for maintaining relationships with the local Gamblers Help support services through meetings or interactions throughout the year.

15. Customer Complaints

Tatts Lotteries has a Complaint Handling Charter for NSW Lotteries dealing with complaints about the operation of, or compliance with, the Code. The Complaint Handling Charter details the process for customer complaints. This charter is available online at www.nswlotteries.com.au

The 'Have Fun and Play Responsibly' Responsible Play sign and brochure, which are on display and available at all Outlets, advertises the location of the Complaint Handling Charter on the NSW Lotteries website.

A member of the public can make a complaint to NSW Lotteries in person, by telephone, letter, fax or email.

CONTACT DETAILS – NSW LOTTERIES

Phone: 131 868

Email: info@nswlotteries.com.au

Fax: (07) 3877 1140

Mail: Complaints at NSW Lotteries Locked Bag 7 COORPAROO DC QLD 4151

In person: NSW Lotteries
1 Figtree Drive Olympic Park Sydney NSW 2127

If a complaint is made in person or by telephone, the complainant may be asked to submit details of the complaint in writing.

The incident or complaint will be investigated within a reasonable timeframe and for written complaints, within 21 days.

For NSW complaints, Tatts Lotteries investigates, determines and implements a resolution for all complaints and informs the complainant and the subject of the complaint (if applicable) of Tatts Lotteries conclusion in relation to the complaint and the reason for that conclusion and also logs the details of the complaint and the outcome. If the matter is resolved, no further action is taken.

If the complainant requests a review of the decision, an internal independent review is conducted, which may include the following measures:

- all material in relation to the complaint is examined; and
- discussions may be held with the complainant, the subject of the complaint, and/or staff involved with the management of the complaint.

If the complainant requests a review of the internal decision, the matter is referred by Tatts Lotteries to a member of a panel of independent mediators for either a determination based on submitted paperwork or to arrange mediation if necessary. Costs of this process will be shared equally by Tatts Lotteries and the complainant.

Players 1st Program

In addition to the Complaint Handling Charter, NSW Lotteries has a Players 1st Program which is designed to ensure security of lottery purchases and prize claims. Measures that are covered in the program include: registering as a Players Card member; ticket security hints and tips; retailer

integrity procedures; Players 1st hotline and email; prize claim procedures; customer service standards; and reminders to players to check tickets carefully at time of purchase.

In particular, the Players 1st hotline of 1300 PLAYER (1300 752 937) is promoted to players for use if there is doubt about what to do with a major prize win or if the player has concerns about the way a lottery transaction has been handled. Any complaints received through this hotline will be investigated by NSW Lotteries.

16. Minors

Legislation prohibits persons under 18 years of age from purchasing lottery products. The Public Lotteries Act 1996 (NSW) also prohibits the entering of a lottery on behalf of a minor. The 'Have Fun and Play Responsibly' sign which notes the prohibition of minors participating in lotteries must be prominently displayed by Retailers in Outlets and must be included on the websites. Retailers are required to ask for verification of age where they are uncertain whether a customer is at least 18 years of age. If relevant verification cannot be produced, service must be refused. Retailers are also not permitted to pay prizes to minors or allow them to collect prizes on behalf of their parents, guardians or other adults.

NSW Lotteries online players are required to verify their identity and that they are over 18 years of age before their first withdrawal can be processed. NSW Lotteries requires that the player verifies the information they provided during registration.

17. The Gambling Environment

Tatts Lotteries and their Retailers provide a safe environment and discourage customers from engaging in extended gambling.

Customers who are intoxicated are not permitted to buy lottery entries.

Staff working in Outlets, or at NSW Lotteries or Tatts Lotteries Offices, are not to encourage lottery players to provide them with gifts or gratuities.

18. Financial Transactions

Tatts Lotteries and their Retailers do not provide credit or lend money for the purchase of lottery products. The purchase of lottery entries via credit cards and/or EFTPOS is an acceptable retail practice.

NSW Lotteries Retailers may accept cheques as payment for lottery purchases but this practice is not encouraged and is done so at their own risk. NSW Lotteries Retailers do not cash cheques including prize cheques in their capacity as a NSW Lotteries Retailer.

NSW Lotteries Head Office must pay the total amount of any prize winnings over \$1000 by cheque or EFT. Total prize money means the total amount of money payable to a person as a result of the person winning money in respect of a single entry in a NSW Lotteries lottery product (whether or not that entry relates to one or more than one, game in the lottery product).

For prize winnings \$1000 and under, payment must be made by Retailers in cash or by cheque, on approval by the customer, if the Retailer does not have sufficient cash funds to pay the total prize amount. There is no provision for Retailers to EFT prize winnings to customers.

Information on the financial transaction policy is on display at all Outlets on the 'Have Fun & Play Responsibly' sign.

19. Responsible Advertising and Promotions

NSW Lotteries ensures that its advertising and promotions for NSW which are prepared by Tatts Lotteries marketing staff:

- a) comply with the advertising code of ethics adopted by the Australian Association of National Advertisers;
- b) do not represent an irresponsible trading practice or portray actions that may seem socially irresponsible;
- c) do not show minors in advertising. No advertising (whether in terms of style, tone, content, medium, location or any other factors) should be directed at or likely to appeal primarily to persons under 18 years of age. No suggestion should be made in any advertising that anyone under the age of 18 can participate.
- d) are not false, misleading or deceptive or in contravention of a requirement of lotteries regulations;
- e) do not implicitly or explicitly misrepresent the probability of winning a prize or that winning will be a definite outcome of participation in a lottery;
- f) do not give the impression that buying lottery tickets is a reasonable strategy for financial attainment or will definitely improve a person's financial prospects;
- g) do not offend prevailing community standards and are in accordance with decency, dignity and good taste and in accordance with the Commercial Television Industry Code of Practice as in force at the time the lottery advertising is published;
- h) are not discriminatory nor appear to be patronising to any particular group;
- i) are not directed at or provided to excluded persons and are not targeted at vulnerable or disadvantaged groups where people may not have a capacity to fully understand the information, such as refugees or people with intellectual disabilities;
- j) do not include misleading statements about odds or prizes;
- k) do not publish or cause to be published anything which identifies customers who have won a prize without prior consent and do not violate the confidentiality of any information relating to, or the privacy of, players without the consent of the player;
- l) do not depict or promote the consumption of alcohol while buying a lottery product;
- m) do not encourage anyone to contravene a gaming law or any law;
- n) do not suggest that skill can influence games that are games of chance;
- o) do not encourage excessive or reckless playing;
- p) do not include an offer of free or discounted alcohol; and
- q) incorporate the NSW Government approved gambling warning message on NSW Lotteries print (including internet) advertising, POS posters or brochures (i.e. everything that is not Television or Radio media):

"Think! About your choices

Call Gambling Help 1800 858 858

www.gamblinghelp.nsw.gov.au;

Tatts Lotteries marketing staff also incorporate the Responsible Play Program's tagline, 'Have Fun & Play Responsibly' into prominent pieces of point-of-sale and other advertising and promotional material where appropriate.

A Responsible Gambling Checklist and guidelines are used by Tatts Lotteries staff in the preparation of marketing material to assist staff compliance for NSW Lotteries generated promotional material.

The NSW Lotteries Retailers are obliged to ensure their own advertising and promotional materials, where such materials relate to NSW Lotteries gambling products, comply with the same requirements as above. These requirements are advised to all Retailers in training.

The NSW Lotteries Retailers are also obliged to ensure their own advertising and promotional materials:

- a) are approved by NSW Lotteries; and
- b) incorporate the Tatts Lotteries Responsible Play Program's tagline, 'Have Fun & Play Responsibly' into prominent pieces of point-of-sale and other advertising and promotional material where appropriate.

20. Other Mandatory Elements for Inclusion in Advertising

All advertising material must feature:

- NSW Lotteries Logo – unless specifically agreed;
- other campaign specific information where required appropriate (e.g. prize level, date(s) of offer, etc.);
- Entry forms and how to play brochures must feature the responsible gaming message for NSW which is the Gambling Help message:

Think! About your choices
Call Gambling Help 1800 858 858
www.gamblinghelp.nsw.gov.au

21. Compliance by Advertising Agencies and Other Suppliers

All advertising agencies working on NSW Lotteries accounts, as well as suppliers of related services, are required to abide by the 'Responsible Advertising and Promotions' requirements and the 'Other Mandatory Elements for Inclusion In Advertising' as described in this Tatts Lotteries Responsible Gambling Code of Conduct – NSW. They must also maintain an awareness of the relevant rules and regulations.

Any breach of the Code is viewed seriously and could lead to termination of contracts.

Each time a new contract or other formal relationship is established with an agency or supplier which involves the promotion or advertising of lottery products, the key personnel involved in the business must be supplied with a copy of this Code in print or electronic format by the relevant NSW Lotteries manager responsible for managing the business relationship, and the agency or supplier must be fully briefed on all aspects of responsible gambling obligations.

Formal training may also be provided by NSW Lotteries where appropriate.

When new key personnel are allocated to the NSW Lotteries account, NSW Lotteries must be advised in writing, and the personnel must be provided with a copy of the Code within five working days by the relevant agency.

22. Advertising or Promotions by or with Third Parties

No advertising or promotion referring to NSW Lotteries developed by third parties may be published or broadcast without the approval of NSW Lotteries;

Where such advertising, co-promotion, sponsorship, joint merchandising, etc., is undertaken by or in conjunction with any third party or involves any non-lottery types of products or services, this Code must be complied with and particular care will be taken to ensure that the products, services or third party company or organisation do not detract from the quality image of NSW Lotteries or its retailer network.

Except in the clear case of a joint activity with a third party, NSW Lotteries must not endorse, or be perceived to be endorsing, other products, services or companies. Where these do appear, they must be incidental to the focus of the advertising.

23. Retail Compliance with the Code

NSW Lotteries monitors Retailers' compliance with the Code through regular retail outlet audits. The audit is conducted by Regional Territory Managers who visit each of the outlets as per their normal call cycle. As part of their call activities, a regular check is undertaken of compliance with a range of responsible gaming measures including: display of all required signs and information; incorporation of government messages about problem gambling counselling and referral services in locally produced point of sale material and advertising; ensuring no breaches such as sale to under 18's or provision of personal credit by agents for the purchase of lottery tickets; reinforcement of training messages on compliance issues. Based on the current call cycle, every Retailer is audited at least once a year.

24. Review of the Code

The Code is a dynamic document and will be reviewed annually to ensure it complies with legislation and any Ministerial Direction.

Feedback from Retail Territory Managers based on their agency performance appraisals, feedback from trainers and information received from customer feedback to the call centre will be used to inform the review. Areas needing improvement will be highlighted in a review report and put into an action plan for the following financial year by Tatts Lotteries' Social Responsibility Manager.