

Appendix 6

MONEYCASINO LTD
POLICIES & PROCEDURES

Version	Date	Drafted/Reviewed by
1	November 2022	Debbie Bollard
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GAMBLING REGULATORY COMPLIANCE

Introduction

The Directors and Company acknowledge their obligations to uphold the licensing objectives set out in the Gambling Act 2005 and the requirement to comply with the Licensing Codes and Conditions of Practice (LCCPs) as amended from time to time. The Company will comply with any relevant social responsibility provision of a code of practice issued by the Gambling Commission.

If it became clear that the Company was unable to fulfil its responsibilities under the Operating Licence the Directors would notify the Gambling Commission immediately and comply with any requirements of the Gambling Commission

Licensing Objectives

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- Ensuring that gambling is conducted in a fair and open way.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

Licensing Conditions and Codes of Practice

The latest version of the LCCPs can be found online at

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/online>

Compliance with the *Social Responsibility Codes* is a condition of the Company's Operating Licence, and any breach may lead the Commission to review the with a view to suspension, revocation or the imposition of a financial penalty. This could also expose the Company to the risk of prosecution.

Ordinary Code Provisions do not have the status of Operator Licence conditions but set out good practice. The Company can adopt alternative approaches provides it considers the ordinary code provision and can demonstrate that an alternative approach is reasonable in the particular circumstances; or that by taking an alternative approach it is acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by the Company may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Information Requirements

The Directors and Company will work with the Gambling Commission in an open and cooperative way and will disclose anything that the Gambling Commission would reasonably need to be aware of in exercising its regulatory functions. They will disclose to the Commission anything that is likely to have a material impact on the Company's ability to conduct licensed activities compliantly.

The Company will provide the Gambling Commission with any information that it suspects may relate to the commission of an offence under the Gambling Act 2005, including an offence resulting

in a breach of a licence condition or a code of practice provision having the effect of a licence condition.

The Company will report any Key Events as listed in Licence Condition 15.2.1 to the Gambling Commission within 5 working days of becoming aware of the event.

The Company will report any other matters listed in Licence Condition 15.2.2 as soon as reasonably practicable.

The Company acknowledges its duty as set out in Licence Code 15.3.1 to, and will, provide the Gambling Commission with any information it requests in Annual Regulatory returns or otherwise relating to its operations including the type of gambling activities provided, the numbers of staff it employs, its policies in relation to, and the experience of, problem gambling.

ACCESS TO PREMISES POLICY

Rights of entry to premises by the Gambling Commission's Enforcement Officers, the Police or an Authorised Officer of the Local Authority are contained in Part 15 of the Gambling Act 2005 which deals with inspection.

- **Suspected Offence** - A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- **Inspection of Gambling** - A constable, enforcement officer or authorised person may enter premises if they reasonable suspect that unlawful facilities for gambling (other than private and non-commercial gaming) or better may be being provided, may be about to be provided or have been provided. **Inspection of Operating Licence Condition Compliance** - A constable or enforcement officer may enter premises that they reasonably believe to be used by the holder of an operating licence in connection with licensable activities, to determine whether the licensed activities are being carried out in accordance with the conditions of the operating licence.
- **Licensed Premises** - A constable, enforcement officer or authorised person may enter a premises where an application for a premises licence has been made to assess the likely effects of activity conducted under a premises licence.

The Company acknowledges its obligations to ensure that staff co-operate with any Gambling Commission Enforcement Officers and that they are made aware of those officers' rights of entry to premises to conduct their compliance function. Staff are trained as part of their induction process and in refresher training in the understanding of, and the strict adherence to this policy.

The Company will on request permit an enforcement officer to inspect any of its gambling equipment and documents as may be requested.

If a Gambling Commission Enforcement Officer presents themselves at any of the Company's premises a director will be informed immediately and will use all reasonable endeavours, to meet with the Enforcement Officer at the Premises and to provide any necessary assistance.

AML CRIME AND DISORDER POLICY & PROCEDURES

LICENCE REQUIREMENTS

Under LCCP 12.1.1 in order to prevent money laundering and terrorist financing, licensees must:

- Conduct an assessment of the risks of their business being used for money laundering or terrorist financing;
- Review the risk assessment at least annually;
- Have appropriate policies, procedures and controls in place to prevent money laundering; and
- Implement those policies effectively taking into account learning or guidelines published by the Gambling Commission.

The appropriate guidance from the Gambling Commission can be found at: <https://www.gamblingcommission.gov.uk/manual/duties-and-responsibilities-under-the-proceeds-of-crime-act-2002>

The Company is licensed to operate Amusement Arcades and supply gaming machines and is therefore not within the regulated sector under the Money Laundering (Information on the Payer) Regulations 2017 (as amended). However, the Company must comply with its obligations to prevent commission of offences under the Proceeds of Crime Act 2002 (POCA) and also comply with the LCCP.

MONEY LAUNDERING

Money laundering is a term referring to offences involving the proceeds of crime or terrorism funds. Criminals attempt to launder money by disguising the source and/or changing the form of the funds or moving them to a place where they are less likely to attract attention.

The following are acts of money laundering:

- Concealing, disguising, converting, transferring criminal property or removing from the UK (section 327 of the Proceeds of Crime Act (POCA) 2002).
- To enter into or become concerned in an arrangement which you know, or suspect will assist the acquisition, retention, use or control of criminal property or on behalf of another person (POCA section 328).
- Acquiring, using or possessing criminal property.

ANTI-MONEY LAUNDERING

Anti-money laundering (AML) is a term used to describe the legal controls that require financial institutions and other regulated entities to prevent, detect, and report money laundering activities.

An effective AML program requires:

- The criminalisation of money laundering with powers given to regulators and the police to investigate and prosecute;
- Financial institutions to identify their customers, establish risk-based controls, keep records and report suspicious activities;
- The ability to share information with other jurisdictions as appropriate.

REGULATION

Employees working in the remote gambling industry are required to make a report in respect of any information that comes to them in the course of their business:

- when they know
- when they suspect
- when they have reasonable grounds for knowing or suspecting that a person is engaged in money laundering or terrorist financing, including criminal spend.

These obligations are collectively referred to as grounds for knowledge or suspicion. The Company must be able to demonstrate, with supporting evidence, that a risk assessment is and has been undertaken prior to entering into business relationships with customers and that adequate customer due diligence is conducted in order to ensure that customers' transactions are consistent with the level of risk presented.

The Company must also be able to demonstrate the extent of ongoing monitoring which is conducted on a risk-sensitive basis and retained any records necessary to reflect this, with risk profiles being properly maintained. This policy identifies additional measures that will be applied to carry out risk monitoring and when it will be necessary to obtain a declaration as to the source of funds from customers in situations which present a high risk with the potential for money laundering.

The Company and its Directors are committed to ensuring that compliance is embedded in all aspects of the business.

AML RISK ASSESSMENT

COUNTRY/GEOGRAPHIC RISK

Risks

- Residents of some countries can pose an inherently elevated risk of money laundering; the Financial Action Task Force has identified several High-Risk Jurisdictions on their Black List and a number of countries that are under increased monitoring on their Grey List <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>
- Customers can present a higher risk as a result of their citizenship, business or residency.

Risk assessment

- There is a possibility that customers may originate from countries on the FAFT list.
- The majority of customers will be known to staff working in the premises through everyday customer interactions
- Staff are trained to be alert to any suspicious activity and to report suspicions to their line manager.
- Where the Company has suspicion that an unknown customer may come from a country on the Black List they will be asked to provide proof of residency and the Company will undertake further monitoring for any suspicious activity.
- Where the Company has suspicion that an unknown customer may originate from a country on the Grey List the Company may undertake further monitoring for any suspicious activity.

Risk assessment = LOW

CUSTOMER RISK

Risks

- Unknown or anonymous customers
- High spenders
- Disproportionate spenders
- Casual or regular customers
- Forged or stolen identities,
- From jurisdictions on the Black List or the Grey List or on sanctions lists.

Risk assessment

- The majority of customers will be known to staff through everyday customer interactions.
- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- Where there is any doubt about the identity of a customer, they will be asked to verify their identity against their passport or driving licence photo.

Risk assessment = LOW

TRANSACTION RISK (INCLUDING MEANS OF PAYMENT)

Risks

- Money used to bet/gamble may be the proceeds of crime.
- Cash may be used that is difficult to trace and is associated with criminal activity.
- Customers may deposit criminal proceeds into gaming machines and then withdraw the funds with no gambling activity.

Risk assessment

- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- The maximum stake on gaming machines is £2.
- Wins over £100 in value are paid out from the counter so staff can interact with the customer and identify any suspicious activity.

Risk assessment = LOW

PRODUCT RISK

Risks

- Some gambling products such as gaming machines, and automated ticket redemption machines can pose a higher risk of money laundering.

Risk assessment

- The Company offers low-stake gaming machines with a maximum stake of £2 and maximum prize of £500.
- Wins over £100 in value are paid out from the counter so staff can interact with the customer and identify any suspicious activity.

Risk assessment = MED.

RISK ASSESSMENT - OVERALL

- The Company has assessed its risk of being used to launder criminal proceeds to be **LOW/MED** overall.
- Its business is offering low stake gaming machines.

- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- Wins over £100 in value are paid out from the counter so staff can interact with the customer and identify any suspicious activity.

The Company assesses that its risk of money laundering is **LOW**.

The Company acknowledges that higher value gambling activity carries a higher risk of money laundering and staff are trained to be alert to any such activity and to report it to their line manager.

AML CRIME & DISORDER POLICY

This policy is based on the following principles and practises:

- The development of systems and controls that are appropriate for the business and comply with all legal and regulatory requirements;
- The assessment of any money laundering risks to the business at least annually and the adoption a risk-based approach that is flexible, effective, proportionate and cost effective;
- A commitment from, and responsibility resting with, the senior management;
- Regular assessment of the systems and controls in place;
- The maintenance of transactions records that meet the needs of law enforcement investigations tackling money laundering and terrorist financing;
- Initial and ongoing training for all relevant employees;
- Providing the nominated Money Laundering Reporting Officer (MLRO) with the resources and authority to operate objectively and independently.

RISK MANAGEMENT

The Company has a policy and procedures in place in relation to risk assessment and management, as required under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (the Regulations). This risk-based approach involves a number of discrete steps in assessing the most proportionate way to manage and mitigate the money laundering and terrorist financing risks:

- Identifying any money laundering and terrorist financing risks that are relevant to its business;
- Designing and implementing policies and procedures to manage and mitigate these assessed risks;
- Monitoring and improving the effective operation of these controls; and
- Recording what has been done, and why.

This risk-based approach focuses the effort where it is most needed and will have most impact. It requires the full commitment and support of senior management, and the active co-operation of all employees. The Company has conducted an assessment of its risk exposure to money laundering, which considers the threat, and its impact.

MLRO

The designated Money Laundering Reporting Officer (Cosmin Breje) takes responsibility for SARs in respect of the prevention and detection of money laundering, counter terrorism financing and the Company's obligations under the Proceeds of Crime Act 2000

The MLRO has responsibility for:

- Deciding whether to establish or continue a business relationship with a customer or supplier;
- Suspending or terminating a business relationship;
- Deciding whether the Company has any knowledge or suspicion of money laundering in relation to a customer's betting activity; and
- Submitting a Suspicious Activity Report (SAR) to the National Crime Agency (NCA) using [https://www.ukciu.gov.uk/\(q4ikyc551r24d1ir3kosbh55\)/saronline.aspx](https://www.ukciu.gov.uk/(q4ikyc551r24d1ir3kosbh55)/saronline.aspx)
- Seeking a defence (where appropriate); and
- Keeping a record of the decision-making process and all SARs submitted to the NCA.

The MLRO has the authority to act independently in carrying out their responsibilities and has access to sufficient resources to carry out their duties.

SUSPICIOUS ACTIVITY

Suspicious activity includes any suspicious transactions, or extreme customer profiles, and where stakes contradict the circumstances. Where the Company identifies a customer that requires additional risk monitoring it will conduct enhanced due diligence checks and may ask them to provide the following as evidence of identity:

- Passport or ID card.
- Utility bill.
- Bank statement.
- Other proof of identity.

Enhanced Due Diligence Checks are based on a customers' profile and the risk they pose to the Company's business. Where it is determined that a customer may be a risk the Company will conduct risk monitoring which will include checks of the customer's occupation and whether its comparable to the level of customer spending.

SUSPICIOUS ACTIVITY REPORTS (SARS)

The law imposes a duty on businesses to make a Suspicious Activity Report (SAR) about any actual or suspected money laundering or terrorist funding. Any employee who has any information that comes to them in the course of working for the Company that they know, suspect, or have reasonable grounds to know or suspect a money laundering activity is occurring should report their suspicions promptly to the MLRO using the form below. Any employee failing to do so, will be subject to disciplinary action and is liable to criminal prosecution.

No further enquiries should be made about the suspected money laundering after reporting to the MLRO and no further steps in any transaction relating to the suspected money laundering should be made without authorisation from the MLRO.

An employee must not, under any circumstances, disclose or discuss any AML concern with the person or persons subject to an investigation, or any other person for that matter. Disclosure (also known as "tipping off") is strictly prohibited and carries with it serious legal penalties.

EMPLOYEES

The Directors are fully committed to and responsible for the implementation of this policy. They understand their individual personal liability for consenting to or contributing to the commission of offences under the Regulations, or where such offence is attributable to any neglect on their part.

Staff training

All staff will receive training on their obligations to report any knowledge or suspicions of money laundering to the MLRO and are aware of the procedures in place for doing so. Employees will receive training on how to follow Company procedures for:

- Client due diligence
- reporting suspicious activity to the MLRO.

RECORD KEEPING

The Company will ensure that there is an audit trail to assist in any financial investigation by a law enforcement body. Its record keeping policy and procedure covers records in the following areas:

- Details of how compliance has been monitored by the MLRO;
- Information not acted upon by the MLRO including an explanation as to why no further action was taken;
- Customer identification and verification information;
- Supporting records in respect of business relationships or occasional transactions;
- Employee training records;
- Internal and external SARs;
- Contact between the MLRO and police or the NCA, including records connected to appropriate consent.

OFFENCES

All employees are made aware of their risk of committing the following related offences.

- Failing to report suspicious activity under POCA and the Terrorism Act
- Failing to make a disclosure to the MLRO as soon as they are in receipt of information giving rise to the knowledge or suspicion.
- Failing, as the MLRO to make a disclosure to NCA of information giving rise to the knowledge or suspicion.
- Disclosing information that a SAR has been submitted and that is likely to prejudice an investigation,
- Disclosing information that an investigation into allegations that an offence under POCA or the Terrorism Act has been committed, and that is likely to prejudice the investigation.
- Falsifying, concealing, destroying, or disposing of any documents that re relevant to an investigation into an offence under POCA or the Terrorism Act

VETTING PROCEDURES FOR NEW EMPLOYEES

The Company undertakes a number of vetting procedures when staff are employed through proper identification checks and verifies the identity and credentials of employees using independent references. It will also seek to verify any further personal information or background information.

PROTECTING EQUIPMENT FROM INTERNAL CRIME AND CRIMINAL MISUSE

The Company understands that a keyway to combat fraud is to first identify where its most valuable assets are. Processes and controls have been built into the routine business of the Company to minimise the risk of any of the gaming machines being misused.

ENSURING OTHER COMPANIES ARE TRUSTWORTHY AND REPUTABLE

The Company is committed to promoting strong principles of business and professional ethics at every level.

All new suppliers will be subject to a rigorous approvals process and all information supplied by them will be verified and assessed to consider the risks associated with the supplier.

The company also ensures that any third parties it contracts with understand the compliance obligations under the relevant customer jurisdictions.

RESPONSIBILITIES UNDER THE PROCEEDS OF CRIME ACT (POCA)

The Company is fully aware of its obligations set out in the Proceeds of Crime Act 2002 and has appropriate policies and procedures in place.

INTERNAL RECORD KEEPING

- Records of all customer transactions will be retained for a minimum of 6 years after the transaction has taken place.
- Records of customer details, regardless of their value state or open/blocked status, will be kept for a minimum of 6 years after the relationship with the customer was terminated.
- Records of money laundering investigations and suspicious activity reports will be kept for 6 years after the investigation was completed.

FURTHER INFORMATION

Further information can be obtained from the following sources:

- National Crime Agency (NCA) - Suspicious Activity Reports (SARs):
<http://www.nationalcrimeagency.gov.uk/contact-us/reporting-suspicious-activity-sar>
- National Crime Agency (NCA) – Suspicious Activity Report (SAR) Online System
[https://www.ukciu.gov.uk/\(ero0v5550ikzu355oj4qvbiz\)/saronline.aspx](https://www.ukciu.gov.uk/(ero0v5550ikzu355oj4qvbiz)/saronline.aspx)
- National Crime Agency (NCA) - Guidance on submitting better quality Suspicious Activity Reports (SARs)
<http://nationalcrimeagency.gov.uk/publications/732-guidance-on-submitting-better-quality-sars/file>
- UKFIU guidance of the revised glossary codes and the reporting routes
<http://www.nationalcrimeagency.gov.uk/publications/725-sar-glossary-code-and-reporting-routes/file>
- Money Laundering Regulations: report suspicious activities:
<https://www.gov.uk/guidance/money-laundering-regulations-report-suspicious-activities>
- Gambling Commission - latest anti-money laundering news:
 - <http://www.gamblingcommission.gov.uk/Gambling-sectors/AML/Latest-anti-money-laundering-news.aspx>

For completion by the employee suspicious of activity

CONFIDENTIAL

From: _____

[insert name of employee]

Details of suspected offence:

<p>Names(s) and address(es) of person(s) involved: [if a company/public body please include details of nature of business]</p>
<p>Nature, value and timing of activity involved: [Please include full details e.g., what, when, where, how. Continue on a separate sheet if necessary]</p>
<p>Nature of suspicions regarding such activity: [Please continue on a separate sheet if necessary]</p>

Has any investigation been undertaken (as far as you are aware)? (Please tick the relevant box)

Yes No

If yes, please include details below:

Have you discussed your suspicions with anyone else?

(Please tick the relevant box) Yes No

If yes, please specify below, explaining why such discussion was necessary:

Signed: _____ **Dated:** _____

Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a tipping off offence, which carries a maximum penalty of five years' imprisonment.

For completion by the Money Laundering Reporting Officer (MLRO)

THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE MLRO

Date report received: _____

Date receipt of report acknowledged: _____

CONSIDERATION OF DISCLOSURE:

Action plan:

OUTCOME OF CONSIDERATION OF DISCLOSURE:

Are there reasonable grounds for suspecting money laundering activity?

If there are reasonable grounds for suspicion, will a report be made to NCA? [Please tick the relevant box] Yes No

If yes, please confirm date of report to NCA: _____ and complete the box below:

Details of liaison with NCA regarding the report:

Notice period: _____ to _____

Moratorium Period: _____ to _____

Is consent required from NCA to any ongoing or imminent transactions which would otherwise be prohibited acts? [Please tick the relevant box] Yes No

If yes, please confirm full details in the box below:

Date consent received from NCA: _____

Date consent given by you to employee: _____

If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to NCA, please set out below the reason(s) for non-disclosure:

[Please set out any reasonable excuse for non-disclosure]

Date consent given by you to employee for any prohibited act transactions to proceed:

Other relevant information:

Signed: _____

Dated: _____

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS

PROTECTION OF BUSINESS FROM BEING A SOURCE OF CRIME OR DISORDER

Credit & Money lending

The Company does not provide credit in connection with gambling nor participate in, arrange, permit, or knowingly facilitate the giving of credit in connection with gambling. Staff are trained to be alert to and to prevent collusion between customers. Disciplinary action will be taken against any member of staff involved.

The Company does not permit customers to lend money to one another and staff are trained to be alert to and identify any attempts and to report instances of substantial lending to a director. Customers will be asked to cease the practice and in certain circumstances they may be excluded from the premises if the behaviour continues.

Internal crime

The Company acknowledges that there is a risk of internal crime in the form of theft or money laundering by employees. Although this is assessed as being low, to mitigate the risk, the Company has adopted the following policy.

- The Premises are constantly monitored by CCTV which is recorded and available to download and review at any time.
- Only senior management are responsible for emptying and refloating the machines and which is conducted on a weekly basis at which time meter readings are taken and recorded; these are then checked to ensure that the same correspond.
- Any cash is kept stored securely in the safe in the office together with the keys to all the gaming machines with access by senior management only.
- Staff and their family are not permitted to use the gaming machines or electronic bingo terminals in its premises.

The Company can make the following gaming machines available for use in its Premises: -

- Category B3– max stake £2 max prize £500
- Category B4 – max stake £2 max prize £400
- Category C – max stake £1 max prize £100
- Category D – max stake 10p max prize £5

The Company will ensure that on its Premises it only operates 1 category B3/4 machine for every 4 category C/D machine unless it has premises with grandfather rights when it can operate a maximum of 4 category B3/4 machines. Where applicable, to maintain the 20% rule staff are trained to switch off a category B3/4 machine if a category C/D machine becomes unserviceable.

External Crime

The Company maintains an asset register recording:

- Details of all its gaming machines including serial numbers
- The location of each gaming machine and the relevant authorisation for its operations
- Details of any maintenance
- Details of disposal

The Company ensures that all gaming machines have:

- Independent metering to monitor activity.
- Coin and note acceptors that reduce the risk of counterfeit monies being used in the machines.
- Security locks with access to keys are limited to senior management only.
- Alarms and programs designed to shut the machine down in the event of an attempt tamper with them.

The Company audits transactions and accounts and makes regular checks for any unusual or suspicious activities.

The Company uses CCTV and has staff monitoring its equipment to prevent crime and criminal misuse.

The Company conducts due diligence checks on companies it deals with to ensure they are trustworthy and reputable and comply with any industry regulations and standards; this includes where appropriate that a supplier holds a valid Operating Licence. If there are any concerns about the conduct of a third party that the Company does business with it will, where appropriate, terminate any contract immediately.

The Company only uses gaming equipment supplied by companies that hold Operating Licences and regularly checks to ensure that the equipment complies with the Gambling Commission's technical standards.

ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY

The Company recognises its responsibility and obligations to ensure that the gambling facilities provided are operated in a fair and open way as is required by the licensing objectives and the LCCPs.

The Company offers gambling on fair and open terms; none of the terms on which gambling is offered are unfair terms within the meaning of the Consumer Rights Act 2015 and, where applicable, meets the reasonableness test under the Unfair Contracts Act 1977. Terms of play are benchmarked against these legal requirements.

Staff are trained on induction, that it is essential that the Company is seen to be operating in a fair and open way and that any queries should be immediately referred to the management. Staff are trained on how to deal with the complaints, and which includes logging all complaints in the log at the Premises. All records and reports, including the outcome of each dispute, are submitted annually to the Gambling Commission.

The Terms and Conditions of use of the facilities in Premises are clearly displayed at the Premises and include details of how to self-exclude and make a complaint. Paper copies of the terms and conditions and the complaints procedures are made available for customers to take away. Any changes will be notified to customers through additional signage prior to any change taking place.

The Company will ensure that it carries sufficient float in its safe on its Premises to cover all gambling transactions and financial obligations.

The Company acknowledges its responsibility for third parties that it contracts with linked to its licensed activities and will ensure that the terms of any such contracts: -

- require a third party to act in accordance with the LCCPs applicable to any activities conducted on behalf of the Company.
- require a third party to provide all information that the Company may need to comply with its information reporting and other obligations to the Gambling Commission
- permit the Company to terminate the contract if in its reasonable opinion a third party is in breach of contract particularly relating to terms pertaining to the LCCPs and licensing objectives.

TECHNICAL STANDARDS

Gaming Machine Technical Standards

LCCP 2.3.1 requires Operators to comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

The Gambling Commission's technical standards can be found at:

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/gaming-machine-technical-standards>

The Company acknowledges that its Operating Licence permits it to supply the following gaming machines to customers:-

- Cat B2 - max stake £2 max prize £500 to Casinos & Betting shops
- Cat B3 – max stake £2 max prize £500 to the above Bingo sites and AGCs
- Cat B3A – max stake 32 max prize £500 to members clubs etc
- Cat B4 – max stake £2 max prize £400 to all the above
- Cat C – max stake £1 max prize £100 to all the above FECs, pubs and commercial clubs
- Cat D AWP – max stake 10p max prize £5 to all above & uFECs
- Cat D non money - max stake 30p max prize value £8 to all above
- Cat D Prize – max stake £1 max prize value £50 to all above
- Cat D crane – max stake 10p max prize £8 to all above
- Cat D combined money & non-money max stake 20p max prize £20 to all above
- Cat D coin pushers and penny falls to all of the above

Gaming machines operated and supplied by the Company are either manufactured or supplied by Operators licensed by the Gambling Commission. The Company will, where appropriate, seek assurances from its suppliers that the gaming machines and parts supplied comply with the latest technical standards.

Gaming machines operated and supplied by the Company that are manufactured after September 2007 are fully compliant with the Gambling Commission's technical standards.

Gaming machines operated and supplied by the Company that are manufactured after September 2007 contain meters which record information on the games played and this information will be the basis for dispute resolution.

Gaming machines operated and supplied by the Company declare if they are 'random' or 'compensating'.

- If it is a random machine it will state on the machine that 'This machine is random'
- If it is a compensating machine it will state on the machine that 'this game is compensated and may be influenced by previous play'
- If it is a compensating machine which has a feature which may invite a player to make a choice which may offer a low chance of success (e.g. a Hi/Low or gamble button) the machine will state 'this game is compensated and may be influenced by previous play and offer the player a choice where there is little chance of success'.

Gaming machines operated and supplied by the Company display the percentage payout. This is calculated over a very long run, normally 100,000 plays.

- If the game does not depend on player strategy the machine will display the following notice 'this machine has an average percentage payout of at least [insert value] %'.
- If the payout depends on player strategy the machine will state 'the return to player based on best strategy is [insert value] %'
- If the payout, for example of a feature, does not reflect the true odds the machine will display the following message 'the outcome of any game of feature is not necessarily that shown by the odds displayed'.

Gaming machines operated and supplied by the Company state whether a malfunction will either void a game or voids all pay-outs and games.

Gaming machines operated and supplied by the Company state when a machine has a minimum payout level and will also state if it is not possible to have certain winning combinations available in every game.

MARKETING POLICY

Where the Company offers any customer or potential customer an incentive or reward it will ensure that the scheme makes clear:

- the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
- that neither the receipt nor the value or amount of the benefit is dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered;
- that if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases;

The Company will ensure that all marketing is undertaken in a socially responsible manner and complies with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable.

The Company will also ensure that any marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations; that all significant conditions which apply to any marketing incentives are provided transparently and prominently to consumers and that significant conditions are displayed at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive. Where limitations of space make this impossible information about the significant conditions will be included to the extent that it is possible to do so, and the advertising will clearly indicate that significant conditions apply with a link to a webpage where the significant conditions are displayed in full. Such terms will be made available for the full duration of the promotion.

The Company will not send direct electronic marketing to consumers without their informed and specific consent and will cease sending such marketing if consent is withdrawn.

COMPLAINTS AND DISPUTES POLICY

The Company's complaints policy and procedures set out in clear and simple terms how a customer can make a formal complaint to the Company and paper copies are available to take away.

If the complaint cannot be resolved to the satisfaction of the customer, the dispute will be referred to Pegasus ADR for ADR. No charge will be made to the customer for the referral.

A record of each dispute and the outcome are retained and recorded on the Operator's annual regulatory return.

A copy of the outcome of any dispute referred to ADR will be sent to the Gambling Commission

The Operator will regularly review and update where necessary its complaints policy and procedure.

Complaints And Player Dispute Resolution

Under SR Code provision 6.1.1 licensees must:

- put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner. The services of any such ADR entity must be free of charge to the customer.
- not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- Have complaints handling policies and procedures that include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- keep records of customer complaints and disputes and make them available to the Commission on request.

Investigating A Customer Complaint

Where a customer raises a complaint about the use of a gambling product provided by the Company it will invoke its complaints procedure as follows: -

- In the first instance the member of staff receiving the complaint will assess whether it can be resolved immediately without further intervention from the Company and the matter will be recorded in the Company's complaints' log - **Stage 1**
- If a member of staff is unable to resolve the matter immediately the matter will be referred to the Manager who will try to resolve it - **Stage 2**
- Where the Manager is unable to resolve the matter within 48 hours one of the Directors will

review the complaint and provide an acknowledgement to the customer within 3 days, by any reasonable communication method requested - **Stage 3**

- If the complaint cannot be resolved to both parties' satisfaction within 8 weeks, the customer will be advised to refer the complaint to PEGASUS ADR Service and provided with contact details
- The Company will provide Pegasus ADR Service with any additional information it requires to investigate the complaint within 10 working days of a request,
- A record of the referral and its outcome will be reported to the Gambling Commission.

The Company will ensure that:

- Its terms and conditions include information about how to make a complaint;
- Information about how to make a complaint is readily accessible to customers and in a paper format that can be taken away;
- The information includes: -
 - details of how to make a complaint and the contact details of the person who will handle the complaint;
 - Pegasus ADR Service's contact details for referring any disputes that cannot be resolved within 8 weeks by the Company;
- Customers are provided with a copy of the complaints policy and procedure on request or when making a complaint;
- All complaints are handled in accordance with the procedure;
- A record of all complaints is kept in its complaints log and a copy of the outcome and any decision of a referral to Pegasus ADR Service
- Its complaints policy and procedure are implemented with effective staff training, kept under review to ensure that they remain effective and comply with the requirements of LCCP 6.1.1 and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- It notifies the Gambling Commission about any change to its ADR provider.

MONEYCASINO LTD - COMPLAINTS & PLAYER DISPUTE RESOLUTION CUSTOMER INFORMATION

Moneycasino Ltd tries to provide a high-quality service to its customers and members of staff are trained on how to deal with complaints at the initial stage. However, if you believe that things have gone wrong, and your complaint was not resolved to your satisfaction then please let us know as we take such reports seriously. We will review your complaint and will be dealt with by:

Cosmin Breje who is a director
 Email Address: moneykingcasino@gmail.com
 Tel: 07476483783

How to make a complaint

- Complaints, are dealt with confidentially, and should be submitted by letter or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible and any other relevant information to assist us in the investigative process.
- Complaints should be raised within 6 months of the incident.

What happens next?

We will acknowledge receipt of your complaint in writing within 3 days. We will investigate and provide a full explanation of what we have done within 8 weeks of receiving a complaint. If this is not possible, for example because of a delay in you providing additional information we have requested, we will give a date by which a full response can be expected, and which will only take into account any such delays. Should your complaint not be resolved between us we will provide you with a 'deadlock' or final outcome letter that you will need to submit if you go to Alternative Dispute Resolution (ADR).

If you are not satisfied with our response

If you are still not satisfied with our response to the complaint, you may consider contacting Pegasus ADR Service, the ADR entity this company is registered with, and request that the matter be reviewed. You should submit all previous correspondence relating to your complaint, including the 'deadlock' letter referred to above.

Pegasus ADR Service will acknowledge receipt of your correspondence without undue delay and, after a review, inform you of its findings and recommendation usually within a maximum of 90 days. The review process is thorough and based upon the information that both parties and other independent sources provide.

Pegasus ADR Service's contact details are as follows:

- Email Address: enqs@pegasusadrservice.org.uk
- Website: <http://www.pegasusadrservice.org.uk/>
- Telephone: 01903 873785
- Postal Address: Pegasus ADR Service, 29-30 Ely Place, London, EC1N 6TD

It is recommended that you visit Pegasus ADR Service's website (as above) so that you are fully aware of the procedural rules and other related information

<http://www.pegasusadrservice.org.uk/HowWeOperate/ProceduralRules>

Complaint Form - CUSTOMER

Name:

Address:

.....

Postcode

Daytime Telephone No.....

E-mail address:

Signature: Date:

Is this an initial complaint or a follow up to a previous incident?

.....

.....

.....

Name of staff member that you initially raised your complaint with:

.....

Date of Incident:

Time of Incident:

A clear and comprehensive account of the complaint and what you are seeking as redress to resolve the matter:

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Please use continuation sheet(s) if required.

Signed..... (Complainant)

Date:

For Office Use Only

Director dealing with complaint:

Complaint Acknowledged (Y/N): Date:

Details of action to resolve taken by Company:

.....
.....
.....

If complaint still unresolved by Company

Complainant referred to ADR Entity (Y/N); Date.....

.....

Company Complaint Policy & Procedure Document given to Complainant (Y/N): Date.....

PROTECTION OF CHILDREN AND VULNERABLE PEOPLE POLICY

The Company recognises its responsibility and obligation to protect children and other vulnerable persons from being harmed or exploited by gambling as is required by the licensing objectives and the LCCPs.

Access To Gambling by Children and Young Persons

Licence Requirements

- Under s.46 Gambling Act 2005 it is an offence to permit a person under 18 to gamble.
- Under SR Code 3.2.3 licensees must:
 - Have and put into effect policies and procedures designed to prevent underage gambling.
 - Policies must include verifying the age of a customer.
 - Warn customers that underage gambling is an offence.
- Under SR Code provision 3.2.3 policies must also include:
 - checking the age of apparently underage customers
 - refusing entry to an AGC to anyone unable to produce an acceptable form of identification.
 - taking action when there are unlawful attempts to enter the adult-only areas.

POLICY AND PROCEDURE TO PREVENT UNDERAGE GAMBLING

All the Company promotional material makes it clear that under 18's are not permitted to enter its Premises.

The Company has a think 25 policy, and anyone entering its Premises that is suspected of being underage or believed to be under 25 is asked to produce valid photographic ID as proof of age which includes their date of birth and has no visible signs of tampering or reproduction. The Company will accept the following as evidence of proof of age:

- A passport; or
- A driving licence; or
- An Armed Forces identity card

Anyone found to be or unable to prove their age will be asked to leave the Premises or refused admission. Forged ID may be retained and handed to the police.

Staff are trained as part of their induction that they are under no circumstances to permit access to Premises by anyone who appears to be under the age of 25 and who cannot prove that they are over the age of 18. Notices are displayed at the entry to the Premises stating that no one under the age of 18 is permitted to enter or gamble.

The Company ensures that it does not offer gambling in a style that is intended to or likely to appeal to anyone under 18.

If a person under 18 repeatedly attempts to gamble at Company premises staff will offer that person information on problem gambling and issue an oral warning that further attempts will be

reported to the police. If the said person continues to try to enter the premises for the purpose of gambling the incident will be reported to the police, recorded in the incident log, and recorded in the Company's annual regulatory return.

If the Company identifies an adult who is complicit in encouraging or assisting someone under the age of 18 to enter and gamble in the premises a director will issue a warning and may consider excluding the adult from Company premises on a temporary or permanent basis.

An entry of any incident will be recorded in the incident log kept at the Premises and reported to the Gambling Commission on an annual basis.

The Company participates in a collective test purchasing scheme as part of its underage gambling prevention strategy with testing undertaken a minimum of once a year. The results of any test purchase will be recorded in the Company's logs as 'challenge before gambling activity', 'challenge during gambling activity', 'challenge after gambling activity', or 'unchallenged' and reported to the Gambling Commission. Where a premises fails a test purchase a further test purchase will be arranged and the results recorded.

Employment of children and young people

- Under s.51 of the Gambling Act 2005 it is an offence to employ anyone under 18 to provide facilities for gambling
- Under s.54 of the Gambling Act 2005 it is an offence to employ anyone under 18 to work on gaming machines that are sited in gambling premises
- Under s.55 it is an offence to employ anyone under 18 in an AGC unless closed
- Under Ordinary Code Provision 3.6.5 Licensees should have policies and procedures in effect designed to ensure that
 - Children and young people are not asked to provide facilities for gambling
 - All staff are instructed on the laws relating to access to gambling by children and young people

The Operator does not employ anyone under the age of 18 to work in its Premises. All staff have been trained about the laws relating to access to gambling by anyone under the age of 18 and which forms part of the induction training for all staff. It is strict Company policy that no gambling facilities are made available for use at Operator Premises if anyone under the age of 18 is working on the premises outside the hours when the premises are open for business.

SOCIAL RESPONSIBILITY POLICY AND PROCEDURES

Licence Requirements

- Under SR Code 3.1.1 licensees must:
 - Have and put into effect policies and procedures to promote socially responsible gambling;
 - Make an annual financial contribution to organisations to prevent and treat gambling related harms.
- Under SR Code 3.3.1 licensees must:
 - Make information readily available to customers on how to gamble responsibly and how to access information about problem gambling (e.g., monitoring or controlling gambling by duration or money spent, timers, self-exclusion options or further advice or information)
- Under SR Code 3.4.1 licensees must:
 - Interact with customers by (a) identifying customers who may be at risk or experiencing gambling harm (b) interacting with those customers and (c) understanding the impact of the interaction;
 - Take into account the Commission’s guidance on customer interaction <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators?msclkid=8e1bb2c1b4f411ec9bf242e2b502fe58>
- Under SR Code 3.5.1 licensees must:
 - Have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
 - Signpost individuals that self-exclude to counselling and support services.
- Under SR Code 3.5.6 licensees must:
 - Offer customers entering into a self-exclusion agreement at their Premises the ability to self-exclude from other similar local Premises operated by other licensees, by participating in a multi-operator self-exclusion schemes.

SR Triggers

The Company will use the following trigger points that it can monitor to identify those at risk of problem gambling: -

- An increase in the time spent gambling;
- An increase in the amount of money spent on gambling;
- Chasing losses;
- Complaints made by the customer about not winning or talking about the negative impact of their gambling;
- Signs of distress, agitation or other changes that might indicate that gambling is having a negative impact on the customers wellbeing;
- Threatening self-harm or suicide;
- A customer’s known vulnerability.

SR Procedures

The Company makes an annual financial contribution to an organisation approved by the Gambling Commission to prevent and treat gambling related harms. A decision as to the recipient is made on an annual basis.

As a result of the triggers set out above, where the Company becomes aware that a customer may be at risk of problem gambling, staff will provide the customer with responsible gambling information including the option to have a time-out from gambling or to self-exclude, or other options such as GAMSTOP.

The Company's procedure includes staff monitoring customer activity and interacting early and quickly to minimise the risk of customers experiencing harm associated with gambling. This takes into account the following 3 key outcomes:

- **Identifying** anyone who appears to be gambling beyond their means or displays behaviour such as agitation distress intimidation or aggression that may indicate problem gambling. Staff are trained to know the
- **Interacting** with anyone displaying signs of problem gambling by first asking them if they are open to a discussion about their behaviour and offering the following:
 - Taking a break from gambling;
 - Setting a limit on the time spent gambling;
 - Setting a limit on the amount that they spend on gambling;
 - Suggesting they play on a lower stake machine;
 - Self-exclusion;
 - Stay in Control Leaflet';
 - The use of a play diary to monitor their gambling;
 - Use of a Gambling Management App such as Gamblewise and Playright;
 - Information on how to contact to Gamcare for further help;
 - Taking a 'Time Out'.
- **Evaluating** the outcome of the interaction by monitoring the customer's behaviour/gambling activity to see if the advice has been followed and whether there has been a positive change. This should normally be done monthly and after a self-excluder opts to start gambling again. Where there are any further concerns about irresponsible gambling (even if triggers are not hit) further interaction will take place.

The Company acknowledges that staff have an important role in reducing the risk of customers suffering harm associated with gambling. The Company's training includes providing staff with the necessary tools, skills, and support to monitor customer activity and behaviour and interact at the earliest opportunity. Staff are trained to know regular customers' gambling habits and to recognise any changes that might indicate a problem. Staff are also trained to observe new customers for any signs of problem gambling.

The Company recognises that customers should be always protected and monitors footfall to ensure that adequate staffing is available to cover busier periods.

Record Keeping

The Company will maintain records of all customer interactions through its paper/electronic logs, including details of when an interaction was considered and ruled out and if an interaction took place later. Details will include: -

- the behaviour or activity before the interaction;
- the change in behaviour or prompt for the interaction
- what form the interaction took including any advice or suggestions;
- the outcome of the interaction.

Customers will be encouraged to provide their name and any other information considered necessary to provide further help and support and identify previous interactions. Personal data held by the Company will be in accordance with the requirements of the Data Protection Act 2018.

Training

Staff will receive training on the Company's Social Responsibility Policy and Procedures on induction and then at least annually on how to identify customers at risk, how to interact with customers, depending on the circumstances and to evaluate whether the interaction has been effective. Training will either be provided in-house by senior management.

Staff will be monitored to ensure that they have understood the training and implemented the procedures. Additional training and remedial training will be provided when considered necessary.

Responsible Gambling Information

The Company provides information to its customers through prominently posters and leaflets, on how to gamble responsibly including how to monitor and control gambling such as: -

- restricting the amount of time spent gambling;
- restricting the amount of money they can spend;
- self-exclusion.

The Company provides information to its customers through prominently posters and leaflets, on how to access further help and advice for problem gambling. The information is: -

- displayed in all places where gambling facilities are provided and adjacent to any ATMs;
- available in a form that can be taken away;
- located where customers can obtain it discreetly;

Self-exclusion

The Company understands that whilst most customers can enjoy and control their gambling, it has a duty of care to those who cannot. The Company therefore provides a self-exclusion facility for customers on request.

Self-exclusion is a last resort for customers looking to address their needs around problem gambling. Staff will engage in the customer interaction process where it may be deemed necessary to self-exclude. Sufficient information should be provided so that the consequences of the process are fully understood.

Self-exclusion is for a fixed period, that lasts for a minimum of six months; customers can request extensions to their self-exclusion for one or more periods of six months.

The Company will make arrangements for customers to self-exclude without entering its Premises but require a face-to-face meeting with the customer. Customers are given an explanation, where possible in private, about the consequences of the self-exclusion. The Company will take into account any specific requests from customers such as where they live, work and travel to gamble and encourage customers to self-exclude from other local sites.

Customers are given the opportunity to self-exclude immediately and informed that the Company does not permit a cooling off period. If the customer wishes to consider self-exclusion further, they may return to initiate self-exclusion later.

Customers are informed that self-exclusion has an immediate effect once initiated and lasts a minimum of 6 months; customers can extend a period of self-exclusion on request by periods of a minimum of 6 months.

A Self-Exclusion Request form will be completed, and the customer asked to assist by providing an up-to-date photograph showing a good likeness. A copy of the self-exclusion form will be given to the customer together with information on counselling and support services; a copy will be retained on site for the duration of the exclusion and a further 6 months.

The Company is enrolled in and a participant of the IHL SmartExclusion multi-operator self-exclusion scheme and customers self-excluding from the Premises will also be informed of the scheme and encouraged to participate.

An entry of the self-exclusion is made in the self-exclusion log and recorded on the Company's next annual regulatory return. The customer's details will be removed from any marketing database to ensure that no marketing materials are sent to the customer during the period of self-exclusion.

The Company has taken into account its structure and layout to prevent access by self-excluders, monitoring of the entrance by staff and using CCTV. Self-excluders will be removed if found gambling or attempting to gamble at the premises and staff are informed of breach alerts on site and at other locations through MOSES.

Staff are also trained to be alert to a self-excluder asking a third party to gamble on their behalf although it is acknowledged that this is often difficult to identify.

At the end of the self-exclusion period the exclusion will remain in place for a further 6 months unless the customer takes positive action to gamble again. This process is known as reinstatement and will normally take place in person. The Company is not required to make an assessment as to whether a reinstatement should take place, but staff are required to check that the person has considered the implication of their return to gambling.

Where a customer chooses to reinstate and return to gambling, they are subject of a 24hr cooling-off period. The self-exclusion will only end at the end of 'cooling off' period and staff are trained not to permit entry to the Premises to anyone during their self-exclusion period and to immediately remove any self-excluded customer.

Assessment of Social Responsibility Policy and Procedure

The Company assesses customer interactions to evaluate the effectiveness of its policy and procedures. Indicators of an effective policy will include:

- Customer retention
- Reduction in complaints
- Increased staff awareness
- An increase in the number of interactions recorded and the quality of the records.

Managers are required to monitor and assess staff interactions and provide additional training where it is deemed appropriate. Managers are also required to regularly check the Customer Interaction log to ensure that staff are recording all interactions and take appropriate steps to reinforce the need for all interactions to be recorded.

The Company will regularly review this policy and procedures and where it identifies areas for improvement changes will be made and implemented. These will be backed up by additional staff training and monitoring to ensure the changes have been embedded.

Staff Gambling Policy

It is the Company's policy that no member of staff is permitted to gamble on its Premises. This is to protect both the Operator and employees against any issues that can arise from the effect of problem gambling.

Should the Company become aware of any staff member breaching these rules, the staff will be dealt with under the Company's disciplinary procedure, which may result in sanctions including dismissal.

The Company is committed to protecting staff in the event of any gambling issues brought to its attention by an employee or a member of their close family. If the Company directors become aware of a member of staff with a gambling problem, they will suggest the staff member seek help through GamCare on 0808 8020 133 and will offer the same support by way of leaflets and contact numbers that is provided to customers.

Local Area Risk Assessment

The Company understands its obligation under SR Code 10.1.1 to and will conduct a local risk assessment for each premise that it operates. Such local risk assessment will be reviewed from time to time if the Company identifies any changes in circumstances. The Company will also share its local risk assessment with the local authority when applying for a new premises licence or when applying to vary or transfer an existing premises licence.

IMPLEMENTING, REVIEWING AND ASSESSING POLICIES AND PROCEDURES

The Company will keep up to date with the gambling industry and changes to LCCPs via regular visits to the Gambling Commission website and will subscribe to the Gambling Commission's fortnightly E-Bulletin.

The Company will ensure that all policies are implemented and undertake regular checks to ensure that they are still adhered to. Staff are given training by senior members of the team on induction as to the Company's policies and they are asked to sign a log to confirm their understanding.

Training includes information on the contents of these policies including:

- The protection of the business from being a source of crime and disorder;
- Anti-money laundering;
- Ensuring fair and open gambling;
- Protection of children and vulnerable people;
- Ensuring the promotion of Social Responsibility in gambling.

Existing staff are required to review and re-familiarise themselves with the current policies and procedures at least once every six months. Staff will be constantly monitored to ensure they have understood the training. Further individual training is given if there has been a breach of any policy and/or when felt necessary to ensure staff are kept up to date with legislation and regulatory requirements.

Where changes to LCCPs are implemented, the Company will review the existing policies to ensure that they are still compliant and meet with the current LCCPs. Where changes are necessary these will be made as soon as is reasonably practicable and additional staff training will take place where necessary.

The Company will review the policies at any time that there is found to have been a breach of compliance and will put in place any necessary measures to prevent a further breach and will arrange for any further staff training necessary.