



SKYCITY ADELAIDE
HOST RESPONSIBILITY PROGRAM

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Appendices:

SkyCity Adelaide Host Responsibility Roadmap 2021

Approval

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Executive Manager Host Responsibility
/ /

General Manager Support Operations
/ /

COO - Australia
/ /

1. Introduction

1.1 Background

The SkyCity Adelaide Host Responsibility Policy has been developed to ensure compliance with the SKYCITY Entertainment Group's Host Responsibility Policy and State Regulatory legislation and license requirements.

Gaming is the core component of the Adelaide product. SkyCity Adelaide is committed to minimizing harm to customers and staff due to gambling and alcohol.

The Host Responsibility Program promotes the assistance and treatment available from service providers to its customers, by proactively engaging customers experiencing possible harm utilising case management practices in addition to facilitating the application of exclusion orders.

The Host Responsibility Program also monitors the service of alcohol in accordance with responsible service of alcohol guidelines.

Although SkyCity Adelaide acknowledges the existence and significance of problem gambling and is taking measures to prevent and minimize this phenomenon, the company does not assume any responsibility concerning the personal decision to bet or gamble, which decision remains the prerogative of the individual.

1.2 Objectives of the Policy

The objectives of the Policy are to:

- Provide a safe gambling environment at SkyCity Adelaide
- Provide information to customers and concerned family members on property-wide problem gambling processes which support customers seeking to stop gambling or moderate their behaviour, and to take positive action against those who breach these processes
- Consult with Gambling Help Services and support organisations
- Promote community awareness and education initiatives on moderating problem gambling and the services available for individuals seeking to control their behaviour
- Promote the responsible consumption of alcohol
- Recognise the need for staff to be alert for customers displaying problem gambling indicators and unlawful activities such as under-age gambling and drinking
- Develop staff competence and commitment towards good host responsibility, through the provision of ongoing staff training and support
- Ensure responsible marketing, advertising, promotion, and external signage
- Enforce a standard of customer dress and behaviour

2. Management Commitment and Responsibilities

The commitment of leaders at all levels to the Host Responsibility Program and their understanding and commitment is pivotal in the development of a culture within SkyCity. Senior Leaders are chartered with ensuring that the principles of the Host Responsibility Program are entrenched throughout the business via periodical training so that all staff are sensitive to the effects that gaming products may have on customers.

The Host Responsibility Program facilitates staff commitment to:

- Promote ethical and responsible behaviour
- Maintaining the highest ethical standards in the performance of their duties

2.1 SkyCity Adelaide has an established Safe Gaming Committee. Membership includes the COO, Senior Managers, Executives and key personnel. The committee meets monthly and is chartered with oversight of the Host Responsibility Program providing direction and input into policy and operational amendments.

SKYCITY Staff are not permitted to gamble at any SKYCITY premises.

3. Service Providers

SkyCity Adelaide will maintain open and frequent liaison, consultation, and involvement with key Gambling Help Service provider(s), to ensure:

- Service providers are familiar with the Adelaide Host Responsibility Team and Program.
- A shared understanding of contemporary responsible gambling practices and services.
- Service providers and Host Responsibility Coordinators have a mutual understanding of the policies and procedures of their respective organisations.
- Ongoing effectiveness and cultural appropriateness of procedures, training, internal and external communication
- Provision of a direct access to the gambling helpline
- Regular feedback to and from the Gambling Help Service providers

In addition, Adelaide will regularly liaise with the key counselling service providers to assess the effectiveness of the policy, and to identify development trends.

SkyCity Adelaide contributes to the Gambling Rehabilitation Fund (GRF) and is a member of the problem gambling help service network.

4. Staff Training

4.1 Introduction

Policy Statement:

SkyCity Adelaide is committed to developing staff awareness of host responsibility, especially with respect to problem gambling and excessive alcohol consumption.

This includes the provision of responsible gambling and responsible service of alcohol training conducted in house and approved by the relevant regulatory body.

Training

1. Commencement of employment; managers are required to ensure new employees participate in Induction Training, which identifies problem gambling characteristics.
2. In addition to induction training, basic and advanced training for relevant employees is conducted as per the Responsible Gambling Code of Practice.
3. Course summary/workbook material of the HRP will be presented at the completion of basic and advanced training. In addition, a digital copy of the HRP will be provided to each staff member.

Duplication training for basic and advanced gambling regulations training and responsible service of alcohol refresher training will then be provided at 2-year intervals.

4.2 Host Responsibility Training Program

Adelaide will continue to provide training programs appropriate to levels of service, workplace positions and management responsibilities. These programs are multi-media training programs especially for responsible gambling and the responsible service of alcohol based on the SKYCITY entertainment Group program.

The problem gambling training programs are regularly reviewed and revised by SKYCITY Entertainment Group and SkyCity Adelaide to ensure they:

- Provide information about the potential effect of gambling on customers
- Include information on the recognition and identification of problem gambling traits
- Reflect the needs of all customers including gender, ethnicity, age, mental or physical disability and those requiring special attention
- Recognise cultural and social differences in the training process, particularly in course materials and presentations
- Incorporate the experience of service provider(s) and frontline staff to assist with facilitation of the training, particularly those who over a period of time

have regularly been associated with customers requiring customer approach under the Host Responsibility Policy

- Ensure the processes for customer approach, intervention, referral, and follow-up are clear and well understood

To ensure effective and consistent implementation of the Host Responsibility training programs, Adelaide will also:

- Provide a summary of the Adelaide Host Responsibility Policy (to provide to all staff after induction training)
- Undertake annual audit reviews of training programs for compliance with the Codes of Practice

As a responsible employer, Adelaide will also take practical steps to ensure that staff with a potential or actual gambling problem are identified and supported in seeking services required.

5. Communication

5.1 Internal Communication

Policy Statement:

Management and staff commitment to, and a high level of awareness of, responsible gambling and alcohol consumption practices are pre-requisites for all levels of host responsibility by SkyCity Adelaide staff. Regular staff communications are therefore essential, alongside training, ongoing monitoring of compliance with the policy, and recognition and reward.

Implementing the Policy:

To ensure effective and consistent implementation of the Host Responsibility Policy, Adelaide will:

- Include problem gambling and alcohol service issues, news and information in employee newsletters, magazines and digital media.
- Display responsible gambling material in all back of house areas to remind staff of the Host Responsibility Policy, and their responsibilities
- Advise staff of any significant changes to the Host Responsibility Policy or property literature, via staff communications and refresher training
- Facilitate Host Responsibility discussions by managers and supervisors with their respective teams on a regular basis
- HRC will bi-annually attend departmental meetings to ensure ongoing awareness and direction of the HRP

5.2 External Communication

5.2.1 Customers, their Families and Friends

Policy Statement:

Adelaide believes individual customers, their families, friends and communities need to have a shared understanding of responsible and safe gambling and the responsible service of alcohol. Equally each audience needs to have an understanding of their rights and responsibilities in relation to host responsibility practices.

To facilitate this SkyCity Adelaide will provide customers, their families and friends (as appropriate) with timely assistance and information. This in turn assists customers to make informed decisions about their personal gambling and alcohol consumption practices while at the SkyCity Adelaide. Adelaide also undertakes to provide a safe and supportive environment for the delivery of gaming and alcohol products and services to our customers.

Adelaide understands its obligations to a customer with regard to privacy and confidentiality. Adelaide employees are informed of their duties in relation to the privacy of customer information as described in the Privacy Act and other related legislation.

Adelaide will ensure that all gambling related advertising is undertaken in a manner that complies with the Responsible Gambling Codes of Practice.

To support this SkyCity Adelaide will:

- Prominently display signs as required by the relevant laws/acts
- Maintain a policy detailing the manner in which staff training and measures for intervention with problem gamblers are implemented
- Describe the roles of staff, by job title, in the implementation of this policy
- Prominently display responsible gambling materials
- Actively encourage each customer, family member or friend, who contacts Adelaide for assistance, to contact the appropriate treatment provider for help and support
- Ensure that quantities of helpline cards are available as required
- Prominently display the time of day throughout gaming areas
- Ensure general information pertaining to the conduct of games, including the rules, is available to customers in each gambling area
- SkyCity Adelaide will take all reasonable and practicable steps to ensure that a patron who demonstrates difficulty in controlling his or her personal expenditure has his or her attention drawn to the name and telephone number of an available gambling referral service
- Reinforce the Host Responsibility Policy in appropriate customer newsletters and other forms of media.
- Include a Host Responsibility page on its web site with access to responsible gambling materials
- Adhere to the Australian Association of National Advertisers Code of Ethics and the SKYCITY Adelaide Advertising Code of Practice for responsible marketing and advertising of its facilities

5.2.2 Community Liaison

Policy Statement:

SkyCity Adelaide will adopt a partnership approach to managing the issues related to responsible gambling and responsible service of alcohol. Customer approaches and managed responses will therefore involve community input and SkyCity Adelaide will proactively seek this input.

To facilitate, Adelaide will liaise with relevant organisations – including key gambling help service providers, key community groups, local government agencies and key Adelaide/South Australian community leaders.

This liaison will compliment input into training, communication, customer approach and self-bar and various other gambling management procedures. Additionally, the following will be conducted:

- Site visits for representatives from the community to become familiar with and discuss the Adelaide Host Responsibility Policies
- Regular meetings with the Adelaide problem gambling service providers
- Site visits for representatives of the gambling counselling service providers
- Responding to requests to make presentations to relevant groups, e.g. community groups representing those in the community at greatest risk
- Participation by an Adelaide representative in any external responsible gambling/responsible host meetings or conferences held in Adelaide/South Australia/Australia

5.2.3 Media Relations

Policy Statement:

Adelaide will continue to openly engage with in reference to the SkyCity Adelaide Host Responsibility Policy. This will be undertaken as required by SkyCity Adelaide Communications and Public Relations Department.

SkyCity Adelaide will:

- Develop media statements as and when required
- Ensure enquiries are responded to in a timely fashion

6. Host Responsibility and Early Intervention

Introduction:

The focus of the Host Responsibility Policy is:

- The prevention of gambling problems wherever possible and the identification, customer engagement and provision of information and guidance to patrons who are recognised as having or displaying potential problem gambling identifiers
- The identification and engagement with customers who may have been recognised as displaying issues with alcohol consumption.
- Compliance with the SkyCity Adelaide Responsible Gambling Code of Practice

Specific policies have been developed for the Licensee Barring process, responsible service of alcohol, customer approach (for both problem gambling and alcohol consumption), unattended juveniles and standards of dress and behaviour.

7. Early Intervention Program

Introduction:

SkyCity Adelaide's Early Intervention Program focuses on the early identification of problem gambling and intervention strategies.

- The Early Intervention Program is a result of collaboration between SkyCity Adelaide and Problem Gambling help service providers. SkyCity Adelaide and the Problem Gambling help service provider sector, that includes the Churches Gambling Taskforce and the Gambling Help Services network, have developed targeted and meaningful initiatives towards managing and addressing problem gambling
- The program is a component of SKYCITY's comprehensive Host Responsibility Policy, which includes extensive training for all staff on harm minimisation and the responsible service of alcohol
- The program includes the presence of dedicated Host Responsibility Coordinators, who are available during all open hours.
- Host Responsibility Coordinators receive specialist training prior to commencing their role. Training includes identification of problem gambling behaviour and the appropriate intervention and assistance strategies. Continued training to maintain skills and knowledge related to the gaming industry is received through the GRF and various Gambling Help Services
- The Host Responsibility Coordinator training has been developed between SkyCity Adelaide and Problem Gambling counsellors from Gambling Help services, who may be involved in the delivery of either initial or refresher training
- The Host Responsibility Coordinators are responsible for providing a service, during all operating hours, to customers, family members of customers, and staff. Specific responsibilities include:
 - Monitoring of customers and their behaviours to identify customers showing signs of actual or potential gambling problems
 - Using the Customer Service Approach (CSA) for customers showing signs of gambling problems (that either the HRC or other staff members have identified) and offering assistance and information on the various counselling services and help resources that are available
 - Facilitating contact between customers who are experiencing difficulty managing their gambling behaviour and Problem Gambling treatment providers, including Gambling Help Services and any other appropriate treatment resources, e.g. Gambling Helpline

- Liaising between SkyCity Adelaide and Problem Gambling treatment providers, including Gambling Help Services and any other appropriate treatment resource
- Facilitating the processing of exclusions, licensee barring's, case management processes and third party-exclusion requests from individuals or the families of individuals
- Monitoring customers for signs of intoxication (this is in addition to the existing requirement for all SkyCity Adelaide staff to do so)
- Monitoring the effective distribution of problem gambling information and assistance materials throughout the facility

To ensure that the Early Intervention Program operates effectively the program is discussed at Service Provider Liaison meetings between SkyCity Adelaide and the Problem Gambling Treatment Provider sector.

7.1 Consumer and Business Services (CBS) and Licensee Barring Process

Policy Statement:

To minimise the potential for problem gambling on individuals and their families and friends, SkyCity Adelaide provides the facility for voluntary barring of patrons for a limited term. SkyCity Adelaide ensures that every approach by a customer is addressed whilst the customer is on the premises or telephone.

Adelaide Host Responsibility Coordinators, Security and Gaming personnel rigorously enforce Consumer and Business Services barring's. Barred customers are not permitted to enter, or remain in, gambling areas from which they have been excluded. Action is taken against those detected committing a breach of the licensee barring. Barred patrons attempting to re-enter the premises may face prosecution as stated in their agreement. SkyCity Adelaide regularly reviews the effectiveness of these processes and, when necessary, makes amendments.

Host Responsibility Coordinators will take the necessary steps to:

- Encourage Pre-Commitment Agreements, Case Management, Gambling Help Service Provider assistance or other gambling management strategies that may be appropriate for the individual
- Facilitate the barring process when requested by a customer
- Provide a translation service for those of linguistically diverse backgrounds (including telephone interpreter services) during the application process, if requested or deemed necessary
- Encourage third party involvement as a support person e.g. a family member
- Refer customers to Consumer and Business Service seeking to rescind the barring and develop a Case Management strategy on the approval of a rescission application
- Request the barred person to nominate a counselling service that they will contact and whom SkyCity Adelaide can contact at any time to review the customer's progress
- Provide support to barred persons through the provision of immediate referral to, or liaison with, a counselling agency, with the permission of the client
- Emphasise correct processes and, wherever possible, encourage families and/or friends to accompany applicants
- Maintain a data base that is accessible to Host Responsibility Coordinators, Security and Gaming staff to ensure the detection of patrons breaching self-exclusion orders.

7.2 Loyalty Program Cardholders

Policy Statement:

SkyCity Adelaide recognises customers through its SkyCity Rewards program. It is the policy of SkyCity Adelaide to remove all barred customers from the loyalty program or update their loyalty account and messaging to reflect their status.

Adelaide Host Responsibility Coordinators, responsible for the administration of the barring and breach records will:

- Advise relevant departments of a loyalty member applying for an CBS barring, and amend the account to ensure that the barred customer is removed from any mailing database
- Retrieve the customers Membership Card.

Adelaide HRCs will ensure that the Loyalty Account is amended to reflect the exclusion status of the customer and will take all practical and necessary steps to ensure that no communication will be received by the customer while the exclusion is in place.

7.3 Responsible Service of Alcohol

Policy Statement:

The SkyCity Adelaide Responsible Service of Alcohol training program is designed for all staff who work in areas where alcohol is served or consumed, delivering a safe and enjoyable environment for all customers.

The following reflects SkyCity Adelaide's Policy in respect to the responsible service of alcohol:

- SkyCity Adelaide will provide the sale of alcoholic beverages in a responsible manner, including the monitoring of alcohol consumption
- SkyCity Adelaide will maintain an effective Responsible Service of Alcohol training program providing education to staff about the effect of alcohol on patrons. This also incorporates guidelines used in recognising excessive alcohol consumption
- All SkyCity Adelaide employees receive an overview of the Responsible Service of Alcohol program during employment induction as a component of the Host Responsibility training program, including the recognition of excessive alcohol consumption behaviours.
- Employees involved in the sale, service or monitoring and/or resolution of incidents involving the sale or service of alcohol (Food & Beverage, Gaming, Guest Relations, Security and Host Responsibility) must complete the Responsible Service of Alcohol training program
- Responsible service of alcohol information will be clearly displayed
- SkyCity Adelaide will take all practicable steps to prevent a person who appears to be intoxicated from being allowed to gamble
- SkyCity Adelaide will take all practicable steps to prevent intoxicated people entering the casino or remaining within casino gaming areas
- When appropriate, any customer may be asked for verification of identity and proof of age (legal age currently 18), before being served or sold alcoholic beverages. If such identification cannot be produced, that patron will not be

served or supplied with any alcohol and Security will be immediately contacted to attend.

- Staff will intervene to prevent possible problems arising from excessive alcohol consumption, including enlisting the services of staff of similar social/ethnic background to that of the customers to assist in explaining the program to patrons when required
- Guests may not bring alcoholic beverages onto the premises unless prior approval has been given
- SkyCity Adelaide will ensure alcohol is not supplied to reward, promote or encourage continued gambling
- Customers booking a function room for any private event must agree to abide by the SkyCity Adelaide Responsible Service of Alcohol Program and associated procedures regarding the responsible service of alcohol

7.4 Juvenile Control

Policy Statement:

SkyCity is committed to ensuring minors do not enter any gaming areas and will rigorously enforce the prevention of under-age gambling on its premises. SkyCity Adelaide will take all reasonable steps to restrict gambling activities only to those persons legally permitted by age to enter the gaming facilities (currently being 18 years of age or greater in South Australia).

Prior to entry to any gaming area Security staff will request proof of age from any customer who appears to be twenty-five years of age or less. If customers are unable to provide sufficient proof of age, they may be refused entry.

7.5 Unattended Juveniles

In the event that an unattended juvenile/minor may be present within the SkyCity precinct, and this is deemed as being associated with a guardian being on premises the following will occur:

- Employees are required to report the matter to Security and the on-duty Host Responsibility Coordinator
- Security Officers will take all practicable steps to locate an adult responsible for any unattended child
- The Host Responsibility Coordinator will attend to the child (ren) and remain with them until such time as their parent or guardian is located, or they are placed into custody of Police if deemed necessary
- In every case where negligence is suspected Police will be contacted by Security and the patron subject to a barring.

7.6 Standards of Dress and Behaviour

Policy Statement:

SkyCity Adelaide provides an environment where customers patrons are able to enjoy their surroundings. To accommodate SkyCity Adelaide adopts a policy of dress standard that aligns with community expectations in respect to standards and style of dress. To ensure customers adhere to these principles, policy standards have been set for dress and behaviour.

Dress code:

SkyCity Adelaide requires a neat and tidy standard of dress.

The following will not be permitted at Adelaide:

- Torn clothes (poor state of repair)
- Gang patches or other insignias that may represent inappropriate messaging.
- Dirty clothes or footwear
- Clothing featuring offensive language or imagery

The overall appearance of a customer is however assessed as the primary indicator beyond any individual item of clothing or an individual's preference for style of clothing dress preference based on their ethnicity or gender preferences. Security personnel are chartered with the primary/initial responsibility for assessing customers dress standard.

Behavioural Standards:

Should a person be detected intoxicated, abusing or threatening staff or other customers, causing conflict with other customers or staff, or otherwise behaving in a manner which affects the comfort or safety and wellbeing of other patrons, SkyCity Adelaide personnel will take appropriate steps to stop the behaviour including, in appropriate circumstances, having the customer escorted from the premises.

Customers detected loan sharking or begging will be requested to leave the licensed premises. Security personnel will also investigate the incident and will notify a Host Responsibility Coordinator if the patron shows signs of, or admits to having, or requests assistance in respect to a gambling problem. Should the matter of loan sharking arise beyond that of begging alms, the matter and individual will be reported to the Anti Money Laundering Officer.

8. Mental Health Awareness:

To better understand any possible mental health concerns, Host Responsibility Coordinators will undertake annual training across a range of topics to assist in mental health awareness.

9. Responsible Marketing, including Promotions and Inducements to Gamble, Advertising of the Casino and External Signage

Adelaide complies with the National Advertising Standards Authority and the SkyCity Adelaide Advertising Code of Practice

Marketing

SkyCity Adelaide offers a comprehensive entertainment proposition with restaurants, bars and entertainment, including live performances and World Class Casino offerings.

Where feasible, Adelaide will develop marketing programs, both on its account and collaboratively with South Australian tourism operators, to drive regional, domestic, and international visitation to Adelaide.

Promotions

Promotions will be conducted responsibly and will not be designed to induce patrons to either drink or gamble to excess.

Advertising

SkyCity Adelaide will ensure that, when advertising gambling products, the advertising complies with National Advertising Standards Authority and the SkyCity Adelaide Advertising Code of Practice.

Radio and Television Advertising

When SkyCity Adelaide utilises radio and television mediums, we will ensure that advertising does not include sounds normally associated with the playing of gaming machines, including but not limited to:

- the sound of coins landing in a coin tray
- any sound made by a gaming machine when a prize is won

Prize Advertising

When advertising gambling products in a manner that refers to, or relies on, the value or nature of one of the prizes which are available to be won (whether or not the prize is a prize of money) or the frequency with which the prize might be won, the advertising:

- will include sufficient information to allow a reasonably informed person to understand the overall return to player, or if the product does not have an overall return to player, the odds of winning and
- in addition, if the advertising is intended to encourage a person to gamble during a particular period, will include sufficient information to allow a reasonably informed person to appreciate how likely it is that the prize will be won by someone during that period

The Advertising Codes of Practice and Responsible Gambling Codes of Practice will be available upon request at customer service points.

10. SkyCity Adelaide Host Responsibility Management

Policy Statement:

Adherence to the Adelaide Host Responsibility Policy will be the responsibility of the Executive Manager Host Responsibility and the Senior Leadership Team.

The Executive Manager Host Responsibility will:

- Regularly review the SkyCity Adelaide Host Responsibility Program and Host Responsibility Standard Operating Procedures
- Conduct regular audits and reporting requirements

11. Host Responsibility Policy Implementation

To achieve the objectives of the Host Responsibility Policy the Executive Manager Host Responsibility will be assigned the overall responsibility for its implementation. Together with other relevant managers and will be tasked with the implementation of the policy and associated systems and processes and will regularly review progress.

This approach ensures that SkyCity Adelaide coherently pursues best practice with oversight and control of each element of the program.

12. Reporting / Measurement

The Host Responsibility Program will be subject to regular measurement and reporting.

- The Executive Manager Host Responsibility will undertake regular reporting to the Adelaide Senior Leadership Team, Adelaide's Harm Minimisation Committee and the SKYCITY Entertainment Group Host Responsibility Committee.

13. Policy Review

As well as maintaining high standards acceptable to our customers, community, and staff, SkyCity Adelaide operates with an ethos engaging openly with regulatory bodies and government agencies.

SkyCity Adelaide will regularly review the Host Responsibility Program to identify required amendments arising from regulatory or internal procedural changes. In partnership with SkyCity Entertainment Risk and Assurance personnel SkyCity Adelaide will review the Host Responsibility Program in its entirety in consultation with regulatory bodies, and appropriate service providers to ensure ongoing effectiveness and compliance