



Apple Marketing Group
The Fundraising Specialists

Apple Marketing Group Pty Ltd

Commercial Raffle Organiser
Responsible Code of Conduct – Gambling

August 2023

1. Commitment to Responsible Raffle Gambling

Apple Marketing Group Pty Ltd (AMG) provides raffle ticket sales, through telemarketing, to members of the Victorian community on behalf of our Not for Profit clients. We acknowledge that a small portion of the community can find themselves at harm when gambling to excess.

AMG makes a commitment to the community and its clients that we will provide an environment where a consumer can make an informed decision about their raffle ticket purchase and provide information about responsible gambling on all customer communication.

The Privacy Officer is appointed with the role of ensuring the Code is carried out and complies with the Gambling Regulation Act, the VCGLR Criteria and Benchmarks and Ministerial Directions and will manage and maintain a Customer Service Log (*refer Appendix A*).

2. Availability of the Code of Conduct

AMG's code of conduct is available on the company's website; www.applemarketing.com.au

Our code will be made available to customers upon request and will be issued to them in an agreed format, either via mail or email. When a client does business with AMG our code may be added to their website.

Our code is available in AMG's employee manual and on staff noticeboards.

3. Responsible Raffle Gambling Message

Our code will be mounted and displayed in each department where outbound/inbound calls are made/received. The "Problem Gambling" website and telephone number is also published on all telephone calling scripts.

4. Responsible Gambling Information

Information about the following is available on request by calling 1800 811 866 and speaking with the Privacy Officer:

- a) how to gamble responsibly – [e.g. decide before you buy how much you want to spend]
- b) the availability of gambling support services
- c) restrictions that apply to the provision of credit or the lending of money by AMG for the purposes of purchasing raffle tickets

5. Gambling Product Information

The terms and conditions for the conduct of a raffle will be printed on the ticket and/or information material designed to promote the raffle, the charities website and a raffle hotline will also be included on all communication.

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

6. Customer Loyalty Scheme Information

If a VIP Club is available for a particular charities raffle, an invitation to join the club will be added to the customers raffle ticket order or may be solicited through a telephone call.

The VIP Club enables customers to pre-order a set amount of raffle tickets (not exceeding 50 tickets) at the commencement of a new raffle for a particular charity. VIP Club members may enjoy a bonus prize draw for their loyalty and prizes are delivered as per the raffle permit conditions.

All communication mailed to VIP Club Members;

- a) Welcome Pack
- b) Confirmation letter and tickets for each raffle
- c) Membership Renewal letter

will display the Responsible Gambling and Product Information as set out in items 4 and 5.

A customer also has the option to cancel their membership, at any time by notifying AMG or the particular charity in writing or by telephone. The cancellation details are set out in the Welcome Pack.

7. Interaction with Customers

AMG telephone staff will assist customers who request it with information about help with a gambling problem. Telephone canvassers will include referral details to a Gambler's Help telephone service and/or information materials prepared by Gambler's Help services.

The services highlighted will be:

- Gamblers Help Line 1800 858 858
- www.responsiblegambling.vic.gov.au

AMG will also provide information on gambling support services to all its customers when any written communication is sent. The Gambling services above may be highlighted as a "PS:" and/or added to the payment coupon.

Where a customer requires further information and direction regarding gambling support services, AMG will provide this on an individual basis and upon request. An example may be counselling support for families of problem gamblers.

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

- a) Telephone canvassers will offer to end the call/call back later if the customer wishes to continue with their ticket purchase [cooling off period].
- b) Provide a telephone number whereby credit card purchasers could amend or cancel their order [cooling off period];

AMG allow a maximum sale of 50 tickets per customer per transaction. Any requests greater than this amount will be directed to a Call Centre Team Leader who will assess the customer's request and act accordingly. Where a result cannot be achieved, The Privacy Officer will make the final decision and may consult AMG Senior Management.

All customer escalations and complaints will be added/recorded to the Customer Service Log (*refer Appendix A*).

8. Interaction and Implementation with Staff

The Privacy Officer is the main point of contact. Other personnel to assist the Privacy Officer will be the General Manager. All are available during business trading hours. The Privacy Officer will ensure our dedicated personnel are equipped with the knowledge regarding the Code and will be available to answer any problem gambling calls upon request.

AMG staff have acknowledged and signed in accordance with section 8.5A.8(3) of the Gambling Regulation Act 2003 an agreement not to purchase raffle tickets for raffles undertaken by AMG for all Victorian Clients. A copy of this is noted in each employees file.

AMG staff members are briefed on the code and the process outlined above regarding the handling of such telephone calls, during regular team briefings carried out throughout the year. The Privacy Officer will ensure regular briefings are carried and will be noted in the Customer Service Log (*refer Appendix A*).

Responsible Gambling Messages and Product Information are also highlighted in the staff newsletter on regular intervals.

9. Interaction with Problem Gambling Support Services

Twice a year, our Privacy Officer will communicate with the relevant gambling support services, the following:

- any new support services
- any information on increased gambling forms/methods
- any other information relevant to raffle ticket sales

This will be done via telephone or email or when appropriate a face-to-face forum/seminar.

The Privacy Officer will report any changes to the gambling support services we provide to our customers. This will be done through staff team meetings, staff newsletter and management meetings.

10. Customer Complaints and Quality Control

If a customer wishes to lodge a complaint relating to AMG's responsible gambling code of conduct, they should do so in writing, addressed to:

*Apple Marketing Group Pty Ltd
Attention: Privacy Officer
PO Box 3449
Southport BC
QLD 4215*

The Privacy Officer will investigate the complaint, as soon as possible, and will take the following steps to resolve a complaint:

- will acknowledge the complaint within 48 hrs of receipt
- will assess whether the complaint is relevant to the Gambling Code of Conduct and advise through written notification
- where further investigation is needed, information and feedback will be gathered from all relevant parties
- will assess whether all parties have been treated fairly and reasonably in accordance with AMG's Responsible Gambling Code of Conduct.
- will ensure you are notified on the progression of the complaint and will always be informed of the outcome through written notification. The outcome will detail the action and how the complaint has been resolved.
- will be noted and maintained in the Customer Service Log
- complaints will be provided to the Victorian Commission for Gambling and Liquor Regulation (VCGLR) upon request

If a complaint is lodged through another agency it is recommended for the complaint to be forwarded to AMG so it can be resolved as soon as possible using the steps above. If the complaint was to be managed externally through other agencies and/or arbitrators, this could prove to be a very costly process for all parties involved.

All complaints are noted in the Customer Service Log.

AMG has a rigorous Quality Control procedure ensuring our employees are monitored and quality checked for every shift they work. A portion of the employees work is quality checked each day. The results of this process are passed onto the employee within 48hrs of the initial telephone conversation.

All aspects of the call are qualified with the customer ensuring:

- The customer is aware of who they are supporting
- The customer is confident they can follow through with their commitment to purchase or on sell raffle tickets
- The customers details are confirmed, including their age

Where there is a discrepancy with any of the above, the appropriate action will be taken.

The Call Centre Manager reviews the quality control procedure daily and may enforce extra checks on certain employees.

11. Prohibition on Gambling by Minors

AMG as common practice will qualify the customer prior to the sale of a raffle ticket/s ensuring they are over the age of 18.

Raffle tickets may be sold to persons under 18 years of age except where prizes are products that cannot be legally purchased by minors such as alcohol, gambling products etc. The terms and conditions of the raffle will state that prizes of a type which could not legally be purchased by a minor [such as alcohol] will be awarded to a parent or guardian.

12. The Gambling Environment

AMG abides by the Do Not Call Register Act 2006 where calls are made from the hours of 9am to 8pm Mon – Fri and 9am to 5pm Sat. No calls are made on nationally approved public holidays.

AMG will discourage repeatedly excessive purchase of tickets by customers. To achieve this AMG will:

- a) allow a maximum sale of 50 tickets per customer per transaction
- b) the IT Manager will check data base of regular ticket purchasers to detect a pattern of excessive purchase
- c) not engage in hard/pressure sales techniques

The average length of time a customer interacts with us is approx. 47 seconds for a new customer and for an existing raffle buyer 73 seconds.

13. Financial Transactions

AMG will not cash customer's cheques or extend credit to customers to purchase raffle tickets. Customers will be advised of this at the time if they request such a service.

Prizes of cash are not permitted in Victoria by law except that cash may form up to 10 percent of a travel prize.

14. Advertising and Promotions

AMG does not usually undertake advertising and promotions on behalf of its raffle clients.

If we were to undertake such advertising and promotions we will incorporate the following standards into its advertising checklist and will assess all proposed advertising against these standards ensuring the following would be adhered to:

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

15. Review of the Code

The Code will be reviewed by the Privacy Officer to ensure it complies with the Gambling Regulatory Act and any other Ministerial directions. This will be carried out annually and will include Major stakeholders, including management, AMG's clients and employees. Any additions, notes and recommendations will be noted in the employee manual and a Memo sent to all employees regarding the updates, if any.

Employees will be notified of the annual review via the staff newsletter.

A report of the review will be provided to VCGLR upon completion, approximately by the end of June each year.

