

Communication Direct Pty Ltd and Let's Talk Marketing Pty Ltd

Responsible Gambling Code of Conduct

1. Availability of the Responsible Gambling Code of Conduct

The Code is also available on the Communication Direct website at www.communicationdirect.com.au or by request to Geoff Moore, General Manager on 03 8414 5600.

2. Responsible Gambling Message

Communication Direct Pty Ltd (CD) and Let's Talk Marketing Pty Ltd (LTM) are committed to selling raffle tickets responsibly to support community and charitable organizations.

This message will be displayed on Communication Direct's website and on material developed by CD and LTM for the promotion and conduct of raffles on behalf of community and charitable organisations.

A responsible gambling message is available to any customers placed on hold prior to or during a telephone contact.

3. Responsible Gambling Information

Information about the following is also available on the Communication Direct website at www.communicationdirect.com.au or by request to Geoff Moore, General Manager, 03 8414 5600.

- how to gamble responsibly, e.g. decide before you buy how much you want to spend
- the availability of gambling support services
- restrictions that apply to the provision of credit or the lending of money by Communication Direct P/L for the purposes of purchasing raffle tickets

4. Gambling Product Information

The terms and conditions for the conduct of a raffle will be printed on the ticket and/or information material designed to promote the raffle, and the Communication Direct website at www.communicationdirect.com.au or by request to Geoff Moore, General Manager, 03 8414 5600.

This information will include how to enter and the odds of winning the stated prizes based on the total possible ticket sales.

CD and LTM run 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 any subsequent campaign.

5. Customer Loyalty Scheme Information

Communication Direct P/L does not offer a Customer Loyalty Scheme.



6. Interaction with Customers

CD and LTM telephone staff will assist customers who request it with information about help with a gambling problem.

This information will include referral details to a Gambler's Help telephone service and/or information materials prepared by Gambler's Help services.

In addition for customers who have indicated that they have a gambling problem or where a canvasser forms the view from the customer that a customer may be overextending themselves financially:

- Telephone canvassers will offer to end the call/call back later if the customer wishes to continue with their ticket purchase
- Provide a telephone number whereby credit card purchasers could amend or cancel their order (cooling off period)
- Where tickets are sold in person, suggest that the purchaser take a moment to reflect on whether they wish to purchase tickets/as many tickets
- Where tickets sold by mail an upper limit of 5 books will be issued to a customer to purchase/sell at any one time

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

7. Interaction with Staff

Staff are not permitted to purchase raffle tickets being sold by CD or LTM.

A nominated manager/supervisor of CD and LTM will assist a staff member who requests it, with information about help with a gambling problem. This information will include referral details to a Gambler's Help telephone service and/or information materials prepared by Gambler's Help services.

This will be done away from the general work area and in such a way as to protect the staff member's privacy.

Staff members who are displaying indicators of distress that may be related to problem gambling (not confined to raffle purchases) will be offered the above information and assistance.

8. Interaction with Problem Gambling Support Services

The General Manager or a senior staff member of CD or LTM will contact Gambler's Help services twice a year to obtain updated publications and any changes to contact details or available services.

This information will be communicated to staff, and made available for use with customers, as soon as practicable after it is received.



Let's Talk Marketing

9. Customer Complaints



Complaints may be made by telephone to 03 8414 5600 or by letter sent to:

General Manager
Communication Direct Pty Ltd
Level 1, 79 Maroondah Highway
Ringwood VIC 3134

The details of each complaint are entered into the Complaint Register with a record of the outcome of each complaint.

When complaints are received by telephone they are referred to the Operations Manager. The Operations Manager will endeavour to resolve the issue at this time.

When complaints are received by mail, we aim to respond to these letters within one business day of receipt. If we need to investigate the issue further, we aim to resolve it within five business days.

While the issue is being investigated, CD or LTM will provide updates on resolution progress.

If a customer is not satisfied with the resolution or the investigation of the issue, it will be escalated to the General Manager. The General Manager will deal with the customer personally to discuss the issue and the resolutions that have been offered.

If CD or LTM remains unable to resolve the complaint to the customer's satisfaction, the matter will be referred to an independent mediator, such as the Institute of Arbitrators and Mediators (www.iama.org.au) and costs will be equally shared between both parties.

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

10. Compliance with the prohibition on gambling by minors

CD and LTM will not target a promotion or sales campaign at minors and will not knowingly sell raffle tickets to minors. Staff will take reasonable steps to ascertain the age of the customer prior to the purchase of raffle tickets.

11. The Gambling Environment

CD and LTM will discourage repeatedly excessive purchase of tickets by customers.

To achieve this CD and LTM will:

- Set a limit on the quantum or value of tickets to be sold to an individual
- Check data base of regular ticket purchasers to detect a pattern of excessive purchase
- Not engage in hard/pressure sales techniques



CD and LTM will not cash customer's cheques or extend credit to customers to purchase raffle tickets

13. Responsible Advertising Promotions

Any advertising and promotions undertaken by CD or LTM in relation to a raffle will:

- Comply with the advertising code of ethics adopted by the Australian Association of National Advertisers
- Not be false or misleading or deceptive about odds, prizes or the chances of winning
- Have the consent of any person identified as winning a prize prior to publication
- Not be offensive or indecent in nature
- Not create an impression that entering a raffle is a reasonable strategy for financial betterment
- Not promote the consumption of alcohol while buying raffle tickets.

CD and LTM will incorporate the above standards into its advertising checklist and will assess all proposed advertising against these standards.

14. Processes and Structures to Support the Ongoing Implementation of the Code.

1. Responsible Gambling matters will be a standing item for Board and staff meetings.
2. A Responsible Gambling Officer will be identified from among senior staff to:
 - a. Handle more difficult customer contacts
 - b. Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers
 - c. Induct new staff members to ensure they are informed about responsible gambling issues and the Code
 - d. Handle responsible gambling issues raised by staff
 - e. Identify staff worthy of reward and recognition for their responsible gambling efforts
 - f. Liaise with Gambler's Help services to obtain relevant information, advice and training and make this available to staff and customers

15. Code Review Process

1. A review of the operation and effectiveness of this code will occur in June each year.
2. Input will be obtained from management and staff and a sample of patrons about the operation and effectiveness of the Code.

A report of the review will be provided to the VCGLR by 30th June each year.