



HILLINGDON

LONDON

Meeting:	Licensing Sub-Committee	
Date:	Monday 27 October 2025	Time: 10.00am
Place:	Committee Room 6	

ADDENDUM SHEET

Item: 5 – Submission from Applicant/ Agent	Location:
<i>Amendments/Additional Information:</i>	<i>Officer Comments:</i>
Additional submissions from the applicant/ agent.	

LONDON BOROUGH OF HILLINGDON LICENSING SUB-COMMITTEE

Hearing Date: 27th October 2025

MERKUR SLOTS UK LIMITED
Part Ground Floor, 62 Station Road, Hayes, UB3 4DF

SKELETON ARGUMENT **On behalf of the Applicant**

I. INTRODUCTION

- 1.** This is an application by Merkur Slots UK Limited for a new bingo premises licence at 62 Station Road, Hayes, UB3 4DF (part ground floor).
- 2.** The application is consistent with and fully respects the gambling principles which govern this application, recognising and giving effect to the Gambling Commission's published Code of Practice and Guidance to Licensing Authorities, Hillingdon Council's Statement of Licensing Policy, and the gambling licensing objectives.
- 3.** The applicant has produced a detailed Bundle of evidence ['the Bundle'] in support of its application. The Bundle includes:
 - a. Witness evidence from the applicant's Head of Compliance, Operations Director and Head of Machines.
 - b. Operational documentation, explaining how the licensing objectives are met and promoted through policy and through staff training
 - c. Leveche Associates Ltd reports, firstly explaining the history and ambit of their instruction to observe and assess Merkur Slots UK Ltd (Bundle/pp147-150), and secondly their reports for an analogous venue in Southall (Bundle/pp151-186).
- 4.** It is respectfully submitted that there is no proper basis to refuse this application and the sub-committee is respectfully invited to grant it.

5. The balance of this Skeleton Argument falls into the following parts:

- The applicant, paragraphs 6-11
- Regulatory Compliance, paragraphs 12-25
- Legal Framework, paragraphs 26-36
- Application of section 153 principles, paragraphs 37-48
- Representations, paragraphs 49-50

II. THE APPLICANT

6. The applicant is a national provider of gaming facilities. It operates to the highest standards of social responsibility and compliance.

7. It has over 230 trading premises. Its sites are across a range of areas, geographically and socially, with a significant presence in London boroughs. These are divided into adult gaming centres and bingo premises. Under the legislation, the gaming machine entitled is identical in both, but in bingo premises there is an added opportunity to play bingo games on tablets. Therefore, in those premises in which the applicant wished to offer bingo, it applies for a bingo premises licence rather than an adult gaming centre ['AGC'] licence.

8. The applicant has never been refused a licence. None of its trading licences have ever been reviewed.

9. The applicant operates in a range of areas, including areas experiencing high social deprivation and other social issues. Its systems, staff training, compliance monitoring and audit processes are robust and effective to ensure the promotion of the licensing objectives. The applicant is a learning organisation, which seeks through liaison with relevant authorities and its own processes of self-assessment to immediately resolve and improve any rare instance of an issue arising.

10. The applicant is proud of its excellent record. It attributes its success to its carefully developed processes, summarised below, and its continuous drive for excellence.

- (a) The applicant has detailed systems for compliance with the law and promotion of the licensing objectives, which it (i) implements through staff training and management programmes, (ii) supervises through area and national management oversight, (iii) audits, including through independent audit. All of these processes are described in detail in the submitted evidence.
- (b) Staff are not behind the premises counter taking or paying out bets. Staff are on the shop floor, supervising the premises and greeting customers as they enter. Customers are accordingly subject to supervision and assessment from the point of entry and throughout their time in the venue.
- (c) Uniformed staff greet those entering the premises. This is an opportunity to observe whether the customer appears to be under 25, in which case Think 25 is operated, or whether the customer presents any other issue. The staff member will check whether the customer needs assistance.
- (d) Alcohol is not sold and is strictly prohibited.
- (e) Those under the influence of drugs or alcohol are not admitted.
- (f) Children are not admitted.
- (g) Customer numbers are very low.
- (h) The customer demographic is adult, and up to 50% female. Customers typically, in fact almost universally, attend alone or with a partner or single friends. Groups are atypical.
- (i) There are no 'events' in bingo premises – for example, screening of football matches or horse races. There is no reason to stay in or hang around the premises.
- (j) There are no general seating groups for people to gather inside the premises. The premises are not fitted out for or to encourage groups to attend or gather and there is no space for such gathering.
- (k) The layout of the premises is designed to and does facilitate effective supervision.
- (l) Premises are calm, and quiet, and low-key.
- (m) High quality CCTV systems are fitted inside and out so that customers know they are under surveillance.
- (n) Exterior loitering does not occur.
- (o) The interiors are clean, well-lit, comfortable and carpeted.

- (p) There are clear, unimpeded sightlines. There are no areas in which misbehaviour could take place unnoticed.
- (q) Toilet facilities are provided. Entry is supervised.
- (r) Customers are offered tea and coffee and snacks. Typically, customers will chat with staff. On departure, they leave quietly and individually with no impact on the locality.
- (s) Staff levels are set following and in accord with a premises specific security risk assessment. There is no pre-planned single staffing after 2000hrs in any premises.
- (t) Any challenging or potentially problematic customer behaviour is immediately identified – partly because of the tiny customer numbers, partly because of the design of the premises, partly because of the role and function of the staff at the premises. It is immediately dealt with and resolved. And it is recorded, on CCTV and on staff tablets, however minor, for supervisory view.
- (u) Staff Guard is deployed. This enables staff to use a portable alarm to liaise with a central security hub and SIA-licensed staff with audio and visual feeds, and for hub staff to speak directly to customers. Customers therefore know they are being overseen. Staff Guard personnel can liaise directly with local police as necessary. The net effect of Staff Guard is typically to swiftly defuse any incident, as a customer is aware they are under surveillance.
- (v) Staff do not carry floats.
- (w) Safes are time-delayed.
- (x) Anti-money laundering systems are used on the machines.
- (y) Staff receive an initial 6 week training course followed by regular refresher training.
- (z) Staff training includes training on the specific locational and social context and on how to deal with difficult customers.
- (aa) Premises are fitted with maglocks, enabling entry to be controlled, immediately, if necessary.
- (bb) Alarms are installed enabling direct access to the police.
- (cc) Every premises is subject to security risk assessment and regular re-assessment. The need or desirability of further or amended measures are accordingly swiftly identified and actioned.
- (dd) The applicant maintains close and good liaison with its local police authorities.

- 11.** The net purpose and effect of these systems is to ensure the applicant provides a safe, welcoming, and pleasant environment for its customers whilst promoting the licensing objectives and minimising the risk of any incidents. Whilst incidents do occur, they are very rare; they are always recorded, however minor, and swiftly resolved; they are used and viewed as opportunities to extract any relevant learning and possible improvements.

III. REGULATORY COMPLIANCE

- 12.** The applicant is part of the Gauselmann group. This is one of the most experience providers of gaming premises on the high street across the United Kingdom, including both adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo halls.
- 13.** The applicant and its sister companies regard compliance with the law and licensing objectives as paramount. This translates practically into a strong focus on staff training and management programmes, supervision through area and national management oversight, supported by independent audit processes. For example, premises level data on customer interactions is harvested on tablets, supplied to head office and audited monthly to ensure all premises, including individual staff within premises are operating in full compliance with requirements and expectations.
- 14.** Bingo premises are subject to a high degree of regulation, which supports the licensing objectives. This includes:
- a. Premises and their management and operation are subject to the Gambling Commission's extensive Licensing Conditions and Codes of Practice applicable to non-remote bingo operating licences
 - b. Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament

- c. The number of machines, the way they operate and their stakes and prize limits are strictly regulated through Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limited as pub fruit machines, with 20% governed by the same limits at other high street gambling establishments (AGCs and betting offices).
- d. Operators are also answerable to the Gambling Commission. They have to provide regulatory returns, report on key events and subject themselves to periodic corporate assessments.
- Premises may also be visited by licensing officers and Gambling Commission officers, who will check on their compliance.

The nature of high street bingo premises

- 15.** Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 9:1. As to impact, betting offices can bring with them social issues. Hence, when an application is made concerning a bingo premises licence, it is sometimes thought that it will bring with it the same kind of issues as sometimes arise at high street betting offices. When applications are made for late night operation, concerns are sometimes expressed that they will produce the same kind of issues as pubs, clubs and fast-food restaurants.
- 16.** In fact, high street bingo premises in general and the applicant's in particular are completely different from other premises in terms of local impact.
- 17.** It is therefore important to try to convey why the applicant's premises trade without regulatory concern.
- 18. *On arrival.*** It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering and importuning passers-by. The absence of such activity is not only observable but is explained by several facts:

- a. The customer demographic is different from betting offices. It is older and up to 50% female with customers coming in alone or with partners rather than in groups.
- b. There are no “events” in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
- c. There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
- d. Alcohol is not only not sold but strictly prohibited. Nobody in a high street bingo premises is under the influence of alcohol.
- e. Those under the influence of drugs or alcohol are not admitted.
- f. Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are on the shop floor, greeting customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
- g. Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. If loitering occurs, it is dealt with.

19. The effect on the streetscape is important. Those passing high street bingo premises do not have to walk past groups of people standing or misbehaving in the street. Consistent and authoritative evidence on this topic is included within the Bundle.

20. *Exterior appearance.* The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices, or pubs. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted and that CCTV is in operation, alongside responsible gambling messaging.

21. *Upon entry.* Those entering will be greeted face to face by a uniformed member of staff. This is an opportunity to observe whether the customer appears to be under 25 (in which case Think 25 is operated), or whether there may be any other issue such as inebriation, in which case the customer will politely be asked to leave. The staff member

will check whether the customer needs any other form of assistance. This interaction means that staff are aware of who is using their premises. Again, this is unlike betting offices where staff are behind a counter taking and paying out bets.

22. *Appearance.* The interiors are clean, well-lit, comfortable and carpeted. Toilet facilities are provided. Responsible gambling messaging is prominently displayed throughout the premises and on the machines. Customer information leaflets are also prominently displayed, explaining where and how to obtain help with problem gambling.

23. *Participation.* Customers have an opportunity to play bingo on tablets, which includes games generated on the devices themselves, and also links to a national game, and to play gaming machines, the limits for which are set by law. During their stay they are offered tea/coffee and snacks. When they are finished playing they leave without impact on the locality, particularly since, unlike in pubs and clubs, alcohol is not available and the atmosphere is quiet and calm.

24. *Protection of vulnerable people from being harmed or exploited by gambling.* So far as vulnerable persons are concerned:

- Alcohol is not permitted in the applicant's bingo premises.
- Those who are intoxicated through alcohol or drugs are not permitted on the premises.
- "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.
- All machines display responsible gambling messages with helpline contact details.
- Customers may set deposit and time limits on machines to assist them with managing their gambling behaviour.
- The premises are supervised by staff who are trained to notice behavioural indicators of vulnerability.
- As required by the Gambling Commission's Licence Conditions and Codes of Practice, the applicant's systems include processes for customer interaction and self-exclusion. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.

25. *Protection of children from being harmed or exploited by gambling.* As regards this objective:

- Although children are entitled to enter bingo premises as a matter of law, children are not allowed in the applicant's premises.
- The exterior contains no advertising or marketing which might be attractive to children.
- The exterior (and the interior) contains prominent messaging stating that Think 25 is applied.
- Those entering are greeted by staff members, so that their appearance is checked immediately.
- Staff are required to log all Think 25 events electronically, with premises data checked by the applicant's audit department to ensure that the system is being properly operated.
- Third party age verification testing is conducted.
- It is fair to report that the outward appearance, interior ambience, supervision, layout and product in bingo premises are not attractive to children, and the applicant's systems have proved more than effective to ensure that underage gambling is not an issue in its premises. It is also right to mention that, trading on busy high streets nationally, premises are almost always in close proximity to retail and service outlets attractive to children, but this has not proved problematic.

IV. LEGAL FRAMEWORK

26. Section 153 of the Gambling Act 2005 ['the Act'] sets out the principles which govern the approach to gambling applications. It provides as follows:

153 *Principles to be applied*

(1) In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- a) in accordance with any relevant code of practice under section 24,*
- b) in accordance with any relevant guidance issued by the Commission under section 25,*
- c) reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b)), and*
- d) in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).*

(2) In determining whether to grant a premises licence a licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide.
(underlining added).

27. The gambling licensing objectives are set out in section 1 of the Act and are:

- a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,*
- b) ensuring that gambling is conducted in a fair and open way, and*
- c) protecting children and other vulnerable persons from being harmed or exploited by gambling.*

28. ‘Disorder’ does not mean ‘nuisance’, as expressly explained by the Gambling Commission in its Guidance to Licensing Authorities [‘the Guidance’]:

5.5. In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance

29. Where the criteria set out in section 153(1)(a)-(d) are satisfied, there is a mandatory ‘aim to permit’ the application. The Gambling Commission describes this ‘aim to permit’ as the ‘primary obligation’ of licensing authorities: Guidance, §7.56.

30. As the sub-committee will be aware, this is an approach which differs significantly from the approach required under, for example, the Licensing Act 2003. This sub-committee is mandated to aim to permit applications under the Gambling Act 2005 which are 'reasonably consistent' with the gambling licensing objectives. The expected demand for the facilities reflected in the application is expressly irrelevant to the decision.

31. Paterson's Licensing Acts provides the following commentary on this provision (§5.56 at Bundle/p255):

'... A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling.'

32. Moral or ethical objections to gambling, a general dislike of or distaste for gambling, or a concern that gambling is or may be generally undesirable in an area are all similarly irrelevant to the sub-committee's decision. The Guidance provides as follows:

5.34. *Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area ...*

33. The guidance further provides that:

5.31. *Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.*

9.28. *Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice*

and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

34. Accordingly, a sub-committee may not reject an application unless there it has evidence that the licensing objectives are unlikely to be met upon the grant of the application, and may not reject it where any outstanding issue can be addressed by the use of a condition. A condition may not be imposed unless it is necessary. Again, the approach that a sub-committee must take to an application under the Gambling Act 2005 differs importantly from the approach to be taken to an application under, for example the Licensing Act 2003.

35. Issues that are irrelevant to the sub-committee's decision include:

- a. Nuisance
- b. A dislike of gambling
- c. A general notion of the undesirability of gambling premises in an area
- d. Moral or ethical objections to gambling
- e. Demand for gambling premises
- f. Planning matters

36. Issues that are relevant to the sub-committee's decision include:

- a. The existence or absence of evidence which demonstrates the likely impact of the grant of the application on the licensing objectives;
- b. The position of the responsible authorities, as the sub-committee's source of expertise as to such impact. No responsible authority has raised any concern about this application;
- c. The applicant's proven and extensive history of successfully operating gambling premises;
- d. The applicant's proven systems underpinning the application;
- e. Whether any condition might be necessary to as to permit the application to be granted, consistent with the mandate to 'aim to permit.'

V. THE APPLICATION OF SECTION 153 PRINCIPLES

37. Each of the four principles set out in section 153 of the Act is considered below.

a. Code of Practice issued pursuant to section 24 of the Act

38. The relevant Code of Practice published by the Gambling Commission is reproduced at Bundle/section 7. It covers all of the gambling objectives and sets out requirements and expectations as to, for example, age verification, customer interaction, self-exclusions, and exterior advertising.

39. The Code requires the submission of a local area risk assessment. That assessment (the 'LARA') has been completed and was submitted with the application.

40. There is no suggestion, in respect of this application or generally, that the application does not comply with the Code.

b. Guidance issued pursuant to section 25 of the Act

41. The relevant Guidance is published and from time to time updated by the Gambling Commission. It covers a wide range of relevant topics, including the layout and supervision of the premises, and the adequacy of control over local risks.

42. The Guidance confirms that the licensing authority need not investigate the suitability of the operator, or the fairness and openness of gambling, because these are both controlled by the Commission through the grant of the operating licence: Guidance §§5.10-5.11.

43. There is no suggestion, in respect of this application or generally, that the application does not comply with the Guidance.

c. Licensing objectives

44. The question for the sub-committee is whether the application is reasonably consistent with the three gambling licensing objectives. Taken with the overarching aim to permit,

any argument that gambling or additional gambling inherently risks arms is precluded and irrelevant.

45. The silence of all responsible authorities is of key relevance to a licensing sub-committee seeking to assess consistency or inconsistency with the licensing objectives. That silence is to be considered alongside the extensive and detailed and proven operational processes deployed effectively and successfully by this applicant across its estate.

46. The sub-committee is respectfully referred to parts 1-6 of the supporting Bundle, which provides detailed information about the approach and operation of the applicant, and the auditing processes to which it subjects itself, which in turn provides concrete evidence of the absence of negative impact of premises of this proposed type on the licensing objectives.

d. Statement of licensing principles

47. The licensing authority's statement, reviewed most recently in January 2023, has been carefully considered by the applicant in advance of and throughout the application process. Key relevant aspects of this Statement include:

- Bingo Premises, §§5.30-5.37
- Local risk assessments, Part 4
- Promoting the licensing objectives, Part 2

48. The sub-committee is respectively referred to sections 1-6 of the Bundle, which demonstrate the thoroughness of the applicant's attention to these key relevant aspects, and to the Statement generally.

VI. REPRESENTATIONS

49. There is a single extant representation raising concern about the application. The author has clearly expressed a number of concerns, and nothing in this document is intended to disrespect the author or those concerns, and this applicant wishes and intends to be a good, supportive and sensitive commercial neighbour. Within the scheme of the sub-

committee's decision under the Gambling Act 2005, the representation has little if any relevant. In particular,

- (a) The sub-committee is respectfully referred to the submitted plans, which accurately set out the proposed premises layout;
- (b) The customer attendance and profile will have limited if any impact on parking issues. All responsible authorities, including the planning authority, are silent in relation to the application. The concerns expressed about parking are irrelevant to the application;
- (c) Need or otherwise for gambling facilities is irrelevant;
- (d) A dislike for gambling (and by extension customers who engage in gambling) is irrelevant.

50. There is, in summary, no basis for refusing the application. To the contrary, the sub-committee is invited to conclude and confirm that each aspect of the principles set out in section 153 of the Act are met, and to grant the application accordingly.

Sarah Le Fevre
Three Raymond Buildings

15th October 2025

MERKUR SLOTS, PART GROUND FLOOR, 62 STATION ROAD, HAYES

LICENSING SUB-COMMITTEE HEARING – 27 OCTOBER 2025

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LICENSING SUB - COMMITTEE HEARING – 27 OCTOBER 2025
WITNESS STATEMENT – AMANDA KIERNAN

1. I am Head of Compliance for MERKUR Slots UK Limited.
2. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health.
3. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe (the parent company of MERKUR Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merger of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for the Regulatory Compliance of the MERKUR organisation.

Overview

4. MERKUR is a leading national operator of bingo premises. The company operates a national estate of over 220 licensed bingo, adult gaming centre and casino premises. Over 140 of MERKUR's premises operate with a 24-hour premises licence.
5. The business of MERKUR Slots premises is a mixture of bingo (played on electronic tablets) and gaming machines. Unlike betting offices, there is no ongoing entertainment such as a sporting event, and there are no communal places for groups of customers to gather. Our premises do not experience significant peaks and troughs of customers in the way betting offices do. Customer numbers are almost always in single figures. Customers do not gather outside our premises, as they do outside some betting offices. We do not cause problems to our residential or business neighbours, some of whom have commented that our control measures and external CCTV have helped *reduce* problems in the street.
6. All MERKUR's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Random age verification test purchasing and mystery shopper visits are carried out by third party companies (Serve Legal and Store Checker) and test results can be provided to the Licensing Authority upon request. MERKUR prides itself on its high standard of venue compliance and test purchase success rates nationally.
7. MERKUR Slots customer demographics show an average age over 30. Our products are not designed for children, and do not appeal to them due to their ambience, the nature of our gaming services and customer demographics. This is consistently seen across the whole of our licensed estate.

Responsible authorities

8. We always liaise with responsible authorities when making new applications and maintain a relationship with them during the currency of any licence granted.
9. Initial contact was made with the Licensing Authority and Police officer on 19th March 2025 to explain the proposed application and operation.
10. A response was received from the Licensing Authority and Police on the 19th March 2025, with some general advisory points
11. No further correspondence was received from the Licensing Authority and Police during the objection period. Neither authority submitted an objection.
12. No response was received from any other responsible authority, nor did any other responsible authority submit an objection to the application.
13. No concerns were raised by the Child Protection Team and the Gambling Commission regarding MERKUR's bingo premises licence proposal, and neither submitted an objection to the application.

Gambling Commission

14. MERKUR has authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which MERKUR has put in place to ensure that it implements effective player protection, anti-money laundering procedures and security procedures; and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Gambling Commission's Licence Conditions and Codes of Practice ("LCCP").
15. MERKUR is subject to Gambling Commission inspection, ensuring that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence. The Gambling Commission conducted a routine Compliance Assessment on Merkur Slots during 2025 with an outcome of compliant.
16. MERKUR was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable a comprehensive review of the business, completed at Board level, involving consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and assess crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.

Staff training

17. All MERKUR staff receive initial six-week, classroom-based induction training upon recruitment, followed by 6-monthly refresher training programmes. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, LCCP, the Licensing Objectives and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction such as offering support

regarding managing time spent playing (time outs); controlling stake limits; providing information on gambling support agencies such as GambleAware; offering participation in the Bingo Association's national self-exclusion scheme; and refusing service, where deemed necessary. Excerpts from the Company's training platform are provided in the supporting documents.

18. As part of MERKUR's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face-to-face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.
19. All staff training takes on board local area characteristics, as identified in the company's Local Area Risk Assessment, consultations with responsible authorities and any representations made. MERKUR understands that local risk assessment and staff training is a live matter, which is regularly re-assessed and adapted to any emerging or changing risks in the locations in which it operates. MERKUR is committed to partnership working and will always engage with local Betwatch, Pubwatch, or similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.

Compliance

20. MERKUR has appointed a dedicated team of Safer Gambling experts, including a Safer Gambling Support Officer, Data Analyst and four Regional Compliance Support Officers who work closely with venues to provide support and face to face training on social responsibility and regulatory compliance.
21. MERKUR has a dedicated team of internal auditors that work independently within the business to continually assess compliance with the governing legislative standards and Company Policy and Procedure. Copies of our Policies and Procedures have been provided as part of our hearing bundle.
22. The Company conducts a compliance audit in each venue annually. These audits cover -
 - a. Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification.
 - b. Testing of staff on their level of knowledge and understanding of all relevant criteria. (Venues may be re-visited and any additional training needs addressed by the Safer Gambling team.)

Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed, and monthly reports are provided to Operations Teams.

23. In August 2020, Praesepe Limited, MERKUR's parent Company, and MERKUR's brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international

- experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that *'Customer care is of an exemplary standard in all MERKUR Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'*.
24. Every 18 months, MERKUR are subject to the G4 follow up audits, on each occasion it has retained its accreditation status. Following the review in 2025 the auditor commended the senior management training regarding gambling harm and social responsibility, noted that MERKUR's Safer Gambling Safer gambling (SG) has become a top organisational priority and great efforts are being made to improve staff competence in this area through the recruitment of dedicated staff and a renewed focus on training.. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.
 25. MERKUR has been praised by one of the country's leading safer gambling and gaming experts for 'championing innovation' in social responsibility. Lee Willows, who founded ESG Gaming following his tenure launching and establishing YGAM, highlighted the work of MERKUR. He said:.. "It's all about the people in Merkur, UK, who make the High Street business such an attractive place to work. Dedication, professionalism, and a firm commitment to continuous development and evaluation are everywhere. Volunteering on the 360 Advisory Board, developing training programmes and supporting compliance training is something I have not only enjoyed over the past three years, but it has supported me with my own knowledge of compliance and safer gambling."
 26. As an Operating Licence holder, MERKUR Slots UK Limited provides details of incident records and self-exclusion to the Gambling Commission as part of its Regulatory Returns and compliance process. All records are regularly evaluated to ensure that premises operate safely and responsibly.

Local issues

27. A representation to the application has been received from one local residents. The representation highlights a number of issues such as parking, an over proliferation of gambling premises and the risk to young children. The objections express concerns that a new bingo premises may exacerbate those problems currently already in existence in the area.
28. MERKUR is an experienced operator with a proven history of operating premises in challenging areas. Incidents of anti-social behaviour are rare, and if they occur, they are quickly and effectively dealt with. MERKUR'S track record is exemplary.
29. MERKUR operate a Challenge 25 Policy at all our venues, including this one, and in our experience we do not have problems with children trying to gain access to our venues.
30. As I have mentioned in the "overview' section above, MERKUR premises do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime, disorder and nuisance, due to our different clientele, customer numbers, product, layout and management. In summary –

- a. We do not find groups of people loitering outside our premises smoking or creating a disturbance, as is frequently the case with pubs or clubs. As confirmed by the extensive *Leveche* covert operations, our customers arrive, play the machines and leave.
 - b. Similarly, by contrast with betting offices, there is no ongoing entertainment such as a sporting event and no communal places for crowds to gather. Our premises do not experience significant peaks and troughs of customers.
 - c. Our customer numbers are almost always in single figures. I believe this to be a significant explanation of why we do not cause a nuisance to our neighbours.
 - d. In general, it is rare for our venues to attract customers leaving alcohol licensed venues or fast-food venues, as the entertainment offering is significantly different. MERKUR's late night operation appeals to shift workers and employees of the late-night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
 - e. MERKUR Slots premises do not play any music above background level, and in addition due to the low footfall of customers at any one time, are rarely a cause of neighbourhood nuisance.
31. MERKUR has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005, and all additional information provided during the due diligence stage of the application.
32. The Company is committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed.

Problem gambling

33. The company incorporates accredited Social Responsibility and Interaction training for its premises management teams.
34. MERKUR ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.
35. Following a customer interaction, customers may be offered a variety of self-help measures to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst

- ensuring that the Company's policies and procedures are effectively implemented.
36. Customer interactions are independently reviewed by the Safer Gambling Analyst and Compliance Manager to ensure full oversight and evaluation of actions and outcomes.
 37. MERKUR has also undergone Gambling Commission inspection. It ensures that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.
 38. Examples of some of MERKUR's responsible gambling information have been provided in the supporting documents.

Premises Operation

39. In addition to matters of staffing mentioned above and CCTV the following may be added -

Alcohol policy

40. MERKUR Slots venues do not sell alcoholic drinks, or allow them to be brought onto the premises.
41. All MERKUR Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates deescalation and conflict management, are designed to ensure minimal conflict and successful implementation of our strict policies.
42. In our experience, supported by *Leveche* covert observations, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate, regardless of premises location.

Marketing and window displays

43. MERKUR operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the LCCP and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.
44. Venue window displays are designed having regard to premises' location, particularly in busy high street areas where children and young persons may pass by.
45. MERKUR does not operate VIP membership schemes.

Conclusions

46. The business of MERKUR is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and

welcome in MERKUR Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.

- 47. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, MERKUR does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
- 48. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
- 49. Although nuisance is not a licensing objective under the Gambling Act, it is right to emphasise that our premises do not cause nuisance to neighbours.

Ms Amanda Kiernan, Head of Compliance, MERKUR Slots UK Limited

Date: 13 October 2025

LICENSING SUB - COMMITTEE HEARING – 24 MARCH 2025

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day-to-day operations across our estate of Adult Gaming Centres, and High Street Bingo premises,.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and a member of the Gaming Council of the Amusement Trade Association "BACTA" covering High Street Gaming Centre's across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position as Operations Director. This experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. In my professional experience, incidents of crime, anti-social behaviour, or public nuisance at Merkur Slots UK Limited venues — particularly our high street bingo premises — are infrequent and tend to occur in isolation. While no venue operating in a public-facing environment can be entirely immune to such issues, these occurrences are rare on an individual premises basis and are not reflective of our typical operating standards or customer experience.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, and predominantly in single figures,
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.

9. Merkur operates venues across the UK in established high street locations. Our experience shows that attempts by underage individuals to access our premises are extremely rare. This is largely due to the nature of our product, the profile of our typical customer base, and the discreet, professional presentation of our venues. Merkur's offering, in our experience, does not appeal to children or young people, and our sites are not viewed by them as attractive or engaging destinations.
10. Merkur's Think 25 policy and its consistent implementation are key components of our approach to operating responsibly. We take care to ensure that our marketing and external presentation are appropriate for the high street environment and align with regulatory expectations.
11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.
10. Our teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to ensure effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation.
13. The premises will be managed by an experienced venue manager, who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role.
14. MERKUR Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly upon entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
15. The MERKUR Slots premises layout has been developed to facilitate customer observation, and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.

16. Staff actively monitor and manage the area immediately outside their premises and record any incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
17. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer-facing areas, and it is rare for staff to be called away to back-office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. All venues are equipped with our StaffGuard system, which enables direct communication with a central monitoring station via audio and CCTV. In many cases, the monitoring station can de-escalate situations remotely through real-time support and intervention. Where an incident requires emergency assistance, the monitoring team will promptly contact the relevant emergency services, including the police, to ensure an appropriate and timely response.
19. The entrance to all venues are fitted with a magnetic door locking system. This allows staff members working to manage the entrants to the venue when in use.
20. The use of SIA accredited door supervision at any premises is decided on a risk assessment basis based on a multitude of factors per premises, with cognisance always taken of local Police and Licensing knowledge and advice.
21. All Merkur venues operate a policy of no pre-planned single staffing after 8pm.
22. We have considered the local concerns raised by the local resident and believe that should the Committee members be minded to grant the new premises licence as all perceived operational risks and fears should have been effectively addressed.

23. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training.

24. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by residents and authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises begin to operate as permitted.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 13 October 2025

LICENSING SUB-COMMITTEE HEARING – 28 MARCH 2025

SUPPLEMENTAL STATEMENT – NIGEL DAVIS

1. I am the Head of Gaming Machines for Merkur, and have held this position since 2010, and have continual service for the company since leaving school in 1980 over 45 Years' Service.
2. During this time, I have held various roles, including Venue Manager, Area Manager, Group Technical Service Manager this experience has given me great depth of knowledge of our Business, and the industry as a whole.
3. I am the Midlands Chairman of the Amusement Trade Association BACTA, and sit on various Committees. I am the Vice Chair of the GBG Machines Group, and I take a very active role withing the Machines Committee of the Bingo Association. I have held a Gambling Commission PML since 2007, when they first came into force.
4. Merkur Slots UK Limited operates over 230 'High Street Bingo' premises and Adult Gaming Centre's throughout Great Britain.
5. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly, the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines provided in accordance with the permission of a bingo premises licence.
6. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.
7. In our premises, customers can move around with the bingo terminal, choosing to play while standing or in seating provided around the premises.
8. Customers have the opportunity to play non-remote bingo in the traditional way on paper bingo cards, and on electronic tablets. The electronic tablets are also linked to a national game.
9. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centre's.
10. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to a maximum of £2.

11. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C & D gaming machines, have the same stake and prize levels as those offered in pubs.
12. The bingo tablets are a multi-purpose device offering live linked Bingo Games, Bingo Variant Games and participation in the National Bingo Game, which is played twice daily.
13. The bingo tablets provide both remote and non-remote bingo, with remote bingo being the linked games operated by WiFi within the licensed premises.
14. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling.
15. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.
16. The LCCP also require that the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that the premises are licensed for the purposes of providing bingo facilities. We comply with this requirement by a notice on the façade of the premises, which states prominently "bingo played here", and by a similar notice inside the premises.
17. Our bingo offer is the same as it is in all of our high street bingo premises across the country. It is simply an extra offer to our customers, which is long established and has given rise to no regulatory concerns of the Gambling Commission. We have no evidence that the provision of electronic bingo is harmful to any of the licensing objectives.

Mr Nigel Davis, Head of Gaming Machines, Merkur Slots UK Limited

Date: 13 October 2025

Merkur Slots UK Limited

Operational Standards



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

- 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

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

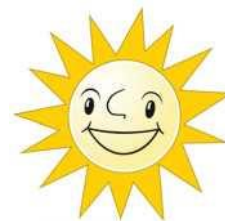
- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots UK operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots UK premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots UK employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots UK operate a robust late night working policy, which is fully supported by a fulltime Night Manager.
- Merkur Slots UK does not operate a single-manning policy between 10pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Merkur Slots UK Limited

Operational Standards

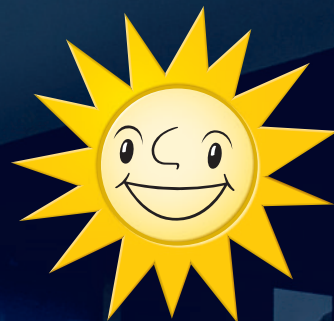


- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers complete a comprehensive 13 week induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and ServeLegal are our third-party independent partner for compliance testing. Test results are reported to the Gambling Commission.
- All licensed premise employees receive induction and six-monthly refresher training during their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- Merkur Slots UK have a Safer Gambling Team dedicated to supporting venues with meeting this licensing objective and their socially responsible requirements.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements, and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, prevention, and treatment (RPT) of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both online and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits, Safer Gambling Workshops and Annual Conferences.



WORKING TOGETHER

High Street Bingo - Licensing Brochure



Accredited by the Global
Gambling Guidance Group

THE MERKUR FAMILY

August 2025



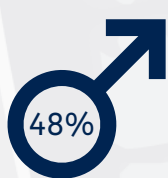
PART OF THE MERKUR GROUP

A Strong Partner For More Than 60 Years



MERKUR Casino UK is a subsidiary of the family run MERKUR Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the MERKUR Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

MERKUR Casino UK is the parent company of MERKUR Slots UK Ltd, which employs over 2,000 people in over 220 High Street gaming centres.



52% of employees are female

48% of employees are male



On the high street, our venues trade as MERKUR Slots. Our venues represent the very best in terms of exciting 'slot gaming' and entertainment and are known for their highly trained teams, first class face to face service and the very latest in venue products.

Being a responsible operator is a high priority across the MERKUR group and in the UK, as technology and customer behaviour changes, MERKUR Slots are always working to ensure that we adhere to the three licensing objectives.

**GAMBLING
COMMISSION**

MERKUR Slots UK Ltd are regulated and licensed by the Gambling Commission (003266).

Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID. We are subject to regular independent test purchases and are consistently above the average leisure pass rate.



MYTHBUSTERS

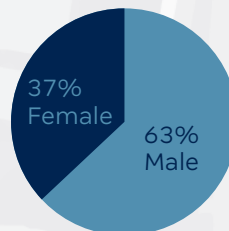
We Are Not Betting Shops

MERKUR Slots are one of the UK's largest operators of High Street Gaming Centres for adults. Our venues are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how gaming centres operate and who our customers are. We want to address these misconceptions and demonstrate that a new MERKUR Slots on your local high street is a good thing. Public concerns surrounding betting shops were largely due to the presence of Fixed Odds Betting Terminals (FOBTs), which are now more heavily regulated. Our venues do not offer, and have never offered, these types of machines. Our machines offer low stakes ranging from 10p to a maximum of £2. These machines have been around for many, many years.



The average stake from our customers is low.

The market on the high street has evolved with some of our venues now providing more modern electronic styles of bingo which vary from stand-alone multi-functional bingo, national games and paper printed bingo and tablet combinations.



Our venues appeal to all ages with our membership gender database split of 63% male / 37% female.

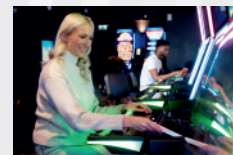
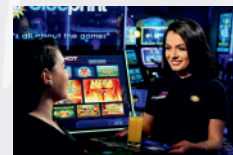


Our venues do not show live sports.



Our teams remain with the customers on the venue floor rather than behind a counter.

We provide complimentary refreshments, such as teas and coffees, to our customers.





WHY BINGO?

Traditional Bingo on the High Street

Bingo is a significant part of the MERKUR Slots business and has been so for many years – MERKUR Slots are and always have been proud to be part of the bingo industry. There is a long history of MERKUR Slots premises being used for the provision of bingo under the authority of Bingo Premises Licences prior to 2005.



MERKUR Slots high street bingo premises offer a modern form of the bingo game as part of their wider slot machine offer. Traditional bingo still has a place in the hearts of many in Great Britain, but younger generations are looking for different, more modern electronic styles of bingo.

MERKUR Slots high street bingo premises display "Bingo played here" with imagery on the exterior to ensure a customer can recognise that the premises are licensed for the purposes of providing bingo facilities.



MERKUR Slots premises aim to bring 'Bingo to the High Street'. To enable premises to offer the provision of Bingo to customers it must hold a Bingo Premises Licence.

OUR OPERATION

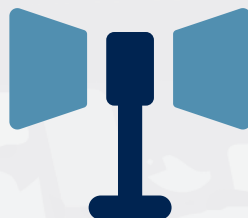
We Are Not Noisy Neighbours



Whilst we sit within the leisure sector, noise levels are very low and limited from our venues.
We currently operate 24 hours in over 174 venues.



Our machines generate low levels of noise.



We do not have tannoy systems that you find in seaside amusement centres.



We only play background music like at any other high street shop.



We are immensely proud of the fact that we have never had a licence revoked or reviewed. Incidents are extremely rare. We simply do not generate noise and anti-social behaviour.



Customers tend to visit on their own or in couples. We rarely see large groups.



Our staff will not allow anyone into the premises who appears to be heavily intoxicated. Also, we do not intend to apply for a premises licence under the Licensing Act 2003 to allow for the sale of alcohol.

Our customer base after midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts.





SOCIAL RESPONSIBILITY MEASURES IN PLACE

Compliance



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business MERKUR Slots also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on “The Essentials of Compliance and Social Responsibility” and “Safeguarding Children and Vulnerable People”.



Dedicated Learning & Development Team.

Training Centre



SMARTHub tablet in every venue for the recording of customer interactions, self-exclusions, incidents and AML reporting.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Online Training



Local Area Risk Assessments are updated annually to identify any changes in the local area.



Our Category B3 machines support safer gambling by ²³ having time and limit settings available to customers.

SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

The Company aims for its employees to have Interaction/Conversations with customers as part of the Customer Journey to ensure employees 'know their customers' and minimises the risk of them experiencing harms associated with gambling and takes into account the Gambling Commissions guidance, Formal Guidance under SR Code 3.4.1, Customer Interaction: Formal guidance for premises – based operators.



A dedicated Safer Gambling Team including Regional Safer Gambling Officers support venues with Compliance Regulation and Responsible Gambling.



MERKUR commits to a cross departmental monthly review of all compliance elements that could impact our venues or customers, with representatives from Compliance, Marketing, Product, Operations and the Board.



MERKUR Slots received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our MERKUR 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

MERKUR Slots actively engages with Trade Association Bodies.



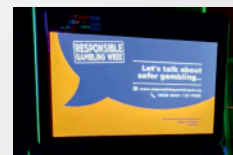
- Senior Manager representation from MERKUR Group.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



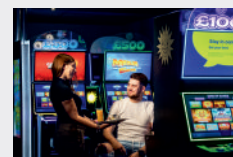
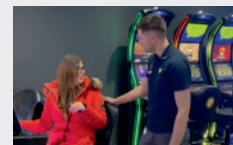
- Operations Director is a member of the Executive Committee.
- Head of Compliance is a member of the Standard Compliance Committee.



Machine Messaging



Customer Interaction Training





BENEFITS TO THE HIGH STREET

Benefits for your High Street include:



Over 90% of new MERKUR Slots venues occupy former vacant units.



Investment from £350,000 to £450,000 in long-standing vacant properties.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings and through the night.

COMMUNITY & CHARITY

MERKUR Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



Merkur Casino UK has supported over 280 charities and raised in excess of £1.5 million for good causes since 2005

Please contact us

For press enquiries:

email martha@sourcemc.co.uk

phone +44 (0) 7796 614137

MERKUR Casino UK

Second Floor

Matrix House

North Fourth Street

Milton Keynes

MK9 1NJ

phone 01908 351200

email info@merkur-casino.com





7.3. Customer Interaction

MERKUR Slots recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social Responsibility code provision 3.4.1.

LCCP 3.4.1 – Premises-based customer interaction

The company has a detailed Safer Gambling Policy for Slots Venues which supports and expands on the procedure detailed in the MERKUR Slots Compliance Manual.

The Company makes use of all relevant sources of information to ensure effective customer interactions, in particular to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If employees have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder.

Customer interaction consists of the following 3 parts:

PROCEDURE

PART 1 – Identify and observe – behaviour or activity you have spotted or something the customer tells you.

PART 2 – Interact and take action – contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3 – Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

REMEMBER reporting an Interaction is NOT the same as reporting an Incident. An Interaction is a conversation with or an observation of a customer in regard to their gambling behaviour.

7.3. Customer Interaction

Conversations that have been had with a customer, are not just to be recorded at the point that signs of Gambling Harm have been observed,

they should be a record of the customer's journey with MERKUR as part of Customer Service rounds.

Recording what is considered 'usual' behaviour, will allow all employees to understand when a change is taking place, and interact with and record the conversation at a point before a customer starts to exhibit more severe behaviour.

The above 3 parts may include the following:

- Members of staff are trained as part of their 3-month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.
- In addition to induction training, Safer Gambling Interaction and Evaluation, workshops are held with all senior management, managers, and supervisors within the Slots venues, to ensure they are fully aware of their responsibility in the monitoring and evaluation of Interaction/Conversations which take place in the venue.
- All Customer Interaction/Conversations must be logged on the Smart Tablet and are evaluated by a member of management with additional information or follow up conversation requested should it be felt insufficient information has been recorded.
- Recording a 'general' conversation that has taken place with a customer, in the course of an employee's normal customer Service role, will enable future monitoring and Interaction/Conversations to take place with any customer who starts to show a change in behaviour – whether this is visit frequency, pattern of play or length of time spent in the venue etc.
- For Machine players, machine hosts are trained to observe behaviour and have an Interaction/Conversation with customers where they observe changes in usual behaviour or signs of Gambling Harm.
- All employees are aware of those customers that are frequent visitors or deemed to be regular players. That monitoring and interaction needs to take place with these customers during their visits. An interaction may lead to the Duty Manager having to intervene or take appropriate action, possibly using the Machine Administration Reconciliation System (MARS), which provides the data to review the spend/play on most machines, for those customers deemed to be potentially at risk. Appropriate action would then be taken on a player-by-player basis.



7.3. Customer Interaction

- Behaviors that may be a result of a customer suffering from Gambling Harm may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, excessive time and money spent, damage to property, violence, or the threat of violence to staff or other customers.
- Employees are aware of where customers can be directed for confidential advice should they be approached by them for help or when they identify signs of gambling harm. This includes the Staying in Control information leaflet which includes GamCare Helpline.
- Employees are trained to guide customers through the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained, and T&Cs provided to the customer.
- The Duty Manager may consider refusing service or barring the customer from the premises and, in extreme situations involving aggressive behaviour, contact police for assistance. Any interaction that results in an incident of this type, whether police attend or not must be recorded on the SMART Incident App on Smart tablet.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts employees or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.



7.4. Self-Exclusion

Whilst most customers can enjoy and manage their gambling, MERKUR Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

LCCP 3.5 – Self-exclusion

- 3.5.1 – Self-exclusion – non remote SR code
- 3.5.2 – Self-exclusion non-remote ordinary code
- 3.5.6 – multi-operator non-remote SR code
- 3.5.7 – multi-operator non-remote ordinary code

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme.

If a customer wishes to self-exclude this can be actioned immediately by a member of the MERKUR Slots venue team via the Smart Exclusion App on the Smart Tablet.

Please note you will need a Wi-Fi connection to access the Smart Tablet.

PROCEDURE – Using the Smart Exclusion Tablet

When a customer has requested that they wish to be refused entry to our premises, the customer and the member of staff will formally acknowledge and document their request on the Smart Exclusion tablet. For further information please refer to the “Smart Exclusion User Guide” available at the venue.

Self-exclusion is sector specific: –

- **AGC Licensed Premises** – 1km exclusion zone
- **BINGO Licensed Premises ‘Traditional Bingo Clubs’** – National exclusion zone.
- **BINGO Licensed Premises ‘High Street’** – 1km exclusion zone.

The premise licence is displayed on the Information Board at the venue entrance and details the premises as having a HIGH STREET BINGO or AGC License and lists any specific conditions attached to the license. The Smart tablet is set by default to the appropriate license. Employees will need to explain to all customers who wish to self-exclude, that it is sector specific and that they will need to visit other establishments in their local area if they frequent other premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses, for them to self-exclude from ALL gambling premises.



7.4. Self-Exclusion

Please Note: the employee dealing with the self-exclusion process should make the customer aware that if they self-exclude from a High Street Bingo Premise Licence, they will be self-excluded from all Traditional Bingo clubs in the UK.

The above is detailed in the Self-exclusion Terms & Conditions – the customer will receive a copy upon activation of their self-exclusion – a copy of these are held in the Compliance and Social Responsibility Manual.

The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The Smart Exclusion tablet has a built-in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders and must be forward facing – please ensure the background is light so the image is clear. You must not use a photo of a photo or ID document.**

The employee will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

It must be made clear to the customer that they may not revoke the self-exclusion during this time and that they are entering a voluntary agreement.

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and an electronic notification will be sent to other relevant licensed premises.

Any customer held on the membership system that chooses to self-exclude will be removed from all marketing activity during their self-exclusion period.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area from any operator and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.

Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 months 'cooling off' period have a **RED** border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, the photo will automatically disappear and be archived (with the exception of Traditional Bingo Clubs who retain the details for a longer period of time unless the customer reinstates).
- Exclusions in the 24 hours 'cooling off' period have a **BLUE** border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24-hour period.



7.4. Self-Exclusion

If a customer tries to enter a relevant gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button.

REPORT BREACH

When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from, to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion period.

REINSTATE CUSTOMER

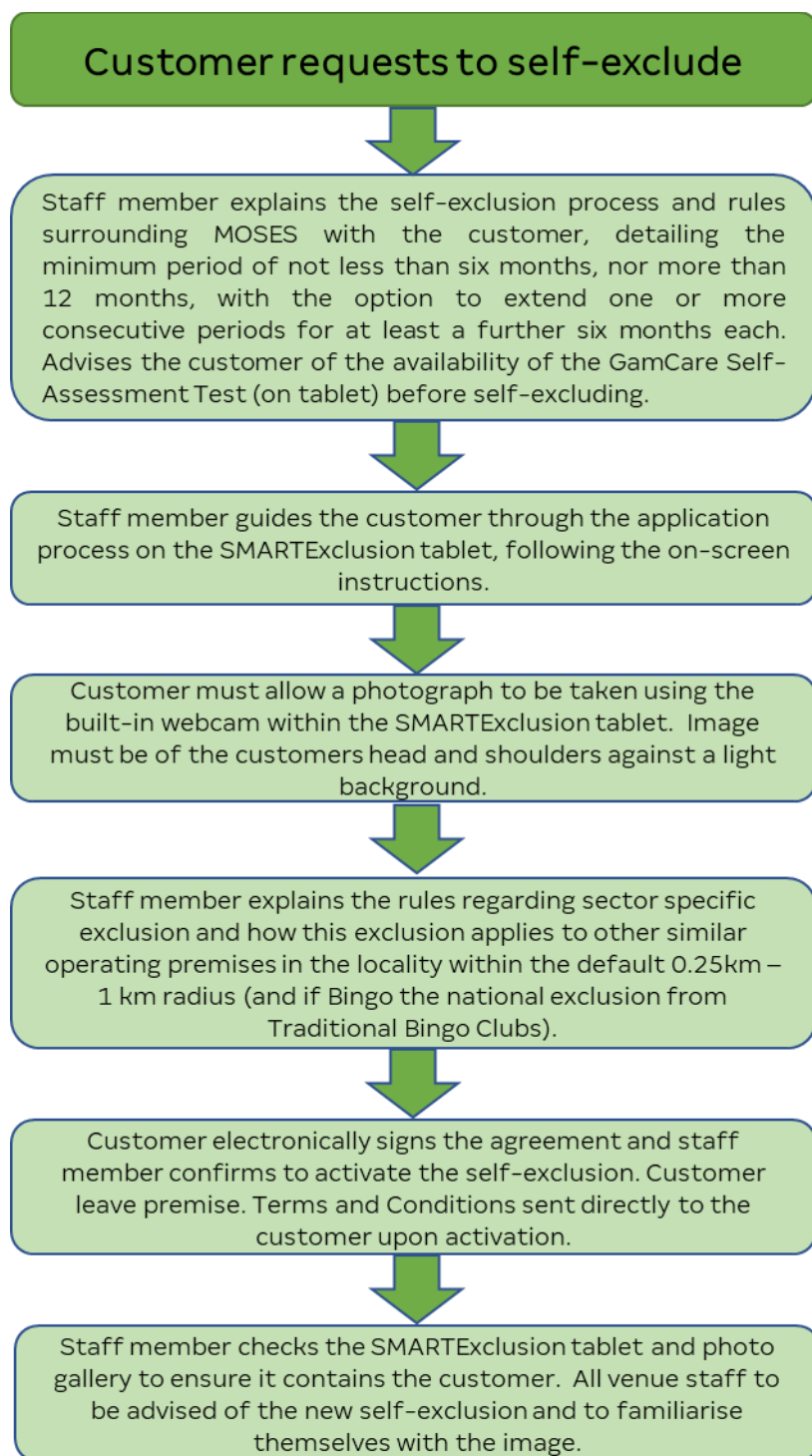
If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the button on the tablet.

EXTEND EXCLUSION



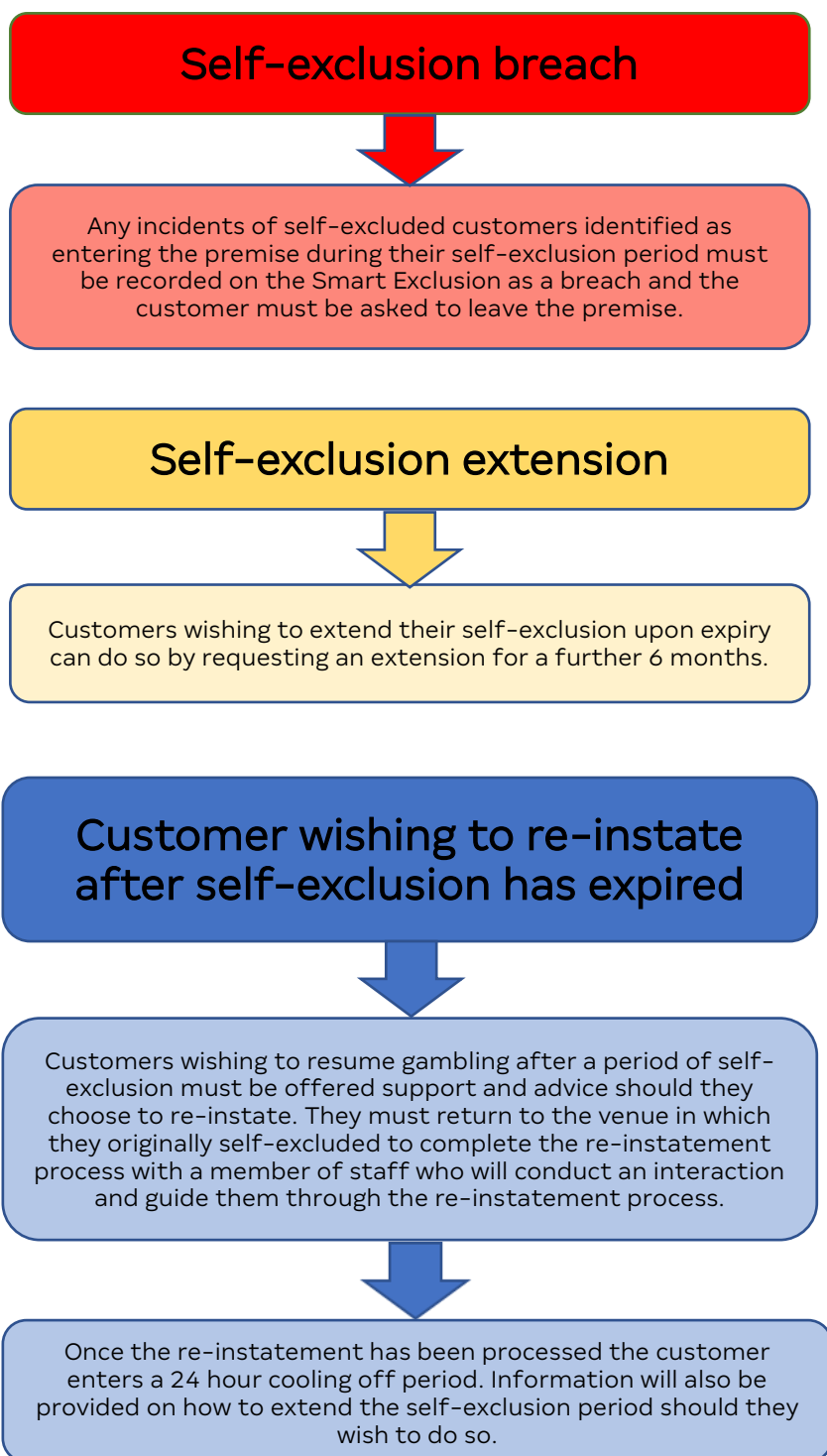
7.4. Self-Exclusion

SELF EXCLUSION PROCEDURE FLOWCHART





7.4. Self-Exclusion





7.4. Self-Exclusion

For full operating instructions for the Smart Exclusion tablet please refer to the Smart Exclusion User Guide available in the Compliance Manual at your venue.

TABLET - STAFF TRAINING

For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: **dummy**

Last Name: **test**

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

Smart Tablet malfunction

If for any reason your Smart Tablet is unavailable for use due to malfunction, please contact IT Support immediately who will investigate and resolve the issue.
ITSupport@MERKUR-casino.com

Should a customer wish to self-exclude and your tablet is not available due to malfunction please complete the Manual Self-Exclusion request form with the customer and send immediately to Compliance_UK@merkur-casino.com a member of Compliance will contact the customer for an image and ID Verification to activate the self-exclusion.

Smart Tablet theft – please contact IT Support immediately who will ensure the tablet is deactivated and a replacement arranged.

Compliance and Social Responsibility

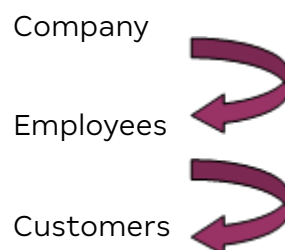
1. Social Responsibility Statement

STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. Merkur Casino UK, operating the brands Merkur Slots and Merkur Bingo, recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Merkur Slots has clear policies, procedures and codes of practice which outline and support the development of the way in which employees intervene where there is a suspected problem, and the Company then monitors and supports the development of the awareness and knowledge of its employees in dealing with such interventions.

The idea of being responsible to customers has long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives.

These are to:

- Keep crime out of gambling,
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.

It is our responsibility to ensure that we always comply with these licensing objectives.

Compliance and Social Responsibility

1. Social Responsibility Statement

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Socially Responsible procedures including Self Exclusion
- 'Think 25' policy.

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist.
- Employee Handbook.
- Reviews and sign off at 4,8,12 weeks.

The above documentation includes comprehensive coverage of the following: -

- Safer Gambling Policy.
- Social Responsibility procedures.
- 'Think 25' policy.

Ongoing training is available to all our employees, and we provide a Customer Care training programme, that specifically trains our employees about problem gambling and how to interact with customers who may be affected (including arrangements for self-exclusion), whilst also covering the following areas:

- Customer care.
- Conflict management.
- Social responsibility.

In addition, employees will receive refresher training every 6 months.

Compliance and Social Responsibility

1. Social Responsibility Statement

CUSTOMER

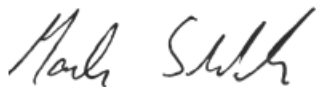
Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- | | |
|--|---|
| • Citizens advice | https://www.citizensadvice.org.uk |
| • Gamble Aware | https://www.begambleaware.org |
| • GamCare | https://www.gamcare.org |
| • GamesAid | https://www.gamesaid.org |
| • Gam-Anon | https://www.gam-anon.org |
| • Gamblers Anonymous | https://www.gamblersanonymous.org.uk |
| • Gordon Moody Association | https://www.gordonmoody.org.uk |
| • Action for Children Charity | https://www.actionforchildren.org.uk |
| • National Debtline | https://www.nationaldebtline.org |
| • Betknowmore UK | https://www.Betknowmore.org |
| • YGAM (Young Gamers & Gamblers Education Trust) | https://www.YGAM.org.uk |
| • Leeds Community Gambling Service (via Gamcare) | |

The implementation of the following policies and procedures and through Customer Care and Interaction and Evaluation Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy.
- Safer Gambling Policy.
- 'Think 25' policy.



Mark Schertle
Chief Operating Officer



Egemen Coskun
Chief Financial Officer

Responsible Gambling Messaging

MERKUR have always adopted Think 25?



MERKUR implemented 'multi-lingual' Staying in Control leaflets and posters



All digital B3 and Cat C machines have RG messaging



Responsible Gambling Messaging

Machine Set Your Limits



Gamcare QR code integrated into machine and venue signage



Safer Gambling Week



Safer Gambling Policy



Revision History

Version	Revision Date	Revised by	Section Revised
1.0	January 2024	Gill Clulow – Safer Gambling Compliance Manager	New Document
1.1	01/05/2024	Amanda Kiernan – Head of Compliance	1.5 The Compliance Team
1.2	01/09/2024	Amanda Kiernan – Head of Compliance	1.3 Licence Conditions and Codes of Practice (LCCP)
1.3	25/02/2025	Stacey Irvine – Safer Gambling Compliance Manager	Full Revision
1.4	06/07/2025	Stacey Irvine – Safer Gambling Compliance Manager	1.5 The Compliance Team

Version	Section	Reason	Sign-off
1.0	All	New Document	Amanda Kiernan – Head of Compliance
1.1	1.5 The Compliance Team	New Safer Gambling Compliance Manager appointed	Amanda Kiernan – Head of Compliance
1.2	1.3 Licence Conditions and Codes of Practice (LCCP)	Updated LCCP 30 August 2024	Amanda Kiernan – Head of Compliance
1.3	All	Full Revision	Amanda Kiernan – Head of Compliance
1.4	1.5 The Compliance Team	Appointed MLRO Update	Amanda Kiernan – Head of Compliance

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1. INTRODUCTION

MERKUR Slots is fully committed to delivering the highest standards in Safer Gambling. This policy outlines robust and effective procedures that have been implemented to ensure compliance with the current regulations and standards.

The Company has a starting position that most of its customers gamble safely and are not at risk of suffering from gambling related harm and as such present a low risk. All policies, procedures and controls are proportionate to identified Safer Gambling risks.

This policy provides guidance and a systematic approach for the Company's employees to follow, to ensure that they fully understand both their own and the Companies responsibilities under the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), Gambling Commission/Wider Industry guidance/learning and the Company's own procedures. This policy is presented in an easy to read and understandable format which contains information on all relevant procedures and guidance relating to Safer Gambling.

The latest version of this policy is available as a reference document and is available to all employees on MyMERKUR.

This policy extends to all employees, defined as: permanent, fixed term, temporary, third-party representatives, sub-contractors, agency workers, volunteers, interns, and agents engaged with the Company in the United Kingdom.

It is the responsibility of all employees to ensure that they read and understand this policy and that they are familiar with its contents. Employees with personal licences (PML) are reminded that it is their responsibility to keep themselves updated with any changes in Gambling Legislation/Guidance or the LCCP. To keep up to date with Gambling Commission communications employees are recommended to subscribe for the fortnightly Gambling Commission e-bulletin/newsletter.

This policy does not form part of any employee's contract of employment and the Company can amend it at any time. Any employee who breaches this policy may face disciplinary action in accordance with the Company's disciplinary policy, which could result in dismissal for misconduct or gross misconduct. The disciplinary policy is available to view in the Employee Handbook

1.1 Responsibility for the document

The Safer Gambling Compliance Manager has overall responsibility for the Company Safer Gambling Policy. This includes management of this policy and responsibility for Company Safer Gambling practices including reviewing, updating and the maintenance of Company Safer Gambling policies, procedures, and controls.

Any changes to this document will be devised and written by the Safer Gambling Compliance Manager with approval from the Compliance Committee, and any approval are to be recorded in the Revision History at the front of this document.

It is the responsibility of all Managers to ensure that any changes to the Safer Gambling Policy are communicated and trained to all relevant employees at their venue with training records updated accordingly.

The board will be advised of changes to the Safer Gambling Policy through the minutes of the Compliance Meetings and policy changes will be forwarded for review by Board Members with any comments documented in Compliance Meetings minutes.

1.2 Gambling Commission

The Gambling Commission was created under the provisions of the Gambling Act 2005 and is responsible for regulating the Gambling Industry within the United Kingdom.

Three key regulatory goals underpin the Gambling Commission's activity, these regulatory goals are defined by the Gambling Act 2005 and are known as the Licensing Objectives. These Licensing Objectives are mandatory and are detailed below.

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

Where the Company or a licensed employee fail to uphold the licensing objectives, for example ignoring their Safer Gambling responsibilities or failing to comply with the Licensing Conditions and Codes of Practice (LCCP), the Gambling Commission may consider reviewing the company operator's licence and/or the individual employee's personal licence (PML) under Section 116 of the Gambling Act. Where failings are identified sanctions can result in penalties from a warning up to revocation under Sections 118 and 119 of the Gambling Act 2005 (the Company can also be subject to financial penalties under Section 121 of the Gambling Act).

1.3 License Conditions and Codes of Practice (LCCP)

The LCCP sets out the mandatory conditions (issued under Section 24 of the Gambling Act 2005) which the Company must meet to hold its operating licence. The latest LCCP revision can be found online:

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

The LCCP is broken down into three parts; Operating Licence Conditions attached to operating licences (mandatory), the Code of Practice Provisions (social responsibility and ordinary provisions) and Personal Licence Conditions attached to personal licences.

The principal codes of practice are divided into Social Responsibility Code Provisions (SRCP) which are mandatory and Ordinary Code Provisions (OCP) which are considered best practice.

The key Operating Licence Conditions (both AML and Safer Gambling/Social Responsibility) relating to MERKUR Slots are.

- Qualified persons and personal licenses (1.1.1, 1.2.1 and 1.2.2).
- General Fair and Open Provisions (7.1.1).
- Prevention of money laundering and terrorist financing (12.1.1).
- Access to Premises (14.1.1).
- Reporting suspicion of offences (15.1.1, 15.1.3).
- Reporting key events (15.2.1, 15.2.2, 15.2.3)
- General and regulatory returns (15.3.1).
- Responsible placement of digital adverts (16.1.1).

The key Code of Practice Provisions (Ordinary and Social Responsibility) relating to MERKUR Slots are.

- General (OCP 1.1.1) and (SRCP 1.1.2).
- Protection of Children and Other Vulnerable Persons (SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7, 3.6.2, 3.6.5, 3.6.6, 3.8.2).
- Think 25 (SRCP 3.2.3, (8), 3.2.5, (7)).
- Fair and Open Provisions (SRCP 4.1.1, 4.2.2).
- Marketing (SRCP 5.1.1, 5.1.6, 5.1.9, 5.1.11) and (OCP 5.1.8, 5.1.10).
- Complaints and Disputes (SRCP 6.1.1).
- Gambling Licensees' Staff (SRCP 7.1.2).
- Information Requirements (OCP 8.1.1).
- Gaming Machines in Gambling Premises (SRCP 9.1.2).
- Assessing Local Risk (SRCP 10.1.1) and (OCP 10.1.2).

1.4 Trade Association – BACTA & Bingo Association

The Company are members of both BACTA and the Bingo Association, with representatives on the respective Social Responsibility Committees. The trade associations have created sector specific codes of conduct for responsible gambling which the company follows. The key actions are outlined <https://www.bacta.org.uk> and <https://bingo-association.co.uk>

1.5 The Compliance Team

The Company has a Compliance Team who can be contacted by any employee by email: Compliance_UK@merkur-casino.com

Head of Compliance

Name: Amanda Kiernan – Email: akiernan@merkur-casino.com

Safer Gambling Compliance Manager

Name: Stacey Irvine – Email: sirvine@merkur-casino.com

Safer Gambling Support Officer

Name: Daniel Hargreaves – Email: dhargreaves@merkur-casino.com

Safer Gambling Support Analyst

Name: Will Bridgman – Email: wbridgman@merkur-casino.com

Compliance Manager/MLRO Nominated Manager

Name: Joanna Whitehall – Email: jwhitehall@merkur-casino.com

2. REGULATORY FRAMEWORK

2.1 Legal Background

The Company Safer Gambling Policy is based on the following.

- The Gambling Act 2005 ('the Act') – The principal legislation that is used to regulate the United Kingdom Gambling Sector, <https://www.legislation.gov.uk/ukpga/2005/19/contents>
- The Gambling Commission Licence Conditions and Codes of Practice ('LCCP') – The Code of practice provisions provide. mandatory obligations under the Social Responsibility Code Provisions (SRCP), <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp>

The Company has further considered numerous sources when identifying and assessing the key risks to its licensed activities such as.

- Gambling Commission Safer Gambling Hub, <https://www.gamblingcommission.gov.uk/public-and-players/safer-gambling>
- Gambling Commission Compliance Hub, <https://www.gamblingcommission.gov.uk/licensees-and-businesses/compliance>
- Advisory Board for Safer Gambling <https://www.gamblingcommission.gov.uk/absg>
- Wider industry learning including Gambling Commission guidance and enforcement actions, <https://www.gamblingcommission.gov.uk/news>
- GamCare <https://www.gamcare.org.uk/>

2.2 Information Requirements and Access to Premises

The Company conducts its gambling operation in accordance with both the licensing objectives and LCCP and works with the Gambling Commission in an open and co-operative way. Information is submitted to the Gambling Commission as required through Key Events and information requests are responded to accordingly.

Employees will cooperate with Gambling Commission officials and are made aware of entry requirements for Gambling Commission Enforcement Managers under Part 15 of the Gambling Act 2005.

3. FINANCIAL REQUIREMENTS

3.1 Anti-Money Laundering and Counter Terrorism Financing

The Company has in place Anti-Money Laundering and Prevention of Terrorist Financing Risk Assessment and Policy. The company refers to the Gambling Commission guidance.

<https://www.gamblingcommission.gov.uk/guidance/duties-and-responsibilities-under-the-proceeds-of-crime-act-2002/poca-part-1-5-licence-conditions-and-codes-of-practice>

The latest version of the company Anti-Money Laundering and Prevention of Terrorist Financing Risk Assessment and Policy are available to company employees on MyMERKUR.

4. THE RISK BASED APPROACH

4.1 Risk Based Approach for Safer Gambling

The Company has implemented this Safer Gambling Policy to comply with the LCCP and has in place appropriate policies, procedures, and controls to mitigate and effectively manage the Safer Gambling risks identified. A breach of the LCCP may constitute a failure to meet the Licencing Objectives.

The required risk-based approach involves a number of steps in assessing the most proportionate way to manage and mitigate the safer gambling risks faced by the business.

These steps require the Company to:

- Identify the Safer Gambling risks.
- Design and implement appropriate policies, procedures, and controls to manage and mitigate the identified risks.
- Monitor and improve the effective implementation of these controls.
- Record what has been done and why.

The Company uses a three lines of defence model to ensure that Safer Gambling policies, procedures and controls are effectively communicated to its Employees, to provide oversight from the Venue/Cluster & Area Manager, the Safer Gambling Compliance Team, and Senior Management to identify weaknesses and provide improvements and/or remedial actions/training where necessary.

4.2 FIRST LINE OF DEFENCE

Company Employees (including Venue Managers) make up the first line of defence and are responsible for the following.

- Implementing Safer Gambling policies, procedures, and controls in venues.
- The conducting and recording of age verification checks aligned to Think 25.
- Knowing our customers and understanding their normal behavior and pattern of play, ensuring that this has been recorded.
- To ensure that all employees are aware of their responsibility in the conducting and recording of customer Interactions/Conversations.
- The monitoring of customers for signs of behavioral changes that may indicate they are beginning to show signs of gambling harm.
- Carrying out Interaction/Conversations with any customers who appear to be spending beyond a level that is affordable to them.
- Processing and guiding persons wishing to self-exclude through the relevant Industry exclusion scheme, (BACTA and Bingo Association).
<https://www.bacta.org.uk> and <https://bingo-association.co.uk>
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired and ensuring ongoing monitoring.
- Any subsequent reporting following a request from the Safer Gambling team or the Safer Gambling Compliance Manager.

4.3 SECOND LINE OF DEFENCE

The Venue/Cluster Manager and Area Manager make up the second line of defence and are responsible for the following.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed at each MERKUR slots venue.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including such breaches as identified by the Safer Gambling Compliance Manager).
- Provide oversight and guidance/advice to employees in the first line of defence.
- Ensuring that all policy, procedure, or control updates have been communicated, trained and implemented.
- The identification of any training needs or remedial actions in relation to employees (including conducting additional training for employees identified by the Safer Gambling Compliance Manager as having a specific need).
- Reviewing and evaluating Safer Gambling Interaction/Conversations completed to determine if the correct outcome was delivered.
- Ensure all employees within the venue understand how to guide individuals wishing to self-exclude through the industry self - exclusion schemes, (BACTA and Bingo Association).
- Ensure all employees in venue conduct effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired, and continue to follow up with ongoing interactions

4.4 THIRD LINE OF DEFENCE

Senior Management (including the COO, CFO, Head of IT & Head of Marketing, Head of Compliance, Head of Product, Operations Director, and the Safer Gambling Compliance Manager) make up the third line of defence as members of the Compliance Committee.

The Compliance Committee is responsible for the following.

- Setting of the Company's Safer Gambling strategy, framework, and risk appetite.
- Ensuring that the company and its Key PML/PML holders fulfil our commitments to the three licensing objectives, LCCP, and SRCP, while conducting business in a fully compliant manner.
- Reviewing breaches of Safer Gambling policies, procedures, and controls.
- Providing oversight of any high-risk customers identified in first and second lines of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees, Senior Management, and the Board by the Safer Gambling Manager.
- Reviewing any weaknesses in the Company's Safer Gambling policies, procedures and controls and the recommendations of any improvements or remedial action made by the Safer Gambling Compliance Manager.
- Ensuring that there is the correct balance between the Company's compliance obligations and commercial activity.
- The completion and submission of any minutes of meetings and reports to the Board in relation to Safer Gambling.

4.5 SAFER GAMBLING COMPLIANCE MANAGER RESPONSIBILITIES

The Safer Gambling Compliance Manager is integral to each line of defence under the Company Safer Gambling framework. Outside of the specified role of the Safer Gambling Compliance Manager (detailed in Section 6 of the Company Safer Gambling Policy), the Safer Gambling Manager is responsible for the following as part of the three lines of defence.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed by all Company Employees.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including those escalated at site level by the Manager).
- Provide oversight and guidance/advice to all Company Employees within each line of defence.
- The identification of any training needs or remedial actions in relation to Company Employees.
- Evaluate the effectiveness of Customer Interaction and Age Verification Records, including Age Verification test purchase results.

5. PROTECTION OF CHILDREN AND OTHER VULNERABLE PEOPLE

5.1 COMBATTING PROBLEM GAMBLING

The Company makes annual financial contributions, (statutory levy) to organisations approved by the Gambling Commission which between them deliver or support research into the prevention and treatment of gambling related harms, harm prevention approaches and treatment for those harmed by gambling (the full list of Gambling Commission approved organisations can be found at. <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/list-of-organisations-for-operator-contributions>)

5.2 ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS

It is an offence under Section 47(1) of the Gambling Act 2005 to permit a child (those under the age of 16) or a young person (those aged 16 – 17) to enter a gambling premise.

The Company will therefore maintain a strict approach of challenging any person who appears to be under the age of 25.

Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 25, (OC 3.2.4).

Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these. (SR 3.2.3).

This must include procedures for:

1. checking the age of apparently underage customers
2. removing anyone who appears to be underage and cannot produce an acceptable form of identification.
3. taking action when there are attempts by under-18s to enter the premises.

5.2.1 ATTEMPT OF UNDERAGE ENTRY

- Any person known to be under 18 years of age will be refused entry.
- Any person who appears to be under 25 years of age, and who has not previously provided satisfactory proof to the contrary, is challenged at the point of entry or when it comes to the attention of staff. Members of staff are trained to 'Think 25'.
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and must be provided before entry is allowed. If at any time, there is suspicion of forged documents these incidents will be recorded on Smart AML App, on the Smart Tablet and reported to the Area Manager
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. The Gambling Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizen card or validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.

- Where the person cannot produce proof of age, they must be told that they will not be permitted entry until such time as they can provide such proof.
- Those without ID will have it explained to them and be given a 'Citizen Card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Venue Manager is to take over the situation, in the absence of a Venue Manager, the Area Manager/Night Manager must be contacted to seek guidance.
- Any attempts by under-18s to enter the premises must be recorded on the Smart Age Verification app on the Smart tablet by a member of the Venue Team. Details of entry to include date, time, identity of the individual if known – or detailed description if unknown – member of staff dealing, action taken.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, display a notice prohibiting play by persons under the age of 18 years.
- If a child or young person gains access to Company premises and gambles, it is a legal requirement that only stakes are to be returned and under no circumstances are winnings to be paid. Any identified winnings will be considered forfeit and will be donated to a gambling charity. This must be recorded on Smart Age Verification app on the Smart Tablet.
- Consideration will be given to permanently excluding from our Licensed Premises any adult who has previously and repeatedly attempted to gain entry when accompanied by a child or young person or, should entry have been gained, if the offence was committed knowingly or recklessly. Notwithstanding, that adult shall be required to stop gambling immediately and told to leave the premises.
- Consideration is to be given to reminding customers of their parental responsibilities and to assess whether there is a need to develop procedures for dealing with young or otherwise vulnerable children left unattended in the vicinity of our premises.
- Employees are trained as part of their induction process in the understanding of, and the strict adherence to, this policy and accompanying log.
- Any approved visitor or contractor employed by the Company to conduct works within the Company's licensed premises must be informed that they and, or their employees must be aged over 18 years and that they may be asked to provide verifiable age-related identification before entry is permitted.
- All team members in the venue must wear a "Think 25" badge while on duty to clearly communicate to customers that we uphold a Think 25 policy.

The Company does not use any signage, promotions, or marketing materials for the purposes of gambling that would appeal to children or young people.

It is a mandatory licence requirement that the Company displays signage at each entrance stating that entry by a person aged under 18 is not permitted. Marketing materials, other information, equipment, or other decorative items must not obstruct the signage.

The Venue Manager has a responsibility to replace any signage that is worn or defaced without delay.

5.3 Gambling Management Tools and Responsible Gambling Management Information

The Company displays information both within its premises and on its website that help customers to gamble responsibly and where to seek further help and advice should they experience problem gambling or gambling related harms.

The Company displays responsible gambling information on all marketing information and notices within its premises.

Multi – Lingual Staying in Control leaflets are available for customers to take away which provide information on help and advice for problem gambling. These leaflets are available at the following locations within the premises.

- Service Desk
- Entrance
- Customer Toilets

The Venue Manager is responsible for ensuring that leaflets are available in the above locations and that enough stock is available for replenishment.

Safer Gambling cards will be issued to customers during conversations or interactions with the Venue Team and Manager.

These cards feature the following:

- Statements of support to play safely.
- National Gambling Helpline 24/7 contact number – 0808 802 0133
- Gambleaware website address and a QR code directing customers to the Gambleaware website. www.gambleaware.org

GamCare Helpline numbers and QR Code are also displayed on gaming machines, tablets, GeWeTe and ATM's. The Venue Manager has a responsibility to ensure that any stickers that are worn or defaced are replaced without delay.

The Company has 'Set Your Limit' features enabled on all its B3 category slot machines which allows customers to set time and deposit limits. These limits will default to 20minutes and £150 if the customer does not set their own limits.

5.4 Customer Interaction

The Company aims for its employees to have Interaction/Conversations with customers as part of the Customer Journey to ensure employees 'know their customers' and minimises the risk of them experiencing harms associated with gambling and takes into account the Gambling Commissions guidance, Formal Guidance under SR Code 3.4.1, Customer Interaction: Formal guidance for premises – based operators.

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators>

Social Responsibility Code Provision 3.4.1 Customer Interaction has been in force since 31st October 2019. A Safer Gambling Interaction is broken down into three parts.

- Identify – What is the behaviour, activity or trigger that has led to the interaction.
- Interact – What has been discussed between the customer and the Venue team to find out more information relating to the behaviour, activity, or trigger.
- Evaluate – What was the outcome of the interaction (follow up action where required), did the Customer understand the interaction and why did the Venue Manager /Venue Team make their decision.

The company is committed to prioritising the health and safety of our employees. When engaging in conversations with customers that may involve an interaction or self-exclusion, staff members must consider the health and safety of themselves, the customer, and other employees or customers within the premises.

5.4.1 Know Your Customer (KYC)

Identifying Customers who may be at risk of or are experiencing gambling harm at the earliest opportunity is a key factor in reducing potential or actual harm.

Venue Managers and Teams will observe Customers, interact, and record all safer gambling interaction, including any interactions where the customer declines any advice or support.

Before any safer gambling interaction/conversation is undertaken the following should be considered and reviewed,

- Any previous interactions/conversations recorded with the Customer that are relevant and the outcome.
- What information do they know about the Customer.
- Is the reason for the interaction out of character or a cause of concern in relation to the customer.
- What outcome is expected to be achieved from the interaction.

The Venue Manager and their team should familiarise themselves with the typical play patterns of their customers. At a minimum, a "know your customer" interaction or observation should be conducted, ensuring that the Venue Manager and team maintain a record of customers who frequently visit the venue.

This should be recorded on SMART interactions app on the SMART tablet with the following information:

- How many times do they come into the venue?
- What days do they come in?
- What Machines do they usually play?
- What behaviours do they usually display?
- Do they come in alone or with friends/family/partners?
- How long do they usually stay in the venue?
- What stake do they normally play?

A discussion may be necessary to reinforce any observations related to the customer's normal behaviour/play.

Examples of discussion questions below:

- Tell me what games you likeand why? – Enjoyment can be a big clue, usually customers will be happy to tell you about their favourite features etc.

- Tell me how long you usually enjoy playing for? – Helps understand what a “normal” length of play for that customer is.
- What do you like about coming here? (as opposed to other competitors) – Helps to understand if they play elsewhere i.e. where gambling sits in their life.

This sets the benchmark to identify any changes in the customers behaviour or play.

5.4.2 Identify/indicators for a change in behaviour.

Engaging with and observing customers is essential for recognising whether they may be experiencing harm related to gambling. While most of our customers play gambling at an enjoyable level, it is important for us to remain vigilant and watch for signs that indicate a shift in their usual behaviour.

You should use a range of indicators this is not an exhaustive list, but your indicators should include:

Time Indicators

How long has the customer been in your venue, and is this their usual length of play? If they typically stay for long periods, do you make an effort to check in with them periodically and engage in conversation to see how they're doing? Do you encourage the customer to take a break? Staff should be vigilant that unusually prolonged periods of play are monitored and where appropriate, steps taken to ensure that the customer is encouraged to take breaks.

Additionally, consider how often they visit, the specific days they come, and the times of their visits. Have there been any changes in their visiting patterns?

Spend

A customer might divulge their spending in the venue by talking to other customers or a member of the Venue team. Additionally, you should observe changes in the amount they stake, frequency of visits to the GeWeTe and/or ATM, and whether they are making more trips and withdrawing larger amounts of money.

Behaviour or Appearance

A customer's behaviour or appearance may change for various reasons. Pay attention if a typically quiet customer becomes more outspoken, or if someone who is usually friendly and talkative suddenly becomes subdued or adopts a different tone. Additionally, observe changes in their appearance, such as shifts in facial expressions; for instance, they might usually have a cheerful demeanor but recently appear vacant or withdrawn.

Use of gambling management tools

Gambling management tools are designed to support customers in making choices that are best for them. Encouraging customers to take a break from gaming enables them to step back and evaluate their enjoyment of the game. Informing customers about setting limits, particularly for B3 machines, empowers higher-stakes players to manage their spending and the duration of their play. Providing or distributing a Safer Gambling Card or leaflet equips customers with essential information and contact details to seek assistance if required. Self-exclusion is a voluntary program that allows customers to opt out of gambling for a period of either six or twelve months. Staff should be thoroughly trained about Gambling Management Tools and incorporate them as part of their early intervention strategies to support customer who may be at risk of suffering from gambling-related harms.

Customer – led Contact.

Customers might begin to drop hints about their spending habits or share details about their losses, often expressing frustration over their lack of winnings. In some instances, they may even claim that the machine is malfunctioning. Additionally, they may start to discuss the adverse effects of their gambling experiences.

Play Indicators

Play indicators may suggest that the customer is either increasing their stake, opting for a higher category of machines, pursuing jackpots or specific features, or switching to auto-play mode. Additionally, they might engage with multiple machines/terminals simultaneously.

A 'big win' or a windfall

When a customer wins, particularly a jackpot, the sudden increase of money may prompt them to change stakes, frequency, duration and alter their playing behaviour (as indicated by play indicators). The change in stakes could result in risks that are not directly related to wealth or resources.

- Wins of £1,000 paid out via the GeWeTe will require intervention from the Venue Manager/Team to approve pay-out and should be an opportunity to interact.

Consecutive Losses

As with all types of play, it does not necessarily follow that because a customer has lost an interaction must take place. However, there is a risk that consecutive losses could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice where 3 or more consecutive losses are believed to have occurred, the customers play will be reviewed and depending on information known regarding the customer an Interaction/Conversation will be undertaken.

Vulnerability

Life events or changes in a customer's personal situation can affect their vulnerability to gambling harm, making them more or less at risk. These changes could include factors such as bereavement, loss of income, or other circumstances (see below).

It may not always be immediately apparent to our staff when such events occur. This is why it's crucial for our teams to know our customers. By starting conversations and asking questions when there are potential signs of vulnerability, our teams can better assess whether these individuals may be at an increased risk.

Staff should be mindful of and consider factors that may make an individual more vulnerable to the risk of gambling related harms.

Factors include:

- **Personal and demographic:** if the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication, or has an addiction.
- **Situational:** if the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life changing event, or sudden change in circumstances.
- **Behavioural:** if an individual has a higher standard level of trust or high appetite for risk.
- **Market Related:** if an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market.
- **Access:** if an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

The Company has set in place a number of indicators where a customer may be exhibiting signs of harms associated with gambling.

Indicators signal when an interaction should take place, whether or not the behaviour shows a clear change.

The list below is provided as a guide but is not exhaustive:

- Changes in the nature, patterns, or levels of play.
- Changes to appearance, demeanour and wellbeing brought about through non- gambling related negative events.
- Remaining on the premises for an extended period.
- Patterns of frequent leaving and returning to the premise.
- Repeated evidence of a customer being tired and/or sleep deprived.
- Mentions frequently about losses or hints that they have been treated unfairly, irrespective of whether they wish to make a complaint.
- Mentions self-exclusion or taking a break.
- Seeking to borrow money from associates or unknowns.
- Uninterrupted gameplay across several machines and/or using Auto Play.
- A person affected by a health condition which may impair their judgement.
- Frequent use of ATMs on the premises.
- Family/partner/close friend visiting the premise to find Customer or receipt of information with respect to a concern about a customer.
- Intoxication/substance abuse or other suspected/known addictions.
- Repeated aggressive behaviour, agitation, distress, or changes which would be an indication that gambling is having a negative impact on a customer's wellbeing.
- Admission of a gambling problem or direct request for help in respect of gambling problems.

Intoxication/Substance Abuse - Where a customer is suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises the following must be actioned by the Venue Manager and staff.

- Any Customers who are suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises are required to have a safer gambling interaction/conversation with the Venue Manager/Staff and entry may not be permitted. (As with all interventions with people who may be intoxicated, the Venue Manager/Staff are required to consider the health and safety of themselves, the Customer, and other employees/Customers within the premises).
- For instances that the situation escalates, and the situation requires police assistance such as refusal to leave, the Venue Manager/Staff are required to record this on the Smart Incident App on the SMART tablet.

5.4.3 Evaluation/Oversight of an Interaction

MERKUR Slots Evaluating Interaction Process

The purpose of this process is to ensure that all employee's understand their commitment to fulfil, SR Code Provision 3.4.1.

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-remote-gambling-operators>

All PML holders understand their commitment to the LCCP 1.2.1 – Specified management offices – personal management licences, section 2, point f and section 4.

Section 2. The specified management offices are those offices, (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their responsible for:

Point f. Oversight of the day-to-day management of the licensed activities at an identified number of premises under Part 8 of the act or across an identified geographical area.

Section 4. Licensees must take all reasonable steps to ensure that anything done in performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management Licence.

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/1-2-1-specified-management-offices-personal-management-licences>

Recording, Collating & Distributing Information

Recording information

All Safer Gambling, Know Your Customer interactions, and observations must be documented on the SMART Interactions app using the SMART tablet.

The Venue Manager is responsible for ensuring their team is well-informed, properly trained, and demonstrates a clear understanding of safer gambling practices within the venue, including how and when to record interactions and observations on the SMART tablet.

Collating, Distributing, and providing feedback.

All statistics and data related to age verification, self-exclusion, incidents, breaches, and recorded interactions on the SMART hub are collected and shared with all Area Managers and Operations Directors for evaluation. The responsibility for gathering and distributing this information from the SMART hub lies with the Safer Gambling team. The Safer Gambling team will also provide feedback to the relevant Venue/Area Manager after analysing the data, focusing on the quality, information, and impact of interactions with customers.

Evaluation at Venue Level, Venue Handover

Team handover is a crucial part of shift transitions, time should be taken to discuss the customers within the venue at the time, discussing time spent in venue, any noticeable behavioural changes, and any customers that highlight concerns. Ensuring that everything is documented and brought to the attention of the Venue Manager. Interactions requiring further review by the venue manager must be clearly documented on the MS189 form within Safety Culture as part of the venue handover process.

Venue Manager/Cluster Manager Evaluation

As part of their day-to-day tasks, interactions should be reviewed that have occurred where they have not been on duty, identifying any customers that may have a cause for concern, check if any player protection tools were offered and if the actions and outcomes match the observation/conversation recorded.

SR code formal guidance, understanding the impact of the interaction on the customer include being able to look and compare, the following should be reviewed, SR Code formal guidance, 4.10 your log should include as a minimum:

- The identity or other identifier of the customer involved.
- The behaviour or the activity.
- How you/team interacted – what was said and done, and
- What happened next?

The team should receive feedback and guidance regarding this oversight. Customers requiring follow-up or outcome reassessment must have this recorded as an interaction on the Smart tablet and flagged for review by the Area Manager, as part of the monthly KPI meeting.

Area Manager, (PML) Evaluation

The Area Manager should review customer interactions and/ or randomly sample interactions that have taken place, taking the following into consideration:

- Did the Customer understand the reason for a Safer Gambling Interaction.
- Did the Area Manager feel that the customer should be offered further information/ advice in relation to problem gambling/Self – exclusion etc.
- Were other gambling management tools discussed such as the Customer reducing their visits, playing at a lower stake, or moderating spend etc.
- Was the Customer considered to be at risk of gambling harm.
- Was it determined that the Customer presents minimal risk of gambling harm as such no follow up is required.

The Area Manager should discuss this with the Venue Manager, as part of their evaluation is to give reasoning for their decision and are to clearly determine what action was taken along with any advice offered to the customer. This will be recorded on Safety Culture as part of the Monthly KPI meeting.

Operations Director Oversight

A weekly review will be conducted during the Operations meeting with the COO to address complaints involving customers identified as high risk for gambling-related harm.

Highlighted interactions from each region will be discussed to assess their impact on the customer. All reviewed complaints will be flagged to the Safer Gambling Compliance Manager and subsequently discussed on a monthly basis, either during the Compliance meeting or a designated slot at the Operations meeting.

Safer Gambling Team Oversight

To help venues understand the impact of an interaction, daily reviews will be conducted by the Safer Gambling team and feedback will be provided to the Venue Manager, with the Area Manager copied in. This feedback may include a request for additional information about the action taken, the outcome, and the impact on the customer following the interaction.

This data will be used to identify training needs, analyse common reasons for interactions, and assess whether teams are acting and following up on previous interactions.

Safer Gambling Interactions that relate to customers who may be at an increased risk of gambling harm will be reviewed by the Venue/Cluster and the Area Manager who will report any situations they feel require escalation to the relevant Operations Director and Safer Gambling Compliance manager.

The Safer Gambling Compliance Manager will report to the Compliance Committee and will consider the following as part of the evaluation process.

- The outcome and evaluation of those interactions that have been escalated to the Safer Gambling Compliance Manager.
- Are Company resources being correctly directed towards those customers that may be at risk of gambling harm.
- Any recommendations to strengthen Company safer gambling policy, identify Customers who may be at risk of gambling harm or to improve staff training.

5.5 Self-exclusion

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme.

The Bingo Association and BACTA industry schemes cover all UK land-based AGC and Bingo Licensed premises. These voluntary schemes enable customers who have identified themselves as problem gamblers to exclude from the relevant land-based sector.

A customer can self-exclude for a minimum 6 months and a maximum 12 months.

Self-exclusion is sector specific:

- BINGO Licensed Premises 'Traditional Bingo Clubs' – National exclusion zone.
- BINGO Licensed Premises 'High Street' – 1km exclusion zone.
- AGC Licensed Premise 'AGC' – 1km exclusion zone

The Company will help those who have identified themselves as having a problem with gambling or who may be suffering gambling harm by, offering enrolment into voluntary self-exclusion schemes, *(Please refer to Appendix A – Free Multi Operator/National Self – Exclusion Schemes).*

Customers who wish to voluntarily enrol into the self-exclusion scheme can do so at the premise.

The Company are unable to accept any applications to enter self-exclusion from third parties, unless in exceptional circumstances. Any applications must be directed to the Safer Gambling Compliance Manager.

Any customer that has entered a period of self-exclusion will have their marketing permissions disabled within a 48 – hour period by the Head of Marketing.

Any Customer entering a period of self-exclusion will be signposted on where to seek additional help in relation to problem gambling/gambling harm and will be advised that the following applies.

- Minimum self-exclusion period is six months and not more than 12 months.
- Any self-exclusion period can be extended by the same time period upon request.
- Following a self-exclusion period, the Customer may request for their self-exclusion period to be lifted, (the Company will not notify a customer that a self-exclusion period has, or is about to, expire).
- Following a self-exclusion re instatement request a 24hr cooling off period will apply

(Please refer to Appendix B – self – exclusion procedure flow chart – MERKUR Slots compliance manual 7.4).

5.5.1 Self – Exclusion Breach

If a customer enrolled in a self-exclusion scheme attempts to enter and are identified, they must be denied entry. The Venue Manager and the staff are responsible for regularly reviewing the Self-Exclusion carousel on the SMART tablet to stay informed about individuals who are self-excluded, especially within their local area.

The customer must be told to leave, and the breach recorded on the SMART tablet Self-Exclusion App. If the customer engages in gambling, any stakes or winnings will be forfeit, and the customer

will not be allowed to cash out. The breach must be recorded on the SMART tablet Self-Exclusion App. The breach must be reported to the Venue Manager.

5.5.2 Return from a Period of Self-Exclusion

A customer returning from a period of self-exclusion will be subject to a re-instatement interview and they will not be permitted entry until after a minimum 24 hrs cooling off period has passed.

The following questions could be asked during the re-instatement to establish an understanding of the customer as they return to gambling. Any information gathered at this point should be recorded as an interaction.

- What has changed since you self-excluded?
- What games do you enjoy?
- Why do you enjoy coming to MERKUR?
- Do you visit with friends?
- Where else do you play?
- Do you gamble online?
- What is a normal play for you?

As part of the reinstatement process, a welfare check interaction must also be conducted. This should occur during the customer's next visit or within two weeks.

5.6 Employment of Children and Young Persons

The Company does not employ anyone under the age of 18. All new employees are required to verify their age as part of the application/employment process.

5.7 Money Lending Between Customers

Whilst customers may lend money or TITO tickets to each other for the purpose of gambling, the company are required to monitor and prevent organised or systematic money lending between

individuals. Where money or ticket lending is suspected to be taking place the Venue Manager is to be immediately informed.

Any customers who are believed to be borrowing money or ticket from other customers are required to have a safer gambling interaction/welfare check with the Venue Manager. The Venue Manager must record details of the interaction/conversation, reason for customer borrowing money etc. and the outcome (ranging from continuation of gambling to being banned from entering the venue) and why they made this decision. The interaction is to be recorded on The SMART tablet.

6. FAIR AND OPEN PROVISIONS

The Company ensures that its terms and conditions are not unfair within the meaning of the Consumer Rights Act 2015.

The Company displays information on machine screens within its premises to assist customers in making an informed choice about which games they may intend to play and/or to provide further assistance if required.

The Company ensures that all gaming areas are correctly supervised. Venue Managers, Supervisors and staff conduct regular checks of both gaming and non-gaming areas to ensure the safety and security of employees and customers.

7. MARKETING

7.1 Rewards and Bonuses

Any rewards or bonuses that are offered to existing or potential customers by the Company are subject to the following rules.

- Terms and Conditions are clear and available to all customers who are offered the reward or bonus.
- The reward or bonus is not subject to the customer gambling for a predetermined length of time.
- The reward or bonus is not subject to the customer spend.

From time to time the Company will send promotional offers in the form of free plays and match plays to its customer base. Promotional offers are not based on spend.

The Company does operate a VIP scheme and as such does not offer any increased incentive or reward programs.

7.2 Alcoholic Drinks

The Company does not sell or offer complimentary alcoholic drinks to its customers in MERKUR Slots venues.

7.3 Promotion by Agents

The Company does not use agents for the promotion of any of its gambling activities or to promote its business.

7.4 Compliance with Advertising Codes

The Company undertakes all its marketing in a socially responsible manner and complies with the codes of conduct issued by the Committees of Advertising Practice, non-broadcast (CAP) and the Broadcast (BCAP) which are administered by the Advertising Standards Authority (ASA).

When conforming to the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code, <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>) particular attention is paid to the following sections;

- Section 3 – Misleading Advertising.
- Section 8 – Promotional Marketing.
- Section 16 – Gambling.

When conforming to the UK Code of Broadcast Advertising (BCAP) Code

<https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html>

particular attention is paid to the following sections.

- Section 3 – Misleading Advertising.
- Section 17 – Gambling

The Company also complies with the Gamcare Industry Code for the display of Safer Gambling information (Gambling Venues).

<https://www.safergamblingstandard.org.uk/news/new-code-of-conduct-for-land-based-gambling-venues/>

The company prevents gambling activities from being marketed/advertised or made appealing to individuals under the age of 25.

Advertising and promotional content is designed to avoid targeting younger audiences, particularly those who may be more susceptible to the risks associated with gambling.

This includes avoiding the use of imagery, language, or themes that resonate strongly with younger individuals.

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/condition/5-1-6-compliance-with-advertising-codes>

7.5 Other Marketing Requirements

The Company ensures that any marketing promotions and new media are within the meaning of the Consumer Protection from Unfair Trading Regulations 2008

<https://www.legislation.gov.uk/ukxi/2008/1277/contents/made>

All marketing material is approved by the Director of Marketing, (Key PML) and where necessary legal advice is sought.

Terms and conditions for all promotions are available to customers for the duration of each promotion. Terms and conditions can be viewed both on the premises and websites.

The Company ensures that no marketing information or promotions are displayed on materials that are for the purposes of safer gambling.

7.6 Direct Electronic Marketing Consent

Upon initial registration for voluntary membership all customers are asked to give their consent to receive marketing and promotions by post, email, text, and social media. The default setting is for no permissions to be set and only customers who give consent (completing a privacy card) will have these permissions enabled on their profile.

All Customers who receive marketing or promotional contact can unsubscribe at any point.

Further information relating to the Privacy and Electronic Communications (PECR) are available on the Information Commissioners Office (ICO) website <https://ico.org.uk>

8. COMPLAINTS AND DISPUTES

The Safer Gambling team is dedicated to offering guidance and oversight to operations when a complaint is identified as a safer gambling concern. They will adopt a risk-based approach, assessing the details of the complaint and the operations investigations before recommending the appropriate course of action for operations to consider.

The Company's written complaints procedure is available as a separate leaflet. Slots venues operate a 4 stage complaints procedure as below, *(please refer to Appendix C Complaints and Disputes Policy leaflet)*.

8.1 Alternative Dispute Resolution

The Company has a mechanism in place for customers to refer gaming disputes to a recognised Alternative Dispute Resolution (ADR) provider. The Companies approved ADR provider is the Independent Betting Adjudication Service (IBAS www.ibas-uk.com) which is free of charge to customers and approved by the Gambling Commission.

A complaint as determined under the LCCP relates to licensed activities for the outcome of a gambling transaction or a concern over how the Company conducts its gambling business.

Dispute as determined under the LCCP is the non-resolution of a customer complaint which has not been resolved by the Company.

Only disputes of a gambling nature can be referred to IBAS. The Company will address Customer complaints within 8 weeks following receipt.

8.2 Non-Gambling Related Customer Complaints

Customers from time to time may wish to complain on issues relating to service (non- gambling)etc. These complaints will not qualify for ADR and will be dealt with internally by the Company via the Customer Care platform:

- Customer Complaint procedures are available for customers in the premise.
- Customer Care details are displayed on the Customer Information Board and via the company website.

Please refer to the Company Complaint Handling policy.

9. COMPANY EMPLOYEES

9.1 Responsible Gambling Information for Employees

Employees are encouraged to report any issues they are experiencing in relation to safer gambling as soon as possible to ensure that the Company can provide both the correct and the right level of advice/support that is required.

The company provides a confidential Employee Assistance Programme (EAP), for free information, support, and counselling – available on the Happi App and Further Information is provided on MyMERKUR.

The Company does not permit its employees to gamble within any of its premises.

10. SENIOR MANAGEMENT RESPONSIBILITY

10.1 Compliance Committee

For the purpose of the Company Safer Gambling Policies, Senior Management means individuals within the Company with sufficient knowledge of the Company's Safer Gambling risks and with sufficient authority to take decisions that affect the Company's exposure to Safer Gambling risk. The Company has determined that members of Senior Management will make up the Compliance Committee and will report to the Board.

The Compliance Risk Committee will be chaired by the Head of Compliance and will include the COO, the CFO, Safer Gambling Compliance Manager, Operations Directors, Head of Product, Head of Marketing, Head of IT. In addition, there is a group Compliance Committee that meet quarterly which is attended by the Chief Executive Manager, Group Compliance Director, and the Company Licensing Advisors, Poppleston Allen. The Compliance Committee makes up the third line of monitoring in the Company's risk-based approach for protecting its customers against the risks of gambling related harms.

The Head of Compliance will chair the Compliance Committee meetings and as such they will set agendas and complete minutes.

10.2 Company Safer Gambling Obligations

The Safer Gambling Compliance Manager and the Head of Compliance will provide monthly (calendar), quarterly (calendar) and annual (calendar) reports to the Compliance Risk Committee covering the Company's operation and effectiveness of the systems and controls in place relating to Safer Gambling and will take any action necessary to remedy deficiencies identified by the report in a timely manner. The quarterly and annual reports will set out the following.

- Safer Gambling risks to the Company and/or its customers/employees that are either new/emerging or have changed.
- Remedial action identified through deficiencies or Company Safer Gambling weaknesses.
- Improvements to be made or progress reports on previous measures.
- Internal and independent audit results.
- Interactions with the Gambling Commission or other external bodies.
- Any key notifications (regulatory changes/guidance) from the Gambling Commission or other industry bodies complete with an explanation/interpretation, effects on the company operations/employees'/ customers and any further recommendations.
- Senior Management and Relevant Employee Safer Gambling training.
- Safer Gambling resource considerations or concerns.
- Any other relevant information at the discretion of the Safer Gambling Compliance Manager.

10.3 Policies, Procedures and Controls

The Company has in place policies, procedures, and controls to mitigate and manage the Safer Gambling risks that have been identified. The Company Safer Gambling policies, procedures and controls are.

- Proportionate to the size and nature of the business using guidance issued by the Gambling Commission (and other relevant bodies such as The Bingo Association)
- Approved by the Head of Compliance and are submitted to both the Compliance Committee, the Board and Group Compliance.

10.4 Safer Gambling Training

MERKUR Slots is fully committed to delivering the highest standards in regard to Safer Gambling. The company provides training to its employees to ensure they both understand the culture of the company and their personal responsibilities in relation to safer gambling. Safer Gambling training is undertaken upon commencement of employment and on a six-monthly refresher basis (safer gambling training is delivered by e learning, remote workshops and face to face training session).

10.4.1 Management Teams Role

The Management Team has a key role to play in Safer Gambling Training:

- Show dedication to supporting any training initiatives that promote Safer Gambling.
- Ensure that Safer Gambling and Compliance Training plans are focused on organisational needs at corporate and service level and provide adequate resources.
- Ensuring Safer Gambling actions are evaluated, in relation to customer experience and the benefits clearly identified.

The Safer Gambling Support Officers role is to:

- Facilitate the effective evaluation of Interactions and feedback to appropriate managers.
- Organise specific support to venues.
- Complete and deliver annual refresher workshops on statutory areas.
- Instruct/train and coach teams to improve and embed a Safer Gambling culture within the operation.
- Design specific training activities to support and reinforce Safer Gambling practices.

Area Manager, Cluster Managers and Venue Managers main areas of responsibility are to:

- It is the Venue Managers responsibility to ensure that all employees receive Safer Gambling Training both upon commencement of employment and as a refresher on a minimum six-monthly basis throughout employment with the Company.
- Carry out on the job instruction and coaching.
- Make all employees aware of any updates of policy & procedures and identify how this will become working practice.
- Ensure that those who are trained share their learning with others wherever possible and appropriate.
- Evaluate the effectiveness of Safer Gambling and compliance events/ training workshops in relation to working practices and customer experience.
- Ensure all new employees are aware of their responsibility toward safer gambling and compliance

The individual employee's role is to:

- Implement and demonstrate Safer Gambling knowledge and practices into the customer experience and workplace procedures.
- Share learnings with colleagues wherever possible and appropriate.
- Ensure an effective handover with colleagues by communicating all relevant information, interactions, and observations from their shift.
- Takes ownership and responsibility for Knowing your customer, contributing to the customer experience, and promoting safer gambling practices.

10.4.2 Areas of Safer Gambling and Compliance Training

Safer Gambling and Compliance training at MERKUR Slots is divided into three sections:

Induction/MERKUR Slots workbook/Training Resource Pack

Each new employee should be provided with information and instruction about Safer Gambling and Compliance. The aim of this awareness is to enable the new starter to gain knowledge and be at an adequate level in their new working environment and be effective in role:

Safer Gambling and Compliance subjects are included in VM Guide/Workbook and Training Resource Packs supplied by Learning and Development department.

Face to Face Training

Induction, Awareness workshops, Events, Knowledge checks and Follow Up.

These face-to-face sessions will be tailored to identified Safer Gambling and Compliance training needs, and will be conducted as part of refresher training, or as weekly or monthly follow-ups:

- How Much is too much.
- Safer Gambling interaction, Observation and Conversation workshop.
- Evaluating Interactions and conversations follow up session by Area.
- Self-Exclusion, Reinstatement and Breach Guide
- Annual PML Event.
- Cluster Manager Training – Responsibilities as a PML holder.
- Awareness workshop on updates to Policies and Procedures.

Online Training

On- line training is used at induction and for biannual and annual re-fresher training, the following are on – line training courses:

YGAM

- Enhanced Interaction Skills – External provider

Litmos

- Essentials of Compliance
- Age Verification
- Safeguarding Children and the Vulnerable
- Customer Interaction

I Gaming – Key PML/PML Holders

- AML/CFT Foundations
- AML/CFT British Regulations
- RG Foundation
- RG British Regulations
- Advertising Codes of Practice
- Ant – Bribery
- Licence Conditions and Codes of Practice

Record of Training

All online training is recorded on our internal systems and the responsibility for the maintenance of these records are with the Learning and Development department. Face to face Safer Gambling compliance training records will be maintained by the Safer Gambling Compliance team.

All Safer Gambling training will be developed and overseen by the Safer Gambling Compliance Manager, with regular reviews and updates to align with legislation and Gambling Commission guidance. Employees will be made aware of these updates as follows:

- The Safer Gambling risks applicable to the Company's customers and how these risks are managed.
- Identifying behavioral changes which may indicate a customer is at risk of Gambling harm.
- Identify Customers at risk of Problem Gambling or Gambling Related Harm.
- Legal requirements of children and young people accessing company premises
- The Customer interaction process.
- Industry Self-Exclusion Scheme.
- Fair and Open provisions.
- The Customer Dispute process.
- The role and responsibilities of the Safer Gambling Manager.

The Internal Audit Team also attend Safer Gambling Interaction and Evaluation workshops to support their Compliance audit assessments.

11. THE SAFER GAMBLING COMPLIANCE MANAGER

11.1 Role of the Safer Gambling Compliance Manager

The Company has appointed a Safer Gambling Compliance Manager who is responsible for:

- Reviewing Safer Gambling documentation that has been collected/completed.
- Reviewing Safer Gambling interactions that have been completed by Venue Managers and staff in line with Company auditing procedures.
- Examine the oversight and any results presented by the Area Manager to confirm that the outcome aligns with the information documented in the interaction.
- Offer advisory insights and recommendations regarding actions and outcomes to the Operations Directors team during the evaluation of potential high-risk customers.
- Being the company point of contact with anything related to Safer Gambling.
- Preparing Safer Gambling training materials for all Company Employees and ensuring face-to-face Safer Gambling training is delivered for Senior Management, Managers and Head Office Employees and ensuring that online Safer Gambling training is relevant.
- Collating, preparing, and presenting Safer Gambling reports on a monthly, quarterly, and annual basis to the Compliance Committee (and where required the Board).
- Providing additional support to the Head of Compliance, or other areas of the business as determined by the Head of Compliance or were identified by the Safer Gambling Compliance Manager.

11.2 Standing of the Safer Gambling Compliance Manager

The Company has determined that the Safer Gambling Compliance Manager is responsible for the oversight of all the Company's Safer Gambling activities and is the key person relating to Safer Gambling.

The Safer Gambling Compliance Manager has.

- The authority to act independently in carrying out their Safer Gambling responsibilities (relating to the LCCP).
- Has the necessary seniority within the Company and the resources/information to discharge their duties in an objective manner which may conflict with short term operational concerns.

In the temporary absence of the Safer Gambling Compliance Manager Safer Gambling responsibilities will be undertaken by the Head of Compliance.

In the temporary absence of Safer Gambling Compliance Manager (due to holidays/absence etc.) Safer Gambling responsibilities will be undertaken by the Safer Gambling Support Officer.

11.3 Safer Gambling Support Officer

The Company has appointed a Safer Gambling Support Officer to assist the Safer Gambling Compliance Manager in these areas:

- To promote awareness of Safer Gambling strategies and procedures, to all venues, through follow up meetings with all Area's.
- Conduct dip sampling and engage in discussions with Area and Venue managers to thoroughly explore all avenues and options available for the customer, ensuring the best possible outcome is achieved.
- Supporting the Safer Gambling Compliance Manager to develop a programme of Safer Gambling and Compliance training for all support functions and the customer facing teams.
- Ensure employees in all areas of the business are trained and aware of their responsibilities regarding Safer Gambling.
- Keeping abreast of Industry Safer Gambling initiatives and changes in legislation, understanding and benchmarking of best practice with the aim of continuously raising standards and expertise.
- Monitoring and evaluation of Safer Gambling practices.
- Attend Compliance Committee Meetings as required.

11.4 Safer Gambling Support Analyst

The company has appointed a Safer Gambling Analyst to provide support to the Safer Gambling compliance manager in the following key areas:

- Perform analysis and produce reports from the Compliance Backoffice data capture system
- Review and evaluation of Safer Gambling Interactions
- Identify and communicate shortfalls in Safer Gambling Interactions, age verification and incident reporting.

Add commentary about escalation where there is a risk identified customer complaints SG related.

11.5 Regional Compliance Support Officers

The company has appointed four Regional Compliance Support Officers, who will report to the Safer Gambling Compliance Manager while providing support to operations in the following areas:

- To promote awareness of Safer Gambling strategies and procedures.
- Oversight and support for operations to ensure compliance with Regulatory and LCCP obligations, covering ordinary and SR code, AML requirements and Licensing Conditions.
- Responsible for ensuring venues within their area have updated Local Area Risk Assessments.
- Conduct checks that align with our internal audit processes.
- Supporting with customer complaints.
- Engagement with local authority compliance officers.
- Marketing oversight in venue, ensuring the correct messaging within our venues.
- Regularly observe venue practices during trading hours, paying close attention to team interactions with customers, and provide constructive feedback based on observations.
- Ensure that employees in venues are adequately trained and fully aware of their responsibilities. This includes identifying any knowledge gaps and conducting training needs analysis as necessary.
- Monitoring and evaluation of Safer Gambling practices.

12. Gaming Machine Notices, Messaging and Setting Your Limits

The following notices are a requirement by law to be displayed on all Gaming Machines in the venue. This can be on the screen of the machine or displayed on a sticker affixed to the cabinet.

- No under 18's to play
- Gambling Responsibly (Gamcare UK Help line 0808 8020 133)
- Minimum Percentage Payout
- Machine category – (either Legacy or Non – Legacy).

The company has a standard safer gambling message which is displayed on all digital based machines where possible.

12.1 Setting Limits

Customers can choose to set their own limits of time and deposits on our B3 Gaming Machines.

Blueprint Machines – Customers can choose to set their own limits on any Blueprint B3 machine by choosing the set limits option at the bottom of the menu. The Set Limits screen will also show up as soon as any money is deposited into the machine.

Customers can choose between setting a time limit or a deposit limit. Times can range from 1 minute up to 20 minutes and deposits can be set from £1 up to £150. If a customer chooses not to set a limit the machine will still flash up a reminder every 20 minutes or for every £150 deposited into the machine as a default limit.

If a customer has set a limit and they exceed this, a reminder screen will pop up. This allows the customer to withdraw any funds deposited over the agreed limit, continue with any default settings, no limits, or allows the customer to reset the limits. This screen will stay in view for 30 seconds for the customer to contemplate their choices.

Equinox/Clarity Machines – Customers can also set time or deposit limits on the **Equinox/Clarity** B3 cabinets by selecting the green SET LIMITS button at the bottom of the main screen.

Default limits are set on the machine for 20 minutes or every £250 that is inserted into the machine. Customers may also choose their own limits ranging from 5 minutes to 180 minutes or £1 up to £10000. The machine will pop up with a reminder at 20-minute intervals or when multiples of £250 have been inserted into the machine.

The customer can choose to stop playing, continue with default limits or collect any excess money inserted and continue to play. Once an option has been selected there is a 25 second cooling off period before play can resume or the customer can choose to withdraw their funds at this point.

The Company makes available Gaming Machines within its licensed premises where there are substantive facilities for non-remote premise games. All gaming areas are appropriately supervised by staff.

13. ASSESSING LOCAL RISK

13.1 Local Risk Assessment

The Company has in place Local Area Risk Assessments for each of its premises. Each Risk Assessment considers identified risks that are associated with the provision of gambling and the policies/procedures that the Company has in place to mitigate these identified risks.

Each Local Risk Assessment considers matters identified in the relevant licensing authority's statement of licensing policy.

The Head of Compliance and Internal Audit team will review the local risk assessments and will update where necessary (at least on a yearly basis or where a notable change has been identified).

The latest version of the Local Area Risk Assessment is retained in each venue

14. ONGOING MONITORING AND AUDITING

14.1 Monitoring Techniques

The Company uses various techniques to monitor Customers. The list below is non-exhaustive:

- Monitoring customer activity on machines, observing customer behaviour during regular venue walkarounds, offering refreshments, engaging with customers, and ensuring that all relevant Safer Gambling interactions are completed accurately. Additionally, any customers of concern will be reported to the Venue and Area Manager.
- Monitoring customer behaviour's and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any customers of concern are reported to the Venue and Area Manager.
- Venue Managers to review Safer Gambling Interactions providing rationale for decisions made, ensuring they are recorded correctly. Further to this providing oversight of employees, ensuring training is up to date, reviewing breaches/exceptions to Safer Gambling policy and forwarding information to the Safer Gambling Compliance Manager.
- Area Managers to review Safer Gambling Interactions on a regular basis.
- Safer Gambling Compliance Manager to review Safer Gambling documentation, outcomes and rationale for decisions made and Company documentation

14.2 Regulatory Compliance Audits

The Company Internal Auditors conduct unannounced Regulatory Compliance audits to ensure both the Company, and its employees are compliant with legislation, LCCP and Company policy.

15. ANTI-MONEY LAUNDERING AND SAFER GAMBLING

It is important to be aware that while some Customers may display signs that they may be engaged in some form of money laundering activity, the signs may also be an indication of problem gambling.

For instance, a customer whose playing habits increase may be chasing losses, rather than engaging in money laundering activity. Similarly, there may be occasions whereby a customer may be a problem gambler, but in fact, may be spending the proceeds of crime.

Whatever the circumstances, Venue Managers must be prepared to engage with the customer and ask pertinent questions to satisfy themselves, as to whether the Company shall commence or continue with the business relationship with the Customer or terminate it. In summary, it is perfectly plausible that an individual attempting to spend criminal proceeds or launder money could also be a problem gambler, but one does not necessarily follow the other.

The effective identification and management of these risks rests upon the ability to have a comprehensive knowledge of customer relationships and upon Venue/Cluster and Area managers having a clear understanding of their responsibilities.

Appendix A – Free Multi Operator/National Self – Exclusions Schemes

Free Multi Operator/National Self-Exclusion Schemes

This page provides a brief explanation of the multi operator gambling self-exclusion schemes that are available for free to people in Great Britain.



Online Gambling (via websites/apps)

GAMSTOP helps you put controls in place to restrict your online gambling activities. Once registered, you will be prevented from using any gambling websites and apps run by companies licensed in Great Britain, for a period of your choosing.

www.gamstop.co.uk

Land Based Gambling (in premises)



Betting Shops

Call the MOSES help line to self-exclude from multiple bookmakers in your area.

Freephone: 0800 294 2060

www.self-exclusion.co.uk



Casinos

SENSE self-exclusion programme offers self-exclusion from all licensed land based casinos in Great Britain. Register in person anytime at a casino venue or to enrol by email contact

Info@sensescheme.com

www.sensescheme.com



Bingo Premises

The Bingo Industry Self-Exclusion Scheme (BISSES) offers self-exclusion from all licensed land-based bingo premises across Great Britain. You can register either in-person at a licensed bingo venue or by telephoning the venue directly.

www.bingo-association.co.uk/self-exclusion



Adult Gaming Centres/High Street Arcades/ Motorway Service Areas/ Family Entertainment Centres

If you want to self-exclude from one or more Adult Gaming Centres, High Street Arcades, Motorway Service Areas and Family Entertainment Centres with age-controlled sections in your area for up to 12 months, you can do so in person at the venue, by telephoning the venue or by telephoning BACTA on 020 3930 9769 Monday to Friday between 9am and 5pm.

www.bacta.org.uk/self-exclusion



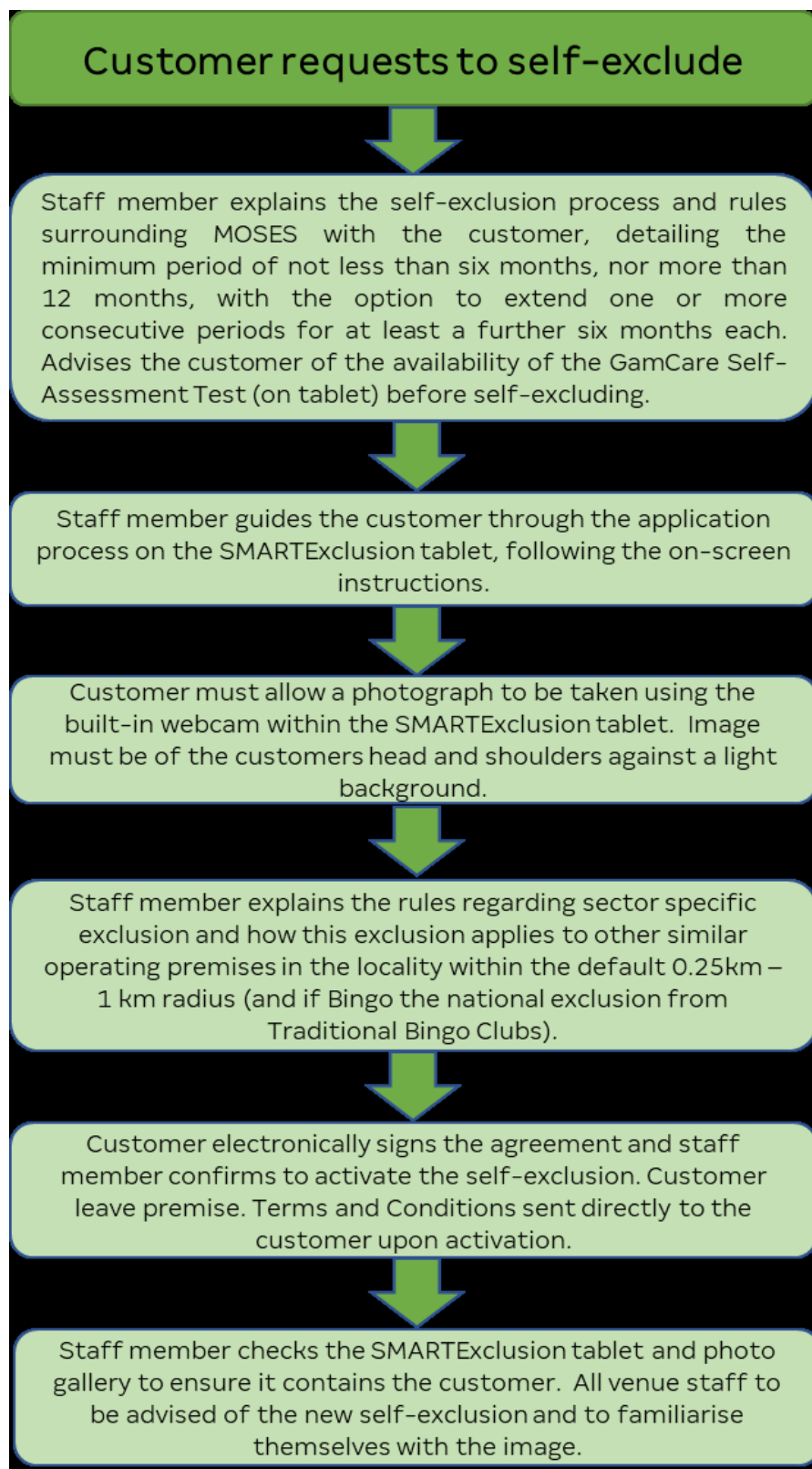
High Street Bingo/Motorway Service Areas/Holiday Parks

If you would like to self-exclude from High Street Bingo premises, Adult Gaming Centres, or both at once, you can do so using SmartEXCLUSION. This is easy to do in person at a premises or by calling our support line on 0844 884 3433.

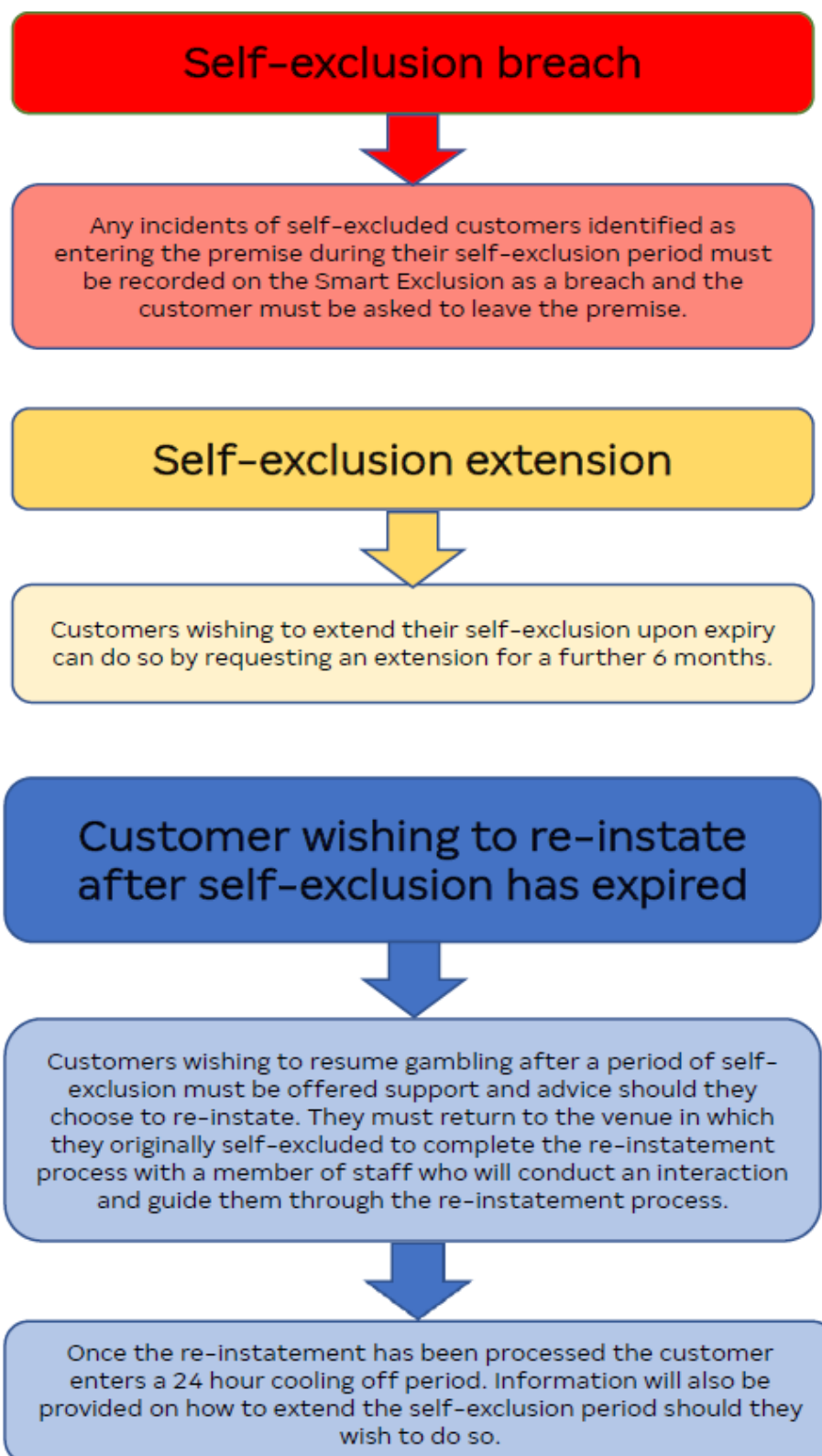
www.selfexclusion.com

Last updated: April 2022

Appendix B – Self Exclusion Flow chart



Appendix B – Self – Exclusion Flow Chart continued



Appendix C – Complaints and Disputes Policy

COMPLAINTS & DISPUTES POLICY

At MERKUR, we aim to provide our customers with the very best high street venue experience. We appreciate that sometimes things may not meet our high standards.

Our teams in venue will aim to resolve the issue for you there and then. We have a four stage process to resolve your issue.

- Stage 1:** In the first instance your issue will be escalated to the Duty Manager to discuss with you.
- Stage 2:** If the Duty Manager is unable to resolve the issue, they will advise you of this and the matter will be referred to the Area Manager for action. We understand a timely response is essential to your experience and our aim is to contact you within 7 days.
- Stage 3:** If the matter requires further attention, it will then be referred to the Operations Director. We hope at this point we can reach a satisfactory outcome and you can continue to enjoy our venues.

- Stage 4:** If your complaint is solely relating to betting or gambling activity, and after our internal complaints process you are unhappy with our resolution, you can submit in writing to the independent third-party alternative dispute resolution provider: IBAS (Independent Betting Adjudication Service).

IBAS (Independent Betting Adjudication Service)
P.O.Box 62639
London
EC3P 3AS

If you wish to contact us directly, the quickest way to do this is via our online Customer Care:



<https://customercare.merkurcasinouk.com/>

Here you can find help if anything has affected your experience, submit feedback, and manage the status of your complaint.

Alternatively, you can reach us:

• In writing:

**Customer Care,
MERKUR Casino UK,
Second Floor,
Matrix House,
North Fourth Street,
Milton Keynes
MK9 1NJ**

• By phone:

01908 351265 (Please note this an automated phone service)

Version 2.0



BeGambleAware.org®



BeGambleAware.org®



Appendix D – Help with Problem Gambling

Help with problem gambling

Being a problem gambler can harm your health and relationships and leave you in serious debt. If you have a problem with gambling and you'd like to stop, support and treatment is available.

[Click to read our Responsible Gambling Guidelines](#)

Are you a problem gambler?

Try this questionnaire:

- Do you bet more than you can afford to lose?
- Do you need to gamble with larger amounts of money to get the same feeling?
- Have you tried to win back money you have lost (chasing losses)?
- Have you borrowed money or sold anything to get money to gamble?
- Have you wondered whether you have a problem with gambling?
- Has your gambling caused you any health problems, including feelings of stress or anxiety?
- Have other people criticised your betting or told you that you had a gambling problem (regardless of whether or not you thought it was true)?
- Has your gambling caused any financial problems for you or your household?
- Have you ever felt guilty about the way you gamble or what happens when you gamble?

Score 0 for each time you answer "never"

Score 1 for each time you answer "sometimes"

Score 2 for each time you answer "most of the time"

Score 3 for each time you answer "almost always"

If your total score is 8 or higher, you may be a problem gambler.

Help for problem gamblers

There's evidence that gambling can be successfully treated in the same way as other addictions. [Cognitive behavioural therapy](#) usually has the best results.

Treatment and support groups are available for people who want to stop gambling:

GamCare

[GamCare](#) offers free information, support, and counselling for problem gamblers in the UK. It runs the National Gambling Helpline (0808 8020 133) and also offers face-to-face counselling. National Problem Gambling Clinic

If you live in England or Wales, are aged 16 or over and have complex problems related to gambling, you can refer yourself to this specialist NHS clinic for problem gamblers. See if you meet the [criteria for this service](#).

Gordon Moody Association

The [Gordon Moody Association](#) offers residential courses for men and women who have problems with gambling – email help@gordonmoody.org.uk or call 01384 241292 to find out more. It also runs the [Gambling Therapy website](#), which offers online support to problem gamblers and their friends and family.

Gamblers Anonymous UK

[Gamblers Anonymous UK](#) runs local support groups that use the same 12-step approach to recovery from addiction as Alcoholics Anonymous. There are also [GamAnon](#) support groups for friends and family.

NHS Northern Gambling Support Service

The NHS Northern Gambling Service gives compassionate support, along with understanding and a determination to make life better as quickly as possible. They specialise in delivering support and treatment for gambling-related harms, as well as taking a holistic approach which may mean addressing mental health problems.

<https://www.northerngamblingservice.nhs.uk/>

Self-help tips for problem gamblers

Do:

- pay important bills, such as your mortgage, on payday before you gamble
- spend more time with family and friends who don't gamble
- deal with your debts rather than ignoring them – visit the [National Debtline](#) for tips.

Don't:

- view gambling as a way to make money – try to see it as entertainment instead
- bottle up your worries about your gambling – *talk to someone*
- take credit cards with you when you go gambling

For more self-help tips, see the [Royal College of Psychiatrists website](#).

If you're affected by someone's gambling

If you're having problems because of another person's gambling, it's best to be honest with them about it. They need to know how their behaviour is affecting you.

Support is also available to people who are worried about someone else's gambling:

Gamcare offers [support and information for partners, friends, and family](#) of people who gamble compulsively.

Real stories of recovery from gambling

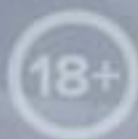
Tell your own story and post messages of support in the [GamCare recovery diaries forum](#).



MERKUR SLOTS



No Smoking



Over 18s Only



No Alcohol



CCTV

THINK

25

If you are lucky enough to look under 25 years of age, we need to check your ID.

Please do not be offended.

Acceptable forms of ID are:
Driving Licence, Passport, Citizen Card.

18+ BeGambleAware.org   

PLAY SENSIBLY PLAY ENJOYABLY PLAY AFFORDABLY



PLAYING THE MACHINES

Staying in Control

If you feel you are in difficulty with your gambling or know someone who is and would like help,

Call the National Gambling Helpline:

0808 8020 133



JOCUL LA APARATE:
CUM SĂ DEȚINEȚI CONTROLUL



LOJA ME MAKINERITĚ:
TĚ JESH NĚ KONTROLL



玩角子老虎机时：
保持克制



GRAJĄC NA AUTOMATACH:
NIE TRAC KONTROLI



ИГРАТЬ НА ИГРОВЫХ АВТОМАТАХ
ДЕРЖАТЬ СЕБЯ В РУКАХ



**A JÁTÉKGÉPEKEN
VALÓ JÁTSZÁS:**
MEGTARTANI A KONTROLLT



ИГРА НА РОТАТИВКИ: НЕ ГУБЕТЕ
КОНТРОЛ



मेशनिहरू खेलनु नयिन्त्रणमा रहनुहोस्



MAKİNELERDE OYNARKEN:
KONTROLÜ ELİNİZDE TUTUN



**JOUER AUX MACHINES À
SOUS :** GARDER LE CONTÔLE



JUGAR CON LAS MÁQUINAS:
MANTENER EL CONTROL



**NUTZUNG VON
SPIELAUTOMATEN:**
DIE KONTROLLE BEHALTEN



HRANÍ NA AUTOMATECH:
MĚJTE TO POD KONTROLOU

18+

BeGambleAware.org



PLAY
SENSIBLY

PLAY
ENJOYABLY

PLAY
AFFORDABLY



**MERKUR
SLOTS**
383

CALCULATING THE RISK

Gambling is a fun and exciting form of entertainment, which provides an enjoyable experience.

Playing slot machines is an attractive way of taking a risk as long as the risk taking is kept under control.

The great majority of people who play slot machines or gamble in other ways enjoy the experience without any problems, but a very small number lose control of what they are doing.

For these players it ceases to be fun.

Their life can be dominated by gambling.

PROBLEM GAMBLING

Problem gamblers will continue playing whether winning or losing.

They will use their own and other people's money in order to keep playing. As gambling takes over their life, many other things can suffer: family life, their job and other interests.

Gambling becomes a problem when you:

- Gamble until all your money has gone.
- Borrow or steal money to continue gambling.
- Gamble to chase your losses.
- Neglect other interests, family and friends to gamble.

CHECKING IT OUT

Someone who thinks they have a gambling problem should ask themselves if:

- They lose time from education or work because of gambling.
- They gamble to get money to pay debts or solve financial difficulties.
- After losing they feel they must return as soon as possible to win back losses.
- They gamble until their last pound is gone.
- They borrow to finance their gambling.
- They are reluctant to use "gambling money" for normal expenditure.
- They have ever committed, or considered committing, an illegal act in order to finance their gambling.
- They have ever considered self destructive behaviour as a result of their gambling.

WHO CAN HELP?

If you are in difficulty with your gambling or know someone who is, and would like help, call the GamCare helpline:

GamCare: 0808 8020 133

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling.

The national helpline is answered by trained staff. They can offer counselling, information and advice to problem gamblers, family members and to friends of a gambler. Information regarding counselling for problem gamblers is available on request.

STAYING IN CONTROL

**Whenever you play machines
it is wise to remember that :**

- You are buying entertainment, not investing your money
- You should only spend money you can afford to lose.
- In advance of playing you should set strict limits on how much you will spend
- Problems will arise if playing machines becomes the most important part of your life
- Playing should take up only a relatively small amount of your time and interest
- Playing within your means is likely to be fun and exciting
- Spending outside your means is likely to create problems for you and others.
- You shouldn't play to escape from worries or pressure

5.1 Money Laundering

INTRODUCTION

The MERKUR Money Laundering policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

LCCP 12.1.1 – Anti-money laundering – Prevention of money laundering and terrorist financing.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the “POCA”) and the Money Laundering and Terrorist Financing Regulation 2017 (“the Regulations”). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 10th January 2020, new money laundering regulations came into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered “Low Risk”, this does not mean that there is “no risk” within our trading sectors.

As a result of this legislation Merkur Casino UK brands are required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a “risk based” approach.

MONEY LAUNDERING DEFINITION

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of, or suspect, the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and High Street Bingo (HSB), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

MONEY LAUNDERING POLICY

Brands operating under Merkur Casino UK are committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Merkur Casino UK has detailed a Money Laundering Policy available to all employees on MyMERKUR and has appointed a designated Money Laundering Reporting Officer

(MLRO), Mrs. Amanda Kiernan. Email: AKiernan@merkur-casino.com

5.1 Money Laundering

The deputy MLRO is – Mark Wells. Email: mwells@merkur-casino.com

All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. **All venues** need to report any suspicious cash transactions **of any** note denomination value, including stained/dyed notes, and foreign coins to the value of **£50 during one machine empty or cash collection**. These incidents should be reported using the “(AML) ANTI MONEY LAUNDERING” app available on the Smart tablet. An automated alert will be sent to the Money Laundering Reporting Officer for the purpose of informing the relevant authorities.

DISCLOSURE PROCEDURE

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Reporting Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the “(AML) ANTI MONEY LAUNDERING” report available on your SMART tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Reporting Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

CASH HANDLING

Operating policies and procedures are in place regarding accounting practices and record keeping in respect of: –

- Monetary stakes introduced to machines (gross takings where available).
- Promo ticket transactions.
- GeWeTe payouts exceeding £1k approval.
- Customer refunds due to machine malfunctions.
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds.

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to the effect retaining a copy for their future reference. The original is retained on the employee's personnel file.



Both violence and aggression can be indicators of distress, to gain dominance and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
Instinctive	The best defence is attack!
Learned Behaviour	Aggression is sometimes part of the behaviour we have learned from society.
Energy Source	Natural release of pent-up instinctual energy – a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way, society accepts and rewards.
Frustration Response	When frustration in an individual reach's certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age.
Psychological	Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGGRESSIVE OR VIOLENT PERSON

There are tell-tale signs, so the key thing is to observe the customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour. These are some of the signs that can help in predicting the likelihood of imminent violence:



- Muscles tensed?
- Facial expression?
- Agitated?
- Pacing about?
- Withdrawn on approach?
- Voice – change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing – increase in respiration?
- Tearful?

PROCEDURE

Quite simply whenever there is an incident you should adopt the HEAT approach:

- H Hear the customer – listen to their complaint or issues.
- E Empathise – see to understand the problem.
- A Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.
- T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: –

- Be alert and consider if you need further assistance.
- Control your behaviour in body language, feelings, and expression.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move.
- Consciously lower pitch and volume of voice.
- Speak clearly and slowly and do not stop talking because the other person does not answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and offer help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation – buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue!
- Do not give orders.
- Never make promises you cannot keep.
- Do not disagree unless necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.



During conversation with the person being confronted use expressions such as:

- "I know you have a problem",
- "I know you are upset",
- "I believe you when you say something is wrong."
- Remember.... Keep your voice at a calm, even level.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague if the person becomes abusive in their language or behaviour they should be asked to leave immediately.

(Remember to refund their stake money). If they refuse to leave, then assistance from management or the police should be sought.

PREVENTING EMPLOYEES FROM BEING ABUSED

Under no circumstances should employees put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked, a manager should be called. If the customer is still aggressive and still refuses to leave the premises, then the police should be called.

At no time should employees intervene physically in the removal of an individual from a site. All incidents should be fully recorded on the Smart Tablet Incident log and, where appropriate as an Interaction/conversation on Maxim.

DE-ESCALATION TRAINING

To support employees in dealing with an aggressive customer Merkur Slots has a programme of de-escalation training which is rolled out to all senior Slots employees.

5.2. Keeping Alcohol & Drugs Out

At Merkur Slots we have clear rules on the consumption of alcohol and guidelines to manage individuals found to be under the influence of excessive alcohol consumption or use of drugs.

It is the duty of all licensed premises to create a safe and secure environment for their customers and to take steps to promote the below licensing objective:

- Keeping crime out of gambling.

It is therefore vital that all licensed premises remain vigilant when it comes to illegal drugs.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL/DRUGS ON ENTRY

In all venues, individuals who are deemed to be under the influence of excessive alcohol or drugs must be prevented from entering. Employees are trained to identify the potential signs of someone who is under the influence of excessive alcohol or drug use.

PROCEDURE

When such a situation occurs, an employee should politely refuse entry to the site on the grounds of being under the influence and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the employees on duty, the police should be called to assist.

All incidents should be recorded fully on the Smart Tablet Incident App and, where appropriate as an Interaction/Conversation on Maxim.

ALCOHOL CONSUMPTION ON SITE

Slots Venues

Alcohol is not available for purchase or offered free in any Slots venue and customers must not bring alcohol onsite to be consumed.

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Cameras angles are never changed without the correct authority. The security of the venue is increased.

Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorisation causing a loss of coverage of key areas. The security of the venue is compromised.

What:

- The CCTV system must be switched on and recording at all times
- Any faults with the CCTV System should be communicated to the Area Manager immediately, as well as the IT department
- CCTV should always cover: the front and rear exits, all machines, the offices and the GeWeTe. The CCTV should cover the inside of the GeWeTe when the door is open
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct
- Information in regards to the CCTV should never be disclosed to any 3rd parties
- Placing and adjusting of the cameras should only be completed by IT with authorisation from the Area Manager and Operations Director
- Records should be kept to show who has access to the CCTV password and username
- Decorations should be not placed in areas which obscure the CCTV camera's view
- The CCTV should be stored in a security cabinet
- The key to the security cabinet to be locked in the key cabinet

When:

- The CCTV should be checked daily to ensure correct function

Who:

- The Venue Manager has responsibility for the CCTV system being checked and fully functional
- The Area Manager is responsible for the placement/vision position of the camera

Order of who to contact if in need of help / advice:

- Area Manager
- IT Department

Operations Manual

Machine Fraud Prevention

M05 – Version 1



Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place, and what to do in the event of spotting a “customer” defrauding a machine.

Best Result:

All employees are aware of the potential of machine fraud and what to look out for. Machine fraud is reduced and Company revenue is protected.

Worst Result:

Employees fail to identify fraud taking place, resulting in a loss of revenue. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended, with the exception of an emergency situation occurring
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the Area Manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security email address, Security@Merkur-Casino.Com with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster

When:

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees
- Customers with their hands over the coin mechanism, display or pay out tray
- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray
- Customers leaving the venue with machines still having money left in the bank

Who:

- All employees have a responsibility for protecting the business from machine fraud
- The Area Manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place – Security@Merkur-Casino.Com

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Operations Director

How:

If you suspect that machine fraud is taking place either:

- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick
2. This information should be provided by email to the security email address as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event
4. Income protection should be informed

MERKUR Slots Lone Working Policy

1. Introduction

MERKUR Slots, like many companies operating in the gaming and entertainment industry, has several aims when it comes to lone working. These aims typically focus on ensuring the safety, security, and well-being of employees while maintaining operational efficiency.

MERKUR Slots aims to keep lone working periods to a maximum of 6 continuous hours alone for individual employees, whenever possible. However, there may be times when circumstances make this aim unachievable and longer periods of lone working are required to meet business needs. MERKUR Slots will only schedule lone working between the hours of 22:00 and 06:00 as a last resort in order to avoid business closure.

MERKUR Slots is committed to ensuring the health, safety, and welfare of all employees, including those who work alone. This Lone Working Policy and Procedures outline the measures and procedures in place to protect employees who work alone, ensuring they are not exposed to undue risk.

2. Scope

This policy applies to all employees engaged in lone working activities at MERKUR Slots Venues. Lone working is defined as any work activity carried out in isolation from other workers without close or direct supervision.

3. Objectives

- To identify lone working activities and assess associated risks.
- To implement control measures to minimise risks.
- To provide training and resources to support safe lone working.
- To establish communication and monitoring systems for lone workers.
- To review and improve lone working procedures regularly.

4. Responsibilities

4.1 Management

- Ensure a risk assessment is conducted.
- Provide appropriate training and resources.
- Implement and maintain effective communication systems.
- Monitor and review lone working practices.

4.2 Employees

- Follow the lone working procedures and guidelines.
- Complete all Company provided training.
- Report any hazards or incidents to management.
- Use provided communication devices and systems.

5. Risk Assessment

A comprehensive risk assessment must be conducted. This assessment will consider:

- Potential hazards and risks.
- The environment in which the task is performed.
- The health and safety of the lone worker.
- Emergency procedures and communication systems.

6. Control Measures

Based on the risk assessment, appropriate control measures will be implemented, including but not limited to:

- Ensuring the lone worker is medically fit for the task.
- Providing training on safe lone working practices.
- Supplying necessary personal protective equipment (PPE).
- Establishing a robust communication system, such as regular check-ins, emergency contact numbers, and lone worker alarms.
- Ensuring access to first aid supplies and emergency procedures.

7. Communication and Monitoring

Effective communication and monitoring are crucial for the safety of lone workers. Measures include:

- Scheduled check-ins at regular intervals.
- Use of mobile phones or two-way radios.
- Emergency contact procedures and escalation protocols.

8. Training

All lone workers will receive training on:

- The risks associated with lone working.
- Control measures and safety procedures.
- Emergency escalation and response.
- Use of communication and monitoring systems.

9. Emergency Procedures

Clear emergency procedures must be established, including:

- Access to emergency contact numbers.
- First aid and medical assistance procedures.
- Incident reporting and response protocols.

10. Review and Improvement

This Lone Working Policy will be reviewed annually or following any significant incidents or changes in work practices. Employee feedback on lone working issues is encouraged and should be provided to the Area Manager in the first instance. Feedback from employees will also be considered in order to improve the policy and procedures.

11. Policy Compliance

Non-compliance with this policy may result in disciplinary action. All employees are expected to adhere to the lone working procedures and report any concerns to management promptly.

12. Conclusion

MERKUR Slots is dedicated to providing a safe working environment for all employees. This Lone Working Policy is a testament to our commitment to the health and safety of MERKUR Slots employees. By following this policy, MERKUR Slots can ensure that lone workers are protected and supported in their roles.

Why:

In order to ensure the safety of employees during periods of lone working, security precautions must be taken to ensure that risks to employees and the business are minimised. Employees should familiarise themselves with procedures which must be followed when lone working, before commencing any period of planned/unplanned lone working.

Best Result:

All employees adhere to the processes relating to lone working. The safety of the business, and more importantly employees and customers are improved as a result.

Worst Result:

Lone working processes are not followed, which compromises the safety of employees and customers and impacts the security of the business

Lone Working Procedure

Before commencing a period lone working in any venue, whether planned or emergency lone working, please ensure that the below processes are followed (step by step documents and guidance is included as per page numbers)

Ensure that a telephone (landline or mobile) is available on the shop floor at all times

Ensure that a Staff Guard Fob is carried at all times

- 1. Refer to the order of contact list, and contact relevant Manager/Nominated lone working contact venue dependent on the time of day, to inform of lone working situation**

Venue specific contacts list: Page 4

Order of contact list: Page 5

- 1.1 If the period of lone working will be longer than 6 continuous hours; in addition to the above, please also contact the relevant Manager to discuss how a break period will be managed**

Venue specific contacts list: Page 4

Order of contact list: Page 5

- 2. Review and Refresh understanding of emergency procedures and contact numbers to use in the event of an emergency**

Venue specific contacts list: Page 4

Emergency contact list: Page 6

- 3. Review and refresh understanding of the lone working risk assessment**

- 4. Review and refresh understanding of the lone working "do's and do nots" list**

Page 7

- 5. Review and refresh understanding of the Checking in and Keeping In Touch procedures**

Page 8

- 6. Review and refresh understanding of Locked Door Operation**

Page 9

Lone Working Policy and Procedure S01-V2



Contacts List

Night Manager (Night Phone)
Between 22:00 and 06:00 only

07887 416522

Primary Nominated Lone Working
Contact Venue:

Telephone:

Secondary Nominated Lone Working
Contact Venue:
(if applicable)

Telephone:

Venue Manager:

Mobile:

Cluster Manager:
(if applicable)

Mobile:

Area Manager:

Mobile:

Operations Director:
(Emergency only)

Mobile:

- 1. Employee to refer Non-Emergency Contacts list below, and contact relevant manager/Nominated lone working contact venue, dependent on the time of day, to inform of lone working situation;**

Non-Emergency Contacts

Order of contact between the hours of 22:00 and 06:00

- Nominated Lone Working Venue
- Night Manager

Order of contact between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager

- 1.1 If the period of lone working will exceed 6 hours, and a break is not able to be taken during the entirety of the shift; in addition to the above, please also contact the relevant Manager below, to discuss how break will be managed.**

Between the hours of 22:00 and 06:00

- Night Manager

Between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager

- 2. Review and refresh understanding of emergency procedures and contact numbers to use in the event of an emergency**

Emergency Procedure

Should a serious incident happen in your venue, in the worst-case scenario try and stay calm and REMEMBER; we do not expect you to be a hero. Your safety, along with that of other employees and our customers, are of paramount importance.

To help you stay calm and deal with a serious incident remember the following:

- ✓ The priority is always the safety of employees and customers
- ✓ Initial reaction is normally "fight or flight". Do neither. Stay calm and don't take any sudden action
- ✓ Keep calm, don't shout or scream
- ✓ Do as you are told and keep your hands in view at all times
- ✓ Only activate the Staff Guard/PA if it is safe to do so
- ✓ Do not make eye contact with offender(s)
- ✓ Try to memorise things like scars, tattoos, unusual accents as well as clothing. You must write these down as soon as it is possible and safe to do so

Following such an incident the below steps should be followed;

- Close the venue
- Do not touch anything
- Check everyone is OK and if anyone needs assistance
- If the robbers dropped anything do not pick it up
- Try not to stand in the areas that the robbers have stood in
- If Staff Guard or a Panic Alarm was not activated, call 999 and inform the police of the situation
- Inform your Area Manager via a telephone call, if the Area Manager is not available contact the Operations Director.

REMEMBER

If faced with a serious incident, only activate Staff Guard/ Static Panic Alarm if it is safe to do so and will not put any one at risk

Emergency Contacts List

Emergency contact telephone numbers can be found on page 4

Order of contact during day time lone working
Between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director

During night time lone working
Between the hours of 22:00 and 06:00

- Night Manager
- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director

Incident Reporting Process

Any unusual incidents must be recorded and reported using the Safety Culture template: "MERKUR Casino Security Report"

In instances where, for whatever reason, an incident cannot be recorded on Safety Culture, the "MS65 -V1 INCIDENT REPORT FORM"

The form can be found on my MERKUR; From the home page > Documents > Venue Documents > MERKUR Paperwork > "MS65 -V1 INCIDENT REPORT FORM"

It is recommended that a small stock of this document is kept alongside the "Lone Working Policy and Procedures" document, for ease of access.

3. Review and refresh understanding of the lone working risk assessment

4. Review and refresh understanding of the lone working “do’s and do nots” list

The Do’s of Lone Working

- Ensure that a Staff Guard fob is carried at all times
- Ensure that a telephone (mobile or landline) is available at all times
- If you are in need of non-emergency assistance/guidance, make contact with time relevant colleagues in the business via the non-emergency contacts list
- Keep all emergency contact numbers to hand at all times
- Make an assessment to whether Locked Door Operation should be used, if so, the Locked Door Operation guidance must be followed
- Ensure that you carry a Staff Guard Fob and remind yourself of Static Panic Alarm locations
- Keep all office doors locked
- Ensure that all safes are locked
- Ensure that all keys are stored inside time delay safes
- Ensure that all money is inside time delay safes – apart from a venue optional personal float (to be agreed by Venue Manager) of £500 which is to be stored in a safe without a time delay requirement for access
- Be mindful/wary of unfamiliar customers
- If there is a threat to the safety of employees or customers, do not hesitate to use Staff Guard, providing it is safe to do so
- In the event of an emergency situation Call 999, providing it is safe to do so
- Record all incidents, as per the incident recording process
- Remind yourself of the GeWeTe S.O.S code;
The GeWeTe S.O.S code for this venue is;

The Do Nots of Lone Working

- Leave the premises unattended at any time, except in the case of an emergency
- Discuss security or operational procedures with anyone whilst working on the venue floor
- Access or remove cash from any time delay safe, GeWeTe, Machine or ATM
- Remove machine, GeWeTe or ATM keys from any time delay safe
- Undertake any maintenance involving electrics or heights within the venue
- Hesitate to contact a member of management using the emergency contact procedures if you are in doubt about anything
- Approach anyone who is threatening the security of the venue. Employee and customer safety must come first and you must co-operate at all times
- Activate the staff guard or static alarm system, if you feel it is unsafe to do so

5. Review and refresh understanding of the Checking in and Keeping in Touch Procedures

The Keeping in Touch Procedure

Employees must follow the keeping in touch procedure when lone working

1. When a period of lone working takes place, the lone working employee must contact their nominated keeping in touch venue and advise that they are lone working
2. The lone working employee should contact their designated venue every half hour for the full duration of the period of lone working
3. Following the period of lone working being completed, the nominated checking in venue should be informed
4. If no contact is made at the above times to check in, the nominated venue must try to make contact with employee who is lone working
5. If no contact is made following the above step; The nominated venue must contact the Area Manager or Night Manager (between the hours of 22:00 and 06:00) immediately

Checking In

Employees must follow the checking in when opening/closing a venue alone

When opening/closing a venue or re-opening a venue following a period of locked door operation:

- Be vigilant and aware of anyone suspicious in immediate surrounds of the venue
- Be alert and pay particular attention to parked cars with people sitting inside them and/or anyone waiting in the vicinity of the premises
- If you notice anything suspicious, please contact your Area Manager for advice before opening the venue
- If it is safe to do so, employees should enter the building and immediately lock the door behind them before turning off the venue alarm system
- Collect a Staff Guard fob immediately, and carry at all times.

Opening/Closing Venue – The Checking in Procedure

1. Prior to opening/closing the venue, a call must be made to the nominated contact venue, Area Manager or Night Manager (if between the hours of 22:00 and 06:00) to inform them that you will be opening/closing a venue alone
2. Once the venue is alarmed and closed, a call must be made to the same venue/manager to confirm that all is OK
3. If any issues occur which need reporting, these must be immediately reported to the Area Manager or Night Manager (if between the hours of 22:00 – 06:00)

6. Review and refresh understanding of Locked Door Operation

Locked Door Operation

If, while lone working, an employee feels that the safety of themselves, and/or the safety of other customers is at significant risk, a locked door operation can be applied.

All employees are able to make the decision to apply a locked door operation without prior permission, however, as noted below, any occurrences of the door being locked during operational hours must be reported

- Where License Conditions or the Local Area Risk Assessment (LARA) specify that a locked door operation must be in place throughout set hours, venues must comply. The Venue Manager/Area Manager are responsible for ensuring licensing conditions are adhered to, and will provide employees with relevant information on this point.
- In any instances where there is a significant risk to the safety of employees or customers, locked door operation should be applied
- Where locked door operation is applied, and mag locks are in place, the door should be secured by maglock only. In venues which do not have a mag lock, the front door should be locked by key and the lone working employee should pay attention to the front door in case customers wish to enter or exit
- Throughout all hours of trade, a locked door operation should only be applied during hours of lone working, or if there is a safety concern for employees and/or customers
- Operating with a locked door is authorised. however, operating with a locked door must still be reported to either: Cluster Manager, Area Manager or Night Manager, relevant to the time of day as below;

Between the hours of 06:00 and 22:00

- Cluster Manager
- Area Manager

Between the hours of 22:00 and 06:00

- Night Manager - 07887 416522

- The length of the time which the locked door operation will be applied for, is to be agreed with the Cluster Manager, Area Manager or Night Manager at the time of reporting the door being locked
- While operating with a locked door, the front door should be manned for as much time as possible
- During operating with a locked door, employees should allow known customers access to the venue (providing they are no threat to safety)
- Employees should consider the access to non-known customers on a customer-by-customer basis, and should make an informed decision on whether to allow entry or not. However, there should be a clear reason as to why an unknown customer is not provided access to the venue

Other Relating Procedures

Reporting of Safeguarding Equipment Faults

It is of the highest importance that all equipment which acts as a safeguard for employees during lone working, and non-lone working periods alike, are always in working order.

In instances whereby safeguarding equipment is found to not be working correctly, this must be reported at the earliest opportunity. Ideally to the Venue Manager or as per the email contacts below.

Safe guard equipment which should always be working (or reported):

ITSupport@merkur-casino.com

- Staff Guard fobs
- Staff Guard unit
- Telephone
- CCTV

Fmhelpdesk@merkur-casino.com

- 60-minute time lock delay main safe
- Mag lock system
- Lock system on door of agreed panic room
- Fire alarm system

Venue Manager

- Door chimes (if in place/applicable)
- First aid kit – Agreed Company stock standards and up to date

Staff Guard Fob

The Staff Guard system helps to de-escalate and deter aggressive incidents and give employees a way of contacting help when required. We are not charged as a Company for individual usage of the Staff Guard System; therefore, it should be used freely when deemed necessary and is considered safe to do so. Never use the Staff Guard system if you believe it will cause the situation to become more dangerous.

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds in order to try and understand what is happening in the venue.

IF YOU ARE IN IMMEDIATE DANGER, SAY:

"CALL THE MANAGER" – This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, Staff Guard will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: **"Stand By"**

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say **"Standing By"** every few minutes to assure/remind you that they are still there.

Say: **"Stand Down"** once you no longer need assistance.



Operations Manual

Locked Door Operation

S07– Version 1



Why:

MERKUR Slots venues may, at times, operate a venue with a locked door, in order to ensure the safety of employees and customers. There are certain considerations and reporting processes which must be followed when operating a locked door during operational hours.

Best Result:

All employees are aware of the importance of following Company processes, when operating with a locked door. Employee and customer safety is heightened as a result.

Worst Result:

Employees do not follow the process for operating the venue with a locked door. Resulting in decreased safety for employees and customers and a risk of impact to the businesses profitability.

What:

- Where License Conditions or the Local Area Risk Assessment (LARA) specify that a locked door operation must be in place throughout set hours, venues must comply.
- Employees of MERKUR Slots must always make the safety of themselves and customers a priority
- In any instances where there is a significant risk to the safety of employees or customers, locked door operation should be applied
- Throughout all hours of trade, a locked door operation should only be applied during hours of lone working, or if there is a safety concern for employees and/or customers
- Operating with a locked door is authorised. however, operating with a locked door must still be reported, as per below points
- Any locked door operation must be reported to either: Cluster Manager, Area Manager or Night Manager, relevant to the time of day
- The length of the time which the locked door operation will be applied for, is to be agreed with the Cluster Manager, Area Manager or Night Manager at the time of reporting the door being locked
- While operating with a locked door, the front door must be manned for as much time as possible
- During operating with a locked door, employees should allow known customers access to the venue (providing they are no threat to safety)
- Employees should consider the access to non-known customers on a customer-by-customer basis, and should make an informed decision on whether to allow entry or not. However, there should be a clear reason as to why an unknown customer is not provided access to the venue
- During times of locked door operations, employees should follow Company processes noted in the S1/01 Lone Working document, found in the Operations Manual

When:

- Locked door operation can be applied at any point during operational hours, however, as noted, there must be a clear reasoning behind the decision to do so

Who:

- All employees are able to make a decision to operate with a locked door, providing the circumstances warrant the decision

Who to contact if in need of help / advice:

- Cluster Manager
- Area Manager
- Night Manager (As per S1/01 Lone Working document)

Operations Manual

Staff Guard and Panic Alarms

S04 – Version 1



Why:

The security of employees is of the upmost importance; therefore, personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (Ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention
- Staff guard should be tested at least once per week – Recorded on MS141 (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- Mobile Panic Alarms should be tested and recorded once per month MS116-V1 MPA test record
- **Employees should not be hesitant to use staff guard when there is a genuine reason – This is a service which MERKUR pay for.**
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system
- For static alarms ensure that the reset key is available at all times
- Some Venues have panic buttons on the intruder alarm – These will usually be found under the Service Desk and near the safe. These alarms require 2 red buttons to be pressed simultaneously which will trigger a silent alarm. These alarms will also work in the event of a network or power failure

When:

- The staff guard unit should be tested once per week
- The staff guard unit should be activated whenever employees are feeling uncomfortable, threatened or in danger
- The MPA system should be used only when immediate police assistance is required

Operations Manual

Staff Guard and Panic Alarms

S04 – Version 1



Who:

- The MPA unit and/or Staff guard fob should be carried by employees at all times
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices

Related / supporting documents:

- MS141 – Staff Guard Test Record

Order of who to contact if in need of help / advice:

- Area Manager
- IT Department
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours. Out of hours, the number transfers straight to an engineer so he may be woken by the call, do not press the fob if you have maintenance issues – dial this number as directed)

How:

Staff Guard Operation

1. Slide cover up on fob and press the red button – this dials Staff Guard.
2. A blue light will flash on the unit which shows that it's dialing.
3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER, SAY:

CALL THE MANAGER – This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: "Stand By"

They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say "Standing by" every few minutes to assure/remind you that they are still there.

Say: "Stand down" once you no longer need assistance.



How to make a test call:

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call

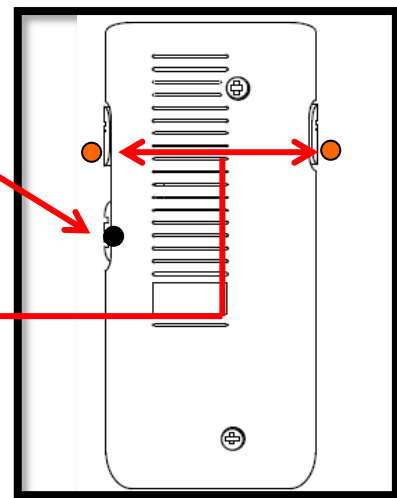


Mobile Panic Alarms (MPA)

Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

1. Slide the black button downwards to unlock the orange buttons
2. Press the two orange side buttons together

The panic alarm does not work if you press only one button
The black button should be kept in the locked position to prevent false activations



How it works:

The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

CAUTION – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

Operations Manual

Keeping In Touch Procedure

S08 – Version 1



Why:

The keeping in touch procedure is a safety and security procedure which promotes regular communication between venues during periods of lone working, or opening/closing a venue whilst alone.

Best Result:

All employees follow the keeping in touch procedure while lone working, increasing the safety and security of those employees undertaking lone working.

Worst Result:

Employees do not follow the keeping in touch process, resulting in an increased risk to employees who are lone working.

What:

- Employees must follow the keeping in touch procedure when lone working
- Employees must follow the keeping in touch procedure when opening/closing a venue alone

When opening a venue:

- Be vigilant and aware of anyone suspicious
- Be alert and pay particular attention to parked cars with people sitting inside them and/or anyone waiting in the vicinity of the premises
- If you notice anything suspicious, please contact your Area Manager for advice before opening the venue
- If you are alone when opening the venue, you must observe the "Checking In: Opening/Closing A Venue Alone" process
- If it is safe to do so, employees should enter the building and immediately lock the door behind them before turning off the venue alarm system

How:

Keeping In Touch

1. When a period of lone working takes place between the hours of 22:00 – 06:00, the lone working employee must contact their nominated keeping in touch venue and advise that they are lone working
2. The lone working employee should contact their designated venue on the hour and half hour for the full duration of the period of lone working
3. Following the period of lone working being completed, the nominated checking in venue should be informed
4. If no contact is made at the above times to check in, the nominated venue must try to make contact with employee who is lone working
5. If no contact is made following the above step; The nominated venue must contact the Area Manager or Night Manager (between the hours of 22:00 and 06:00) immediately

Checking In: Opening/Closing A Venue Alone

1. Prior to opening/closing the venue, a call must be made to the nominated contact venue, Area Manager or Night Manager (if between the hours of 22:00 and 06:00) to inform them that you will be opening/closing a venue alone
2. Once the venue is alarmed and closed, a call must be made to the same venue/manager to confirm that all is OK
3. If any issues occur which need reporting, these must be immediately reported to the Area Manager or Night Manager (if between the hours of 22:00 – 06:00)

When:

- This document applies to all periods of lone working

Who:

- This document is applicable to all employees during periods of lone working

Related/supporting documents:

- S1/01 Lone Working
- S7/01 Locked Door Operation

Order of who to contact if in need of help/advice:

- Venue Manager
- Cluster Manager
- Area Manager
- Night Manager (between hours of 22:00 and 06:00 only)
- Operations Director

MERKUR Slots

Training Plan

Day 1 – Induction

Level 7

Level 6

Level 5

REMINDER – Please ensure that the Day 1 – Induction is completed on the first day.

Training

How often have you started a new job, and all the training has been crammed into the first couple of days? It has been common practice in ensuring that the three main compliance courses are done on day one. Whilst this has been company policy, it is not a legal requirement.

With this in mind, we wish to spread out all aspects of training over a period of weeks, and not overwhelm the new starters. We recommend that you follow this guide, but you do have flexibility within each week; this will help meet the needs of the business. We understand that it may not be completed sequentially.

First impressions count

It is well documented that someone will form an impression of you within 7 seconds. A genuine warm welcome to a new colleague could make all the difference, and make them feel valued, right from the start.

As their line manager, make time to spend with them, and give them your full attention. Whatever you do will impact on their opinion of you and our company. A well thought out and implemented induction could help retain new staff, whilst creating a positive and professional impression.

Preparation

- Have you taken the time to read and understand all the guides in full, and prepared all necessary resources available to you?
- Is there a computer available, which the new employee can use?
- Do you have a member of staff on duty, that the new team member will be able to shadow?

MERKUR Slots

Training Plan

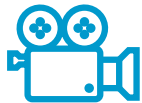
Housekeeping

- Welcome the new member of staff and offer them a refreshment.
- Introduce them to their colleagues, and any customers in the venue.
- Mention if there is a planned fire drill.
- Show them where they can keep their personal belongings.
- Point out where the toilets are.

Introduction to Workday/Litmos

New employees:

- Guide the new employee through Litmos and the functions they will be required to use.
- Highlight the mandatory courses that need to be completed on Litmos. The courses will be spread out over the 12-week induction. Too many courses at once can be overwhelming, and arguably, much of the Information may not be retained.



Watch the **MERKUR UK & MERKUR International Power Point presentation** on Litmos.



Welcome to Workday (Employees) (Litmos > Content Library > Collections)



Navigation & Need to Know (Litmos > Content Library > Collections)



Navigation of Litmos Dashboard (MyMERKUR > Documents > L&D Documents > Introduction to Litmos).

MERKUR Slots

Training Plan

Venue Tour

Give a tour of the venue, covering the layout, where important items are kept, and safety procedures that are in place.

Use the following check list to assist you:

Fire safety

- Point out where every fire exit is.
- Walk through every route of escape.
- Highlight where the fire assembly point is.
- Point out all the fire extinguishers.
- Identify all the alarm call points.
- Show them where the customer's smoking area is, and where staff are permitted to smoke.

Compliance

- Talk through what is on the information board.
- Show the employee where the Compliance folder is kept and talk through it.
- Show the employee where the Ops Manual can be found online.
- Give a general overview of everything the tablet is used for.
- Explain our policy on Identifying visitors, internally and externally.
- Show the trainee where the first aid box is kept.
- Point out where the accident book is kept.
- Explain where risk assessments can be found, and what they are for.

REMEMBER - There may be procedures and requirements that are unique to your venue. Does your premises licence have any special conditions? The new member of staff needs to be made fully aware.



Complete the **Venue Tour Activity** on Litmos – Week 1 Learning Pathway.

MERKUR Slots

Training Plan

Team Structure

Explain the team structure within the venue, and operations. Give the employee an understanding who is there for support in their new role.

- What are all the job roles within your venue.
- Who is the Cluster Manager, and what is their role.
- Who is the Area Manager, and what is their role.
- Who is the Operations Director.
- Where the Emergency Contacts list can be found.

Workday App

Ensure that your trainee has downloaded the Apps required for Workday and understands how to use and access them. They should have:

- Workday App
- Docusign
- Authenticator

Check In/Out – Part 1

Step 1	Point out where the SMART tablet is kept.
Step 2	Identify the Check-In/Out section.
Step 3	Explain how to use the Check-In/Out section.

REMEMBER – If you do not check In/Out, you will not get paid.

The employee is now aware that they must check in and out every time, but it is also necessary to approve the submitted time at the end of the week, every week.

At the end of week 1 your trainee will have checked in and out multiple times and will be able to see the full picture. This is the time from them to approve the submitted time.



Time & Scheduling Check In/Out (Litmos > Content Library > Collections)

HINT – This would be a good point to introduce the trainee to the MS28 – **Staff Signing In and out record**.

MERKUR Slots

Training Plan

Scheduling

One of the most important things for an employee, is knowing when they are working, so this is suitable time to introduce them to their schedule:

- Show them how they can see their schedule on the App.
- Show them where they can see the hard copies.



Welcome to Time & Scheduling Hub (Employees) (Litmos > Content Library > Collections)



Overview of how to view schedule & review shifts (Litmos > Content Library > Collections)

HINT – Does the trainee know the shifts they will be working for the rest of the week?

Standards & Expectations

Talk through our brand values, and the 5 pillars.



Complete the **Brand Activity** on Litmos – Week 1 Learning Pathway.

Explain what the company standards are and highlight what your expectations are. Areas to cover:

- Time keeping
- Sickness

Uniforms & Appearance



You are a 'Brand Ambassador' for our Company.

The company philosophy of providing services at the highest level is reflected in the appearance of all colleagues within the company.

Customer Service Standards are not just how you look after our customers; it is how our customers also see you.

As a member of our MERKUR slots team, a uniform will be provided for you to wear when you are on duty.

MERKUR Slots

Training Plan

When considering your appearance, the correct fit and condition of the uniform must be considered, along with it being presented well. You will be quickly and safely recognisable as a member of the MERKUR Slots team from a customer's point of view.

*Name badges should be worn at work as part of your uniform. "Think 25" badge **must be** worn at all times. Name badges should be displayed on the right-hand side of your uniform, "Think 25" badge is to be positioned above the name badge.*

Appearance of Employees

- *Well-groomed hair*
- *Pleasant body odour*
- *Perfectly cared hands (including fingernails)*
- *Minimal make-up*
- *Minimal jewellery "less is more"*
- *Good oral hygiene*
- *It is preferred that tattoos are covered up, especially if it is explicit or may cause offence.*
- *Dark footwear only. No open footwear*
- *Standards of dress will be monitored regularly and should be adhered to at all times.*

REMEMBER – You should be leading by example. A new member of staff will have no respect for you if you do not 'practise what you preach.'



Read **CS1/01 – Uniform & Appearance** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > Customer Service).



Read **GP8/01 – Sickness/Injury Reporting** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > General Procedures).

Compliance Essentials – Equality & Diversity



E-learning to be completed on Litmos – **Compliance Essentials – Equality & Diversity 1.0 (UK)**.

Smoking & Vaping

Explain the company policies on smoking & Vaping. This is an ideal time to lay out your expectations regarding smoke breaks.



Read **CS12/01 Employee Smoking & Vaping** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > Customer Service).

MERKUR Slots

Training Plan

Introduction to the shop floor

Allocate time for the new member of staff to work on the shop floor. Ideally, it should be with yourself, but it could be any member of staff that works to standard.

This is an observational exercise, and the trainee should be shadowing whomever they are working with. During this time, ask the trainee to record what they see: e.g., staff acknowledging customers when entering. Give them a copy of the WOW factor and the customer journey.

Fire Safety – Part 1

Fire drills are particularly important, and new starters often get forgotten about.

TASK – Run a fire drill and complete the fire register log.



Read **HS2/01 – Fire Safety** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > Health & Safety).

REMEMBER – If an auditor turns up, and a fire drill has not been completed with the trainee, your venue will lose marks.

End of day review

It is particularly important to set out time to have a chat with your new member of staff. This will further enhance their experience. Suggested questions:

- What have you learned today?
- How do you feel the day has gone?
- Do you have any questions?

From 'Introduction to the shop floor,' please review what your trainee observed, whilst shadowing.

Give a brief overview on what is going to be happening on day 2.

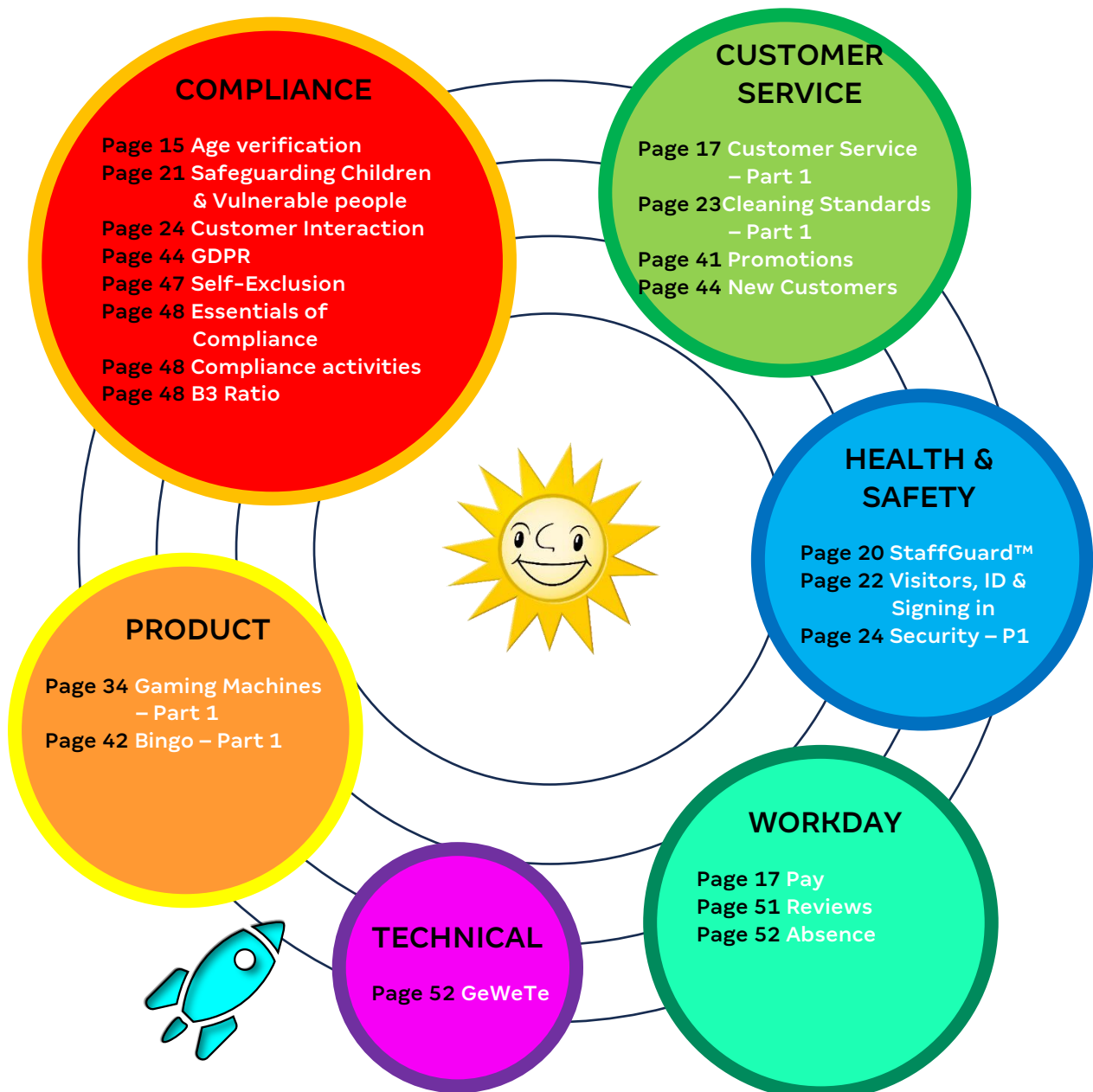
MERKUR Slots

Training Plan

Learning Map – Week 1

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the ‘How to use the Management Guide to Training’.



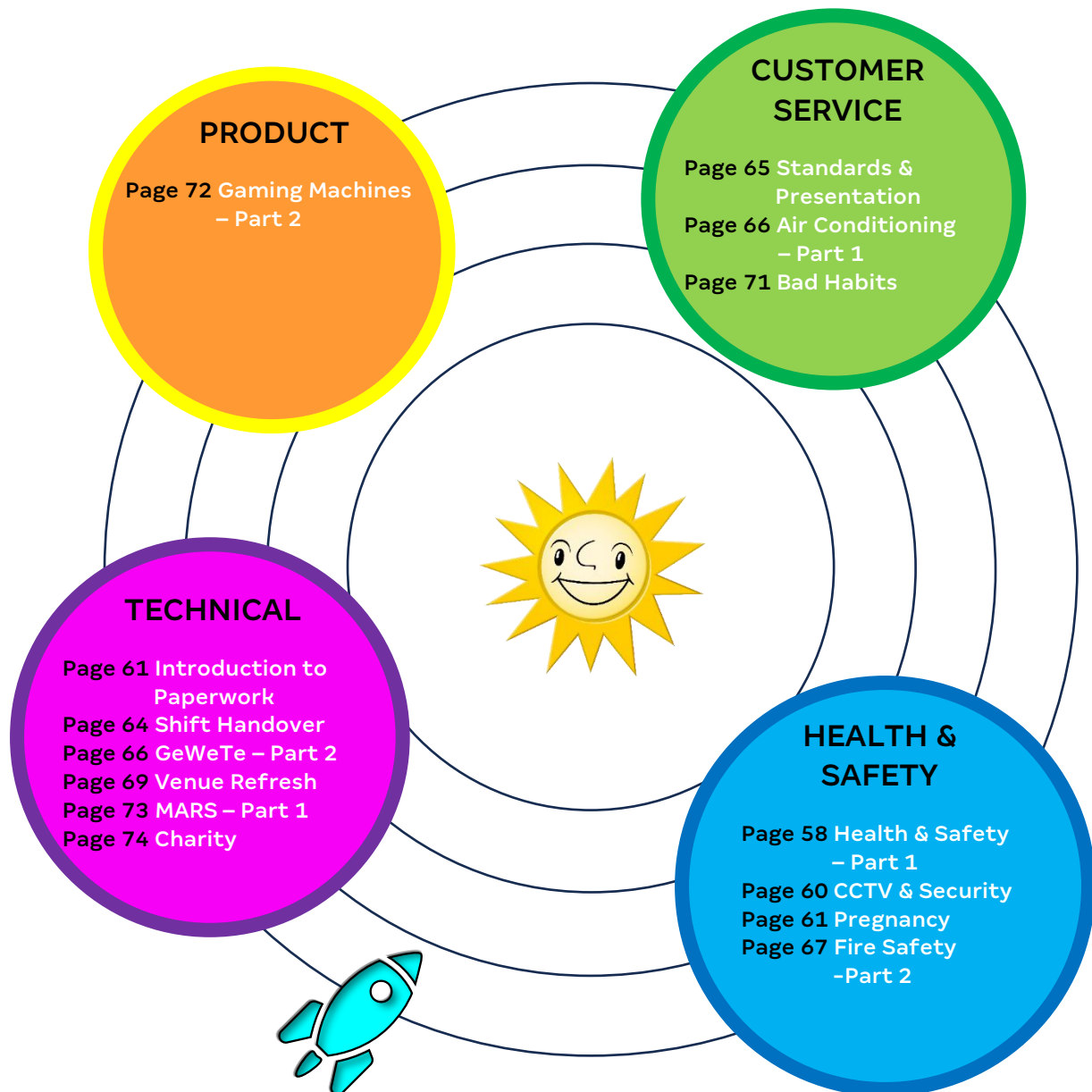
MERKUR Slots

Training Plan

Learning Map – Week 2

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the ‘How to use the Management Guide to Training’.



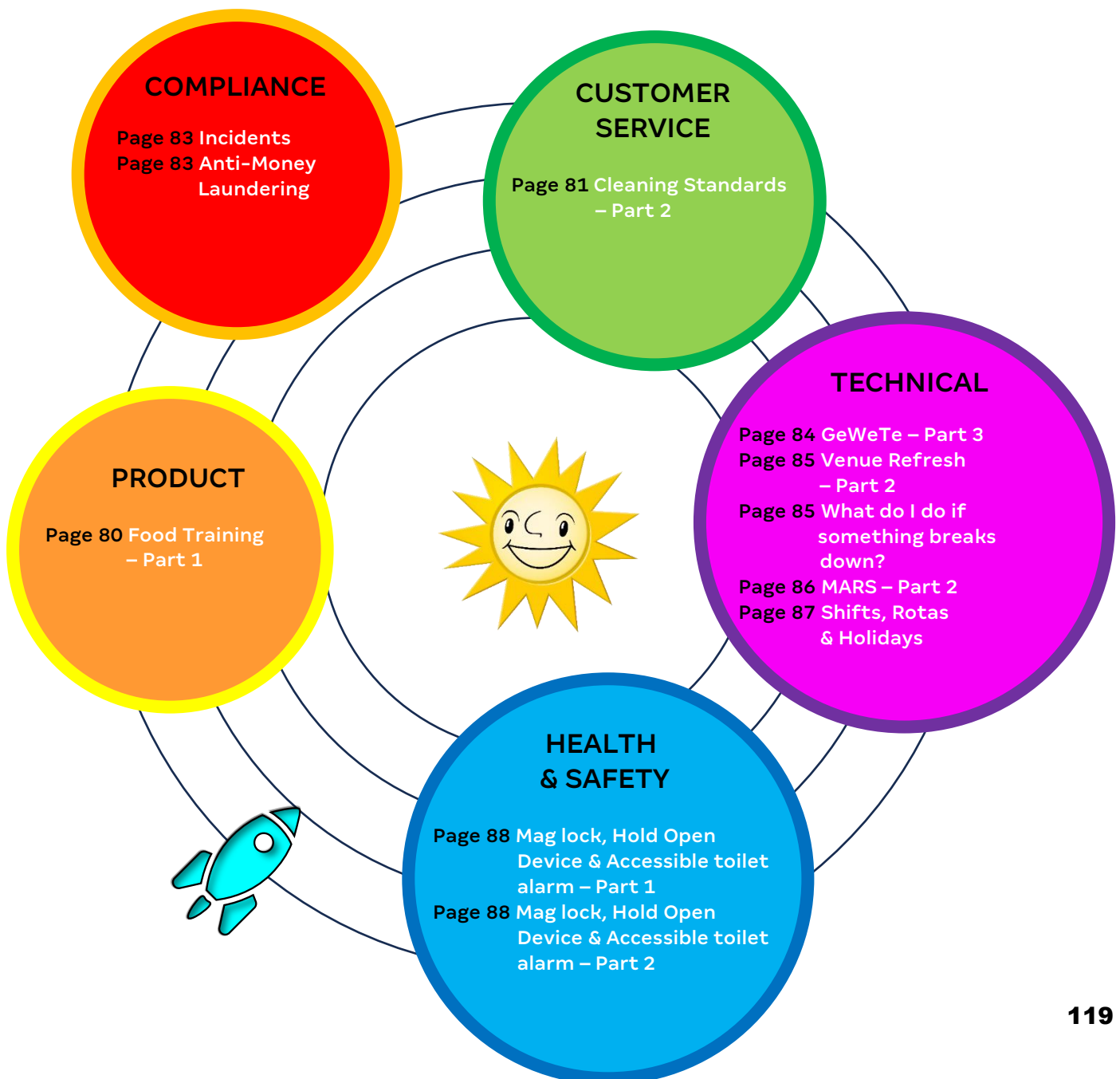
MERKUR Slots

Training Plan

Learning Map – Week 3

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the 'How to use the Management Guide to Training'.



MERKUR Slots

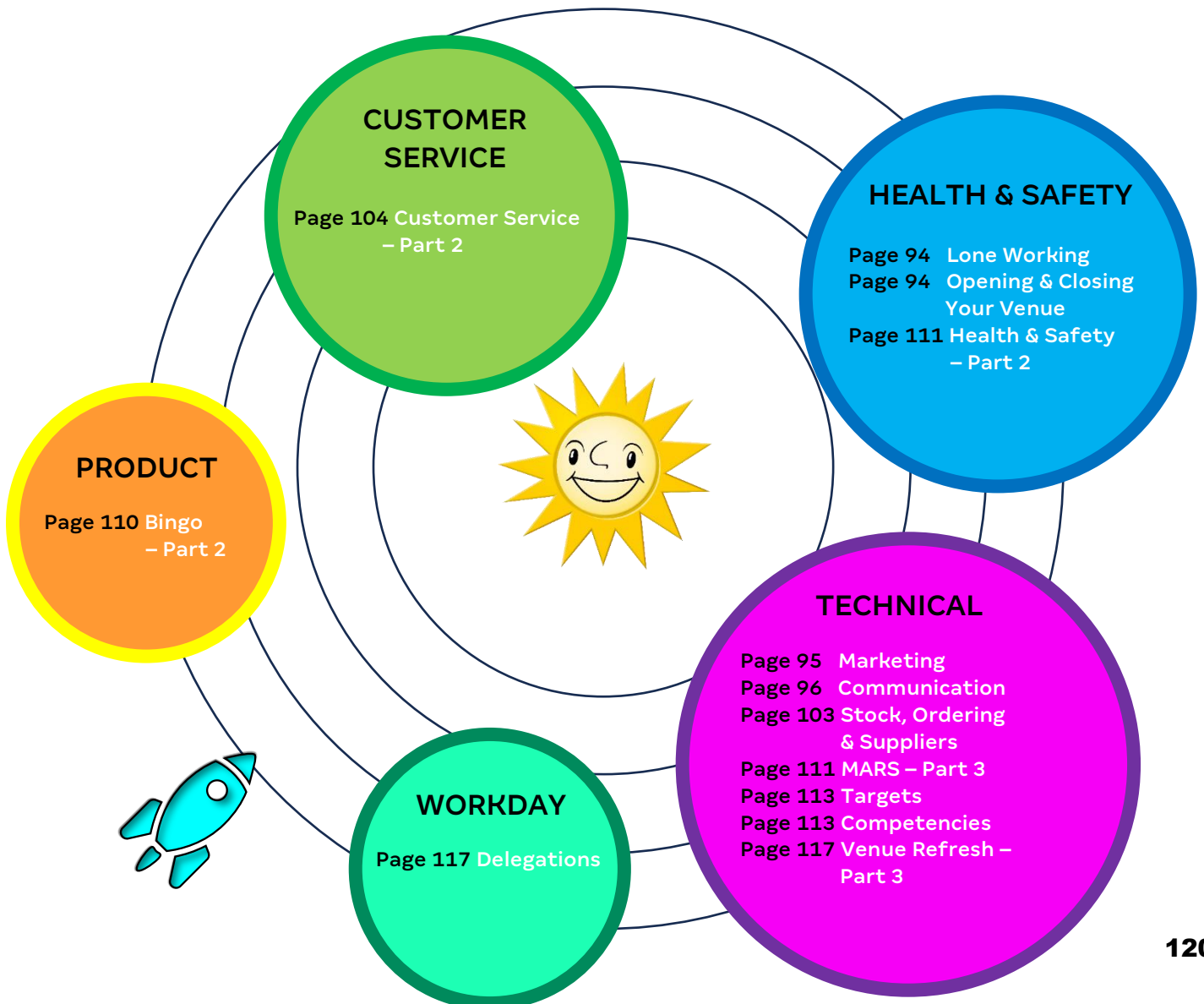
Training Plan

Week 4 Guide

Learning Map – Week 4

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

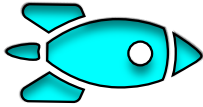
For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the 'How to use the Management Guide to Training'.



MERKUR Slots Training Plan

Week 5 Guide

Learning Map – Week 5

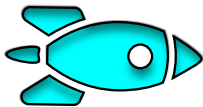


TECHNICAL

Page 123 Pre-Collection
Page 124 The Collection
– Part 1
Page 128 Handpays, Cash
Claims & Tito

Week 6 Guide

Learning Map – Week 6



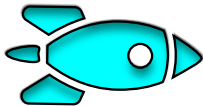
TECHNICAL

Page 133 The Collection
– Part 2

MERKUR Slots Training Plan

Week 7 Guide

Learning Map – Week 7

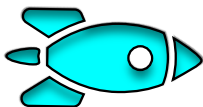


TECHNICAL

Page 138 The Collection
– Part 3

Week 8 Guide

Learning Map – Week 8



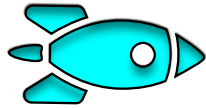
TECHNICAL

Page 143 The Collection
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Page 144 Understanding
Your Customer

MERKUR Slots Training Plan

Week 9 Guide

Learning Map – Week 9



TECHNICAL

Page 158 The Collection
– Part 5

HEALTH & SAFETY

Page 159 Security
– Part 2

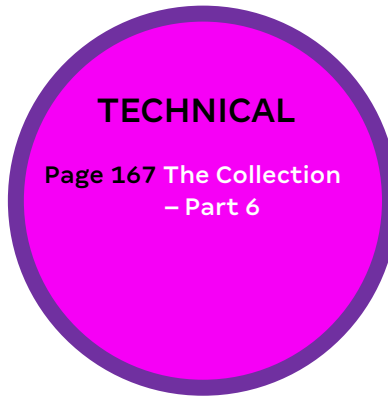
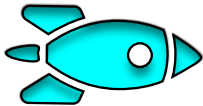
COMPLIANCE

Page 160 SMART
Tablet

MERKUR Slots Training Plan

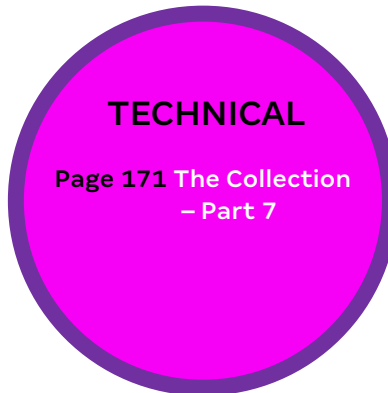
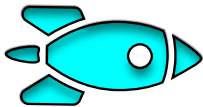
Week 10 Guide

Learning Map – Week 10



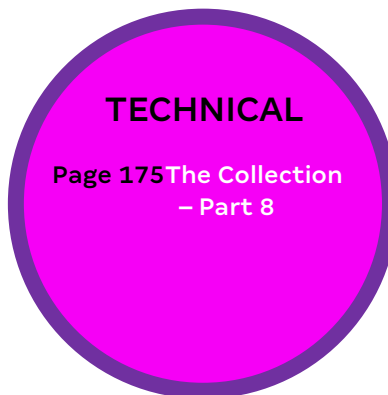
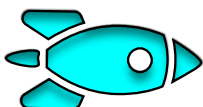
Week 11 Guide

Learning Map – Week 11



Week 12 Guide

Learning Map – Week 12



ROADMAP TO SUCCESS

The MERKUR Slots Roadmap to Success identifies and gives a clear journey of how to progress within your role.

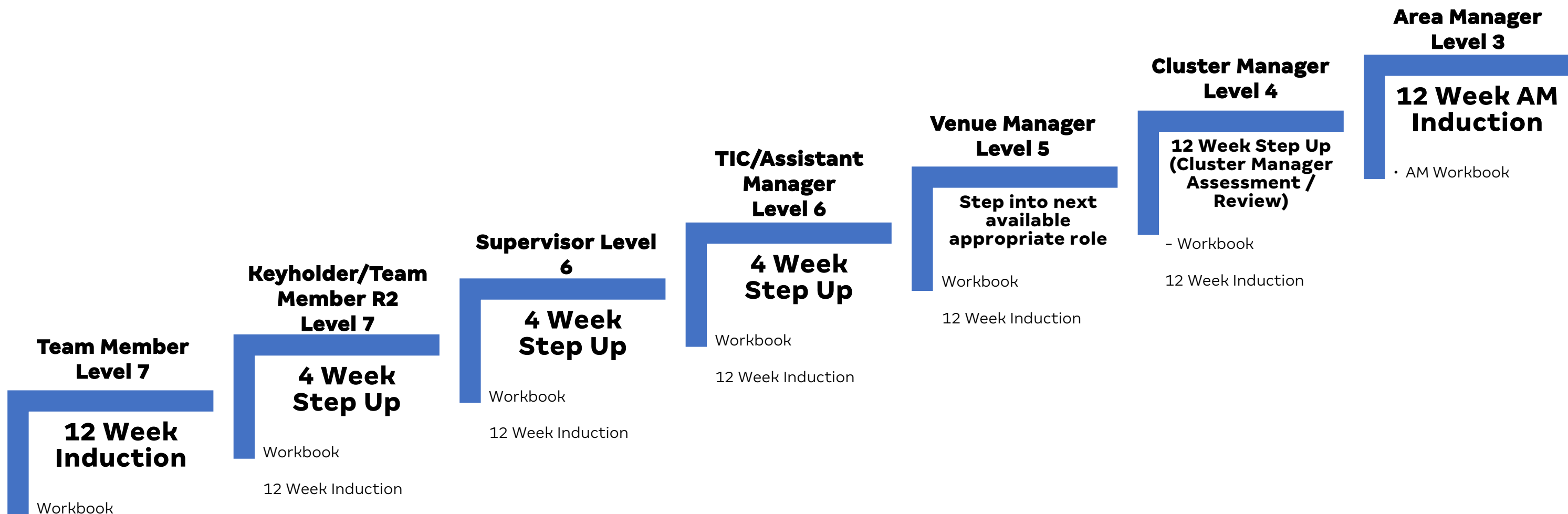
You will be able to identify where you are in your journey and what is the expectation within your role. If you have an interest in progressing further the roadmap will highlight what the expectation at the next level is, and how you can achieve this.

You cannot progress further up the steps until you have achieved all requirements from the previous step and are displaying behaviours within the next levels competencies.

This Roadmap is designed to ensure that everyone has the same expectations within their role, and also allows you to develop to your own capabilities.

In the training timeline, there are seven different ways of accessing the training programme depending on where you start your journey. For anyone new joining the business you will have to complete your 12-week Induction following the relevant workbook and sign off.

This document will outline the hierarchal structure, using the job purpose and main tasks from the job description, focus on the training time lines and expectations within timelines; objective setting and reviews; and what courses/workshops will be available.



You must attain the competency of the previous step before progressing	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
	INITIAL TRAINING PERIOD	INITIAL TRAINING PERIOD	INITIAL TRAINING PERIOD	INITIAL TRAINING PERIOD	INITIAL TRAINING PERIOD	INITIAL TRAINING PERIOD	INITIAL TRAINING PERIOD
	Weeks 1– 12 Venue Manager – Responsible for Sign off Workbook	4 Weeks Venue Manager – Responsible for Sign off	4 Weeks Area Manager/Cluster Manager – Responsible for sign off	4 Weeks Area Manager/Cluster Manager – Responsible for sign off	Step into Next available role Area Manager/Cluster Manager – Responsible for sign off	12 Weeks Area Manager/Operations Director – Responsible for sign off	12 Weeks Operations Director – Responsible for sign off
BEHAVIOURS	<p>Team Member can demonstrate and apply the following:</p> <ul style="list-style-type: none"> To promote the Company in a positive manner when dealing with internal and external customers. Assisting customers with queries, pay outs and any other issues that may arise. Own and resolve problems escalating where appropriate and in accordance with the complaints policy. To manage the customer journey through the WOOOOOOOW Factor. To follow all relevant company policies and procedures ensuring safety and security processes are adhered to. assist with pre- collection/midweek collection procedures as directed if required. Complete company paperwork and accounting as per company policies. To ensure the venue is compliant following all relevant policies and procedures outlined in the Compliance Manual. To carry out any other reasonable duties as required, undertake additional or alternative duties related to you position as directed from time to time by your line manager. Keep up to date with changes to the business using relevant systems (Meetings/MyMERKUR/Litmos/Workday etc). 	<p>Keyholder can demonstrate and apply the following:</p> <ul style="list-style-type: none"> To ensure that customer service is carried out in line with the company standards owning and resolving any problem. Ensure that customer complaints are dealt with as quickly as possible. Responsible for understanding and ensuring compliance with internal Responsible Gambling policies and UK Gambling Commission Licence Codes of Conduct and Practice (LCCP). Organise team when working in the capacity of the keyholder to ensure all tasks are completed to the company standard. To ensure that all machines in venue are playable, reporting any machines faults on MARS. 	<p>Supervisor can demonstrate and apply the following:</p> <ul style="list-style-type: none"> Establish and maintain customer service standards, positive experience on behalf of the company and maximise income wherever possible. To ensure that all employees perform to required personal and company standards promoting teamwork to enhance business opportunities. Ensure that all daily/weekly/periodical administration is completed at the correct time and to the required standard. Retain completed administration in line with company policy and legal requirements. Standards are maintained at a high level and that all housekeeping standards are adhered to. To monitor competitor activity, report as appropriate and recommend action where required. 	<p>Assistant Managers can demonstrate and apply the following:</p> <ul style="list-style-type: none"> Support the VM or Cluster/Area Manager in operating the venue. Leads by example ensuring the team understands how to deliver excellent customer service. Aware of the company audit requirements and ensure the team are implementing daily. Support VM in managing the team. Play an active role in team briefings as and when required as well as attend Area meetings as required. Create schedules and support the VM, in manning the venue. To support the VM in achieving KPI's and audits. Review employee training in line with company policy. Effectively manage the machine arcade alongside the team to maximise revenue opportunities. 	<p>Venue Managers demonstrate and apply the following:</p> <ul style="list-style-type: none"> To undertake team briefings as and when required as well as attend Area meetings as required. To conduct regular, random checks of floats, keys etc on all employees, taking appropriate action where necessary. Complete schedules to support the needs of the business, in line with the company policy. To achieve KPI's and audits. Ensure employee training is completed in line with launches, refreshed and in line with company policy. To implement appropriate marketing/promotional activities to maximise revenue opportunities. To monitor and analyse machine income levels and recommend appropriate action to maximise revenue. 	<p>Cluster Managers demonstrate and apply the following:</p> <ul style="list-style-type: none"> Support the Area reporting in to the Area Manager. Responsibility of a Cluster of venues with the VMs reporting into the Cluster Manager. To monitor and analyse Area performance and recommend appropriate action to maximise revenue opportunities through regular KPI meetings. 	<p>Area Managers demonstrate and apply the following:</p> <ul style="list-style-type: none"> Review Area activity in relation to promotional activity and customer journey to improve performance. Work collaboratively with other functions in the operation to deliver the best customer experience and results. To monitor and analyse Area performance and recommend appropriate action to maximise revenue opportunities through regular KPI meetings. Attend and present at Sales Meetings highlighting area performance and future plans. Hold regular Area Meetings to discuss performance and share best practice through the team. To conduct regular Audit checks and take appropriate action where necessary

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
TECHNICAL SKILLS	<ul style="list-style-type: none"> To ensure that the venue housekeeping is of the highest possible standards at all times. To routinely clean all AGC equipment both before and during trading hours to ensure customers receive a high standard of presentation of equipment at all times. To acquire and maintain a high level of machine knowledge both product and technical. To report machine faults in line with company procedures using the relevant escalation process. To report machine faults in line with company procedures using the relevant escalation process. 	<ul style="list-style-type: none"> Responsible for completing the venue refresh following all company security procedures. Responsible for refilling and maintaining the float level of the venue GeWeTE and ATM following all company security procedures. Responsible for completing MS9 Float Check ensuring all sections are completed accurately. Ensure all paperwork is completed accurately as well as declared on MARS. To take full responsibility for the opening, trading, and closure of the venue in the absence of a Venue Manager/Supervisor. Ensure the venue is set up to the required standard. Understand the implication of the bingo equipment failing and how to manually run a game in venue. Knows how to use the bingo equipment and follow the process to run a manual bingo game. 	<ul style="list-style-type: none"> To ensure venue cash collections are carried out in a timely and accurate manner, in accordance with Company procedures. Investigate any exceptions, promptly taking remedial action, as necessary. To assist in security investigations, as necessary. To deal with the day-to-day problems arising from employees within the venue. To respond to alarm activation's and take appropriate action. To ensure at all times safety of all employees together with those members of the public visiting the venue. 	<ul style="list-style-type: none"> Effectively manage a team to ensure all company monies is secured and reconciled weekly following all relevant company security procedures. Investigate any exceptions, promptly taking appropriate remedial action, as necessary. To ensure a good working environment is established, in order to obtain the maximum commitment and productivity of employees. To be actively involved in the recruitment of employees, ensuring that all applications are dealt with in a timely manner and in accordance with current legislation and company policy. 	<ul style="list-style-type: none"> To ensure that all newly recruited employees receive a full induction on commencement and are trained in all aspects of venue operation and are booked onto relevant courses to support customer service and product knowledge. To undertake team briefings as and when required ensuring that records are made and maintained. To deal with any instances of poor performance, misconduct or gross misconduct ensuring appropriate action is taken, this includes referral the Cluster/Area Manager. Complete performance reviews in line with company policy. To hold regular assessments of security procedures in liaison with the Cluster/Area Manager and where appropriate, identify potential weakness/threats. 	<ul style="list-style-type: none"> Support the Area Manager. Have responsibility of multiple sites reporting back into the Area Manager. To conduct regular Audit checks and take appropriate action where necessary. 	<ul style="list-style-type: none"> Prioritisation of key tasks within the Area. Respond to complex complaints and appropriately action responses. Analyse Mars system and have a clear knowledge on how to track performance data and formulate plans alongside the Cluster/VM to maximise profits. Manage disciplinary/appeals/grievance procedures. Apply the requirements of PML.

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
ASSIGNED E-LEARNING	<ul style="list-style-type: none"> • Workday Training Course • Complaint Handling • Compliance Essentials – Equality & Diversity 1.0 (UK) • Age Verification • Safeguarding Children & Vulnerable People • GDPR Essentials • Essentials of Compliance • Leading Learning – Health & Safety at Work 1.0 • Manual Handling 3.0 • Fire Safety Awareness 3.0 (UK) • Food Safety and Hygiene – Allergen Awareness 3.0 (UK) • Food Safety and Hygiene – Catering Level 2 3.0 (UK) • Lone Working • Communicating Effectively 3.0 • Barriers to Communication Success – Part 1 2.0 	<ul style="list-style-type: none"> • See Previous 	<ul style="list-style-type: none"> • Relevant Workday Training Courses • Right to Work 	<ul style="list-style-type: none"> • Relevant Workday Training Courses • Food Safety and Hygiene – Allergen Awareness 4.0 (UK) • Food Safety and Hygiene – Supervisors Level 3 3.0 (UK) 	<ul style="list-style-type: none"> • Relevant Workday Training Courses 	<ul style="list-style-type: none"> • Relevant Workday Training Courses 	<ul style="list-style-type: none"> • Relevant Workday Training Courses
AVAILABLE TRAINING RESOURCES	<ul style="list-style-type: none"> • Back to Basics Resource Pack • Understanding Our Customers Resource Pack 	<ul style="list-style-type: none"> • See Previous 	<ul style="list-style-type: none"> • Management Essentials (3 Day Course) 	<ul style="list-style-type: none"> • Investigatory Training (1 Day Course) 	<ul style="list-style-type: none"> • Disciplinary Training (1 Day Course) 	<ul style="list-style-type: none"> • Finance • Coaching • Situational Leadership • Marketing • Delegation/Time Management • Audit • Compliance/Complaint Handling/PML 	<ul style="list-style-type: none"> • IML Level 5
POTENTIAL TRAINING RESOURCES	<ul style="list-style-type: none"> • Techniques to Handle Conflict and Escalation 	<ul style="list-style-type: none"> • See Previous 	<ul style="list-style-type: none"> • Mars • Train the Trainer • Feedback – Correcting Performance 	<ul style="list-style-type: none"> • Commercial Awareness • Coaching 	<ul style="list-style-type: none"> • Reviews • Store Checker 		<ul style="list-style-type: none"> • Goal Setting/ SMART Objectives • Finance • Presentation Skills • Leadership and Vision • Influencing

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
COMPETENCIES E LEARNING	<ul style="list-style-type: none"> Customer Communications 1.0 Be assertive the right way 3.0 Leading Learning - Customer Service Excellence 1.0 Communication and Social Skills - Receiving Feedback 2.0 Customer Service Success 2.0 Leading Learning - Self-Confidence 1.0 Career Goals - Finding Purpose in Your Career 3.0 How to Behave at Work Parties - Social Media 3.0 (Global) How to Behave at Work Parties - Drugs and Alcohol 3.0 (Global) Stress Management - Taking Care of Yourself 1.0 How to Behave at Work Parties - Sexual Harassment 3.0 (Global) 	<ul style="list-style-type: none"> See Previous 	<ul style="list-style-type: none"> Clarify Team Expectations 1.0 Innovation 1.0 Be a Change Leader 1.0 Culture Series – Be the Change (For Non-Managers) 1.0 Communicating Effectively 3.0 Feedback and Non-Verbal Communication 1.0 Speaking and Listening 1.0 Communication Styles in CX 1.0 Leading Learning - Fraud Awareness 1.0 Emotional Intelligence 3.0 How to Influence 2.0 Reducing Stress Through Time Management 1.0 Preparing for Tasks Effectively 2.0 Leading Learning - Time Management Tips 1.0 Leading Learning - Productivity and Time Management 1.0 Team Working Excellence 3.0 	See Previous	<ul style="list-style-type: none"> Performance - Goal Setting 1.0 SMART Objectives 3.0 Adapting to Change 1.0 Introduction to Critical Thinking 1.0 Critical Thinking - Evaluating Arguments and Evidence 1.0 Communication Skills all Managers Must Master 2.0 Communication Styles and Emotional Intelligence 2.0 Scalable Customer Relationships 1.0 Motivating Your People and Being a Positive Role Model 2.0 Excellence in Customer Service 2.0 Feedback and Service 1.0 Coaching Skills 4.0 Constructive Feedback 3.0 Creating and Maintaining the Culture of Your Organization 1.0 	<ul style="list-style-type: none"> Setting Sound Goals 1.0 Leadership Suite - Strategy and Pragmatism 1.0 Leading Learning - The Customer Journey 1.0 Leading Learning - Successful Networking 1.0 Personal Development - Networking 2.0 	<ul style="list-style-type: none"> Organizational Strategy 1.0 Utilizing Power and Influence Effectively 1.0 Using Power and Influence Ethically 1.0 Inspirational Leadership 3.0 Handling Conflict and Negotiation Ethically What Makes a Great Place to Work 1.0 Leading Learning - Negotiating Cross Culturally 1.0 Leading Learning - Virtual Negotiation and Influence 1.0 Leading Learning - Negotiation and Influence 1.0 Claim or Create Value in Negotiations 1.0 Master the Art of Negotiating 2.0 Managing the Negotiators' Dilemma 2.0 Negotiation and Influencing People 3.0 Understanding Successful Negotiation 1.0

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
COMPETENCIES E LEARNING (Continued)			<ul style="list-style-type: none"> Leadership Suite - The Accidental Manager 1.0 A Motivators Toolkit 2.0 Employee Motivation - Job Dimensions 1.0 		<ul style="list-style-type: none"> Managing Teams Be Likeable 2.0 Time Management for Managers 1.0 Essential Time Management Tools 1.0 Time Management 2.0 Tools and Knowledge for Successful Plans 1.0 Productivity and Time Management 3.0 Hire Team-Oriented Employees 1.0 Being an Inclusive Leader 1.0 Why Teamwork Works 1.0 Leadership Suite - Managing Different Personalities 1.0 Key Tools and Knowledge for Team Leading 1.0 Become an Effective Leader - Part One 2.0 Become an Effective Leader - Part Two 2.0 The Team and its Members 1.0 Diversity and Inclusion in Teamwork 2.0 		

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
STEP UP LEARNINGS	•	<ul style="list-style-type: none"> • Culture Series – Doing What's Right 1.0 • Culture Series – Setting An Example (For Non-managers) 1.0 • Decision Making Excellence 4.0 	<ul style="list-style-type: none"> • Leadership and Management – Dealing with Difficult Staff 2.0 • Culture Series – Be the Change (For Non-Managers) • Five Tips for New Managers and Supervisors 1.0 • Demystifying Management 1.0 • Introduction to Managing Employee Performance 1.0 • Management Skills – What Does it Take? 1.0 • Leadership Suite – Impostor Syndrome in New Managers 1.0 • Leadership Suite – Peer to leader 	<ul style="list-style-type: none"> • Transitioning to Management – The First Year • Leadership and Management – Coaching Others 2.0 • How to Delegate Effectively 2.0 (US) • Types of Management Styles in an Organization 1.0 • Put On Your Managers Hat • Culture Series – Start the Change (For Managers) • Model the Way 1.0 • Motivation and Job Performance 1.0 	<ul style="list-style-type: none"> • Developing Management Skills 2.0 • Top 10 Mistakes of Managers 1.0 • Active Listening • Flexible Working • Leadership Suite – Trust Building and Empathy • Business Budgeting 1.0 	<ul style="list-style-type: none"> • Leadership versus Management 2.0 • Evolution of Management 1.0 	

INTERNATIONAL CERTIFICATE OF ACCREDITATION



GLOBAL GAMBLING GUIDANCE GROUP

In accordance with the responsible
gaming policies, procedures and
standards set by the Global
Gambling Guidance Group (G4),
Amsterdam, the Netherlands,
accreditation is hereby granted to:

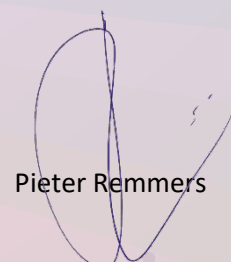
Merkur Casino UK

Audit date(s):
30 October - 3 November

Certificate Number: EG - 00042024
Original Approval: 10 August 2020
Current Certificate: 3 November 2023
Certificate Expiry: 3 November 2026

On behalf of the G4 Foundation:


Jeffrey Derevensky


Pieter Remmers

Vincit qui se vincit **132**



Bingo Express 2

Technical Features Information

Version 1.2 June 2024

INTRODUCTION

Bingo Express 2 is a fully featured scalable Ticket on Demand / Tablet Bingo platform for Bingo licenced premises, packaged up in a standalone small footprint terminal.

The platform allows an operator to deliver, manage and fully report on Ticket on Demand and tablet-based Bingo.

This document describes the technical features and overall architecture of the platform.

BINGO EXPRESS 2 TERMINAL



24 inch operator touch screen with attract mode.
Option for Top screen

Barcode Scanner for ticket check, tablet crediting, login

3" thermal print for Bingo Tickets, TiTo tickets and reports

Electronic Coin Mech

Tito Compatible Note Acceptor

20 Tablet built in charge capability

Optional external charge racks expand capacity. Available in 10, 16 and 32 slot formats.

- Dimensions:
 - o 700mm Width
 - o 550mm Depth
 - o 1850 Height (w/o optional top screen)
- Rear casters for local manoeuvring
- Power Supply 2 x 230v 13 amp sockets
 - o Charge Rack (timed supply)
 - o PC and Server (24 Hour supply)
- Up to 8 x RJ45 network connections
- Public Display Output on HDMI (Required for LCCP)
 - o Operator to provide screens / distribution

Optional Chip and Pin functionality
Currently integrated using Ocius Sentinel payment solution, with a Verifone VX820 PED. Merchant accounts to be supplied and held by operator. All transactions, processing accounts and charges are operator's responsibility

Optional Membership Scan Point functionality. Members can scan a virtual or plastic card to register their visit.

GAMING TABLETS (OPTIONAL)

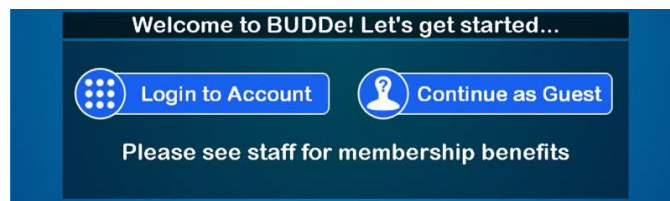
The Bingo Express 2 platform uses Lenovo tablets which offer excellent performance, reliability and battery life.



- Android Operating System
 - Locked down for security
- 10.1" Full HD Screen
- 7000 mAh battery
- Over 10 hours battery life
- Adaptive charging prolongs the life of devices and provides an average of 20% per hour charge rates
- Magnetic charge cables
- Remote Software management
- Customisable Skins
- Advertising whilst idle
- Built in kick stand
- Vertical or Horizontal orientation

GUEST OR MEMBERSHIP LOGIN

The system supports full membership integration if required. Users can log on to the tablet with a membership number and secure PIN, or where appropriate securely login as a guest.



Membership login allows storage of customer preferences and a personal account balance to be held on the server. For Bingo variant games it also enables catch-up play, where a player can purchase tickets one day and play them off later.

TITO

- GBG standard TiTo functionality
- Supported versions:
 - o 1.3(a)
 - o 2.1
- Option to disable Ticket In if required.

INFRASTRUCTURE – NETWORKS

The platform uses a server-based architecture that is fully scalable. For the Bingo Express 2 application the terminal is self-contained, housing the server and separate control PC for the user interface and public display output.

The system provides support for up to three networks depending on the configuration of the operator's IT infrastructure.

1. Main network
 - Internet connected for secure connection to central Bingo Express server, support and email reports.
 - Subject to provision of suitable V-Lan's can carry TiTo
2. Gaming Network (tablet sites only)
 - Independent to other networks
 - Internal WiFi access point
 - POE outputs for multiple external access points (scalable to suit all venue sizes)
3. TiTo Network (Optional)
 - Allows an independent network connection for TiTo, if this cannot be accessed on main network via operator V-Lan.

USERS AND SECURITY

To keep the system secure, each member of staff is supplied with a unique PIN number and their own staff card that must be entered or scanned before full access to the Bingo Express 2 application is permitted.

Two levels of user access are provided, Manager and Staff, giving access only to appropriate functions.

BINGO EXPRESS 2 INTERFACE

The Bingo Express 2 system is multi-functional, allowing a player the option to play Bingo on paper tickets (printed on demand) or on tablets (where fitted).

The intuitive interface not only allows users to view and buy a full day's worth of paper Bingo tickets, but also allows users to Add or Withdraw credit on their tablet account directly without the need for staff interaction.

The screenshot displays the Bingo Express 2 interface with the following callouts and features:

- Next Up Game info:** Points to the header "Next Game - Americana Starts In 19m".
- Game filters:** Points to the row of game icons at the top.
- Terminal Credit Balance, add with Notes, coins or TiTo:** Points to the "CREDIT" section showing £14.00.
- Add Tablet Credit function:** Points to the "+" button in the credit section.
- Withdraw Tablet Credit function:** Points to the "Withdraw" button.
- Full Game Schedule with time/countdown:** Points to the main game schedule table.
- Game Info available on drop-down:** Points to the game icons in the schedule table.
- Game pricing and purchase via basket:** Points to the price and "+" buttons in the schedule table.
- Local Games not available to purchase till X minutes before start:** Points to the "PYO" (Pay to Order) status in the schedule table.
- Press Buy to commit your purchase and print tickets:** Points to the "BUY TICKETS" button.
- Collection via TiTo:** Points to the "COLLECT" button.

Time / Countdown	Game	Price	Buy	Remove	Balance	Status
11:00 Played	Americana	£2.00	+	-	£0.00	
11:10 Played	Party Bingo Extra	£2.00	+	-	£0.00	
11:30 19m	Americana	£2.00	+	-	£0.00	
11:38 27m	Easy Liner	£1.00	+	-	£0.00	
11:45 34m	Rainbow	£0.00	+	-	£0.00	
11:52 41m	Easy Liner	£1.00	+	-	£0.00	
12:00 49m	Americana	£2.00	+	-	£0.00	
12:15 01h 04m	Super 6	£1.00	+	-	£0.00	PYO
12:22 01h 11m	Super 6	£1.00	+	-	£0.00	PYO
12:30 01h 19m	Triple Chance Link	£1.00	+	-	£0.00	

Time / Countdown **TOTAL** **£0.00**

BUY TICKETS **COLLECT**

Instructions:

- Touch **+** alongside the game of your choice to add a ticket to your basket.
- Touch **-** if you wish to remove a ticket from your basket.
- Insert sufficient credit to cover the total value of your chosen tickets.
- Sessions contain multiple pages of games for an all inclusive price.
- Press the **'BUY TICKETS'** button to confirm your purchase and print your ticket(s).
- Press any game icon or session to expand game information and prizes.

REPORTING ACCOUNTS AND AUDITS

The server-based backend is fully LCCP compliant for both Bingo and Slots content in suitably licenced premises.

The system supports true account-based play with secure PIN controlled access if required. Optionally it can link to NRM's membership backend or others through an API. This allows automatic syncing of customer details and self-exclusion status.

Where membership login/account-based play is not required operators can use guest accounts; these are tied to a tablet with a secure algorithmically generated PIN. They are audited in just the same way as an individual membership account would be, but must be cashed out at the end of a session otherwise credit is forfeited.

A full timestamped breakdown of all transactions to and from accounts is available from the interface.

The system has a configurable maximum AML credit limit and the latest version of tablet software includes safer gambling controls for the users.

A promo credit system is available, accessed through the Managers level login. Promo credit amounts can be setup as 'packages' and applied to accounts individually by scanning a tablet/membership card. Promo credit can't be cashed out, can be set with an expiry date and is fully audited.

The system audits on daily/sessional basis. For Ticket on Demand Bingo operations there will typically be a single session per day. The system tracks the last seen dates and times of each tablet.

At the end of each day/session printed (and optional Email) reports are generated:

Bingo/Terminal Activity:

- Non-resetting meters for:
 - o Cash In (Notes and Coins)
 - o TiTo (voucher) out
 - o Tito (voucher) in
- All Played Bingo Game, sold, won and void
 - o Separate entries for Paper and Electronic sales.

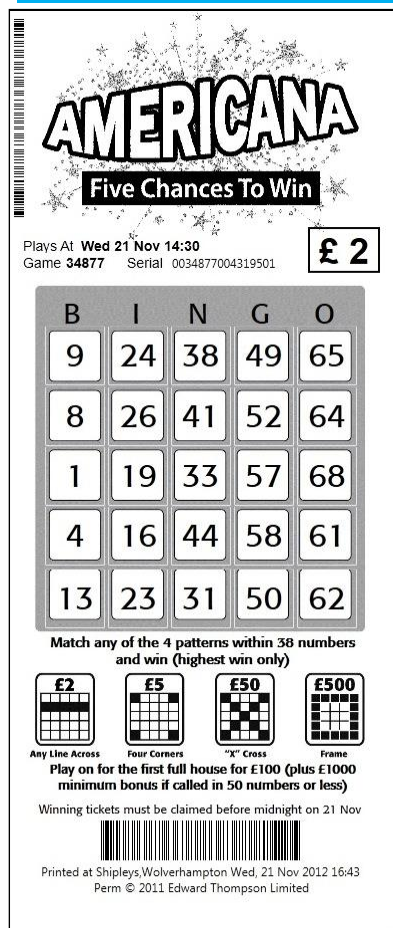
Tablet Activity is separately reported, including:

- Full session start/finish times and dates
- Total credits applied to Tablets
- Staked and won figures broken down for each game type
- Total credits withdrawn from the tablets

SAMPLE BINGO CONTENT

Bingo Games are scheduled typically every 6 -10 minutes, they start and play automatically with all required game information shown on public screens. Games are constantly reviewed and the schedule can vary. At the time of writing the following games are scheduled and enabled for both paper ticket and tablet.

Americana – Classic 75 number style bingo game



Americana is a two part game with a guaranteed Full House winner every time plus a fixed odds element.

It does not have to be played live, but tickets must be marked and be validated within the timeframe identified in the game rules in force at the time.

Game times will be displayed on the Bingo Express screen(s). The game is 'linked', with tickets sold in a number of venues and not just in this site.

The Americana ticket has a 5 by 5 grid of 25 numbers between 1 and 75. Prizes are awarded for the stages as follows:

- After 38 numbers are called, any tickets which match the following patterns win prizes as shown (highest prize only paid):
 - Any complete horizontal line across of five numbers eg £2
 - Four corners eg £10
 - St Andrews Cross (X shape) eg £50
 - Picture Frame (all numbers on the outside edges) eg £500
- The game then continues for a full house, and the first ticket to achieve this across all participating sites wins a defined prize. If two or more tickets have a full house on the same lowest number of calls, then the defined prize is split equally between those winning tickets.

The game features an additional progressive prize available on the full house if it is achieved in less than a specified number of calls. The number of calls to win the progressive prize is normally 50, but may be varied during promotional periods.

The value of the progressive prize will be displayed on the Bingo Express screen(s) at the start of each game.

In the event of a win the progressive prize is split as follows:

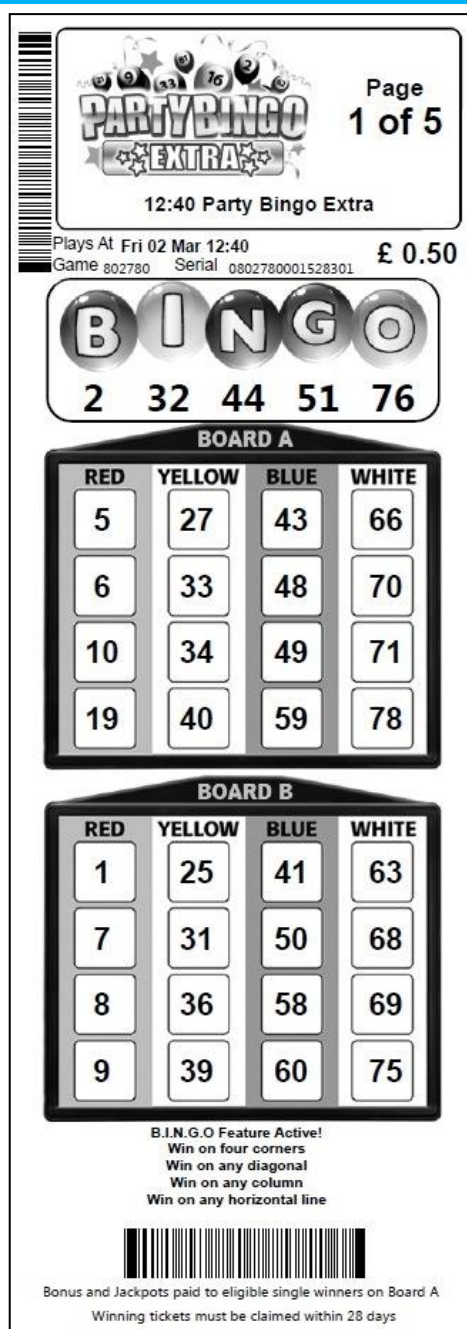
- The full house winner takes 50% of the advertised Jackpot value
- The remaining 50% to be shared equally between ALL ticket holders for the Jackpot winning game

At game time numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played; players can mark their tickets as the game is being played. If you think you have won, just scan your ticket or ask a member of staff to check it for you.

Alternatively, players can mark their ticket from a printed call sequence, available directly from the terminal.

Players are required to confirm that they have marked their ticket when it is validated. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point.

Party Bingo Extra - 80 Number Cash Bingo style



Page 1 of 5

12:40 Party Bingo Extra

Plays At Fri 02 Mar 12:40
Game 802780 Serial 0802780001528301 £ 0.50

BINGO
2 32 44 51 76

BOARD A

RED	YELLOW	BLUE	WHITE
5	27	43	66
6	33	48	70
10	34	49	71
19	40	59	78

BOARD B

RED	YELLOW	BLUE	WHITE
1	25	41	63
7	31	50	68
8	36	58	69
9	39	60	75

B.I.N.G.O Feature Active!
Win on four corners
Win on any diagonal
Win on any column
Win on any horizontal line

Bonus and Jackpots paid to eligible single winners on Board A.
Winning tickets must be claimed within 28 days

1. Party Bingo Extra operates as a Bingo Variant game whereby tickets do not have to be played live and can be validated up to 28 days from the day in which the game has been started. Game times will be displayed on the Bingo Express screen(s). Game tickets are sold in a number of venues and not just in this site.

2. The Party Bingo Extra game includes two types of tickets.

a. Type 1 includes the B.I.N.G.O feature and allows for win patterns of any horizontal, vertical or diagonal line of four numbers or four outside corner numbers.

b. Type 2 does not include the B.I.N.G.O feature and plays for either a Full House or Picture frame. Optionally there can also be Jackpots for either prize.

Type 1 Ticket: Line and Corners Game

3. The Type 1 Party Bingo Extra tickets have two parts:

a. Two 4 by 4 grids of 16 numbers out of a range from 1 to 80.
b. One B.I.N.G.O feature with 5 numbers one each from the ranges 1-16, 17-32, 33-48, 49-64, 65-80.

4. Random numbers are called from the full range of 1- 80 numbers until the first card across all participating sites matches one of the following patterns:

a. Any horizontal, vertical or diagonal line of four numbers.
b. All four outside corner numbers.
c. B.I.N.G.O feature - all numbers under the B.I.N.G.O.

5. The main prize is set in advance. Once a minimum prize value has been satisfied the prize value will increase proportionally with the number of tickets sold. Prizes may be different for wins on Board A and Board B.

6. The optional BONUS feature allows a multiplier on a particular win, so for example a blue line bonus means if a ticket wins on a blue line then they get the main prize multiplied by the bonus multiplier.

7. BONUS wins are only possible on the TOP board (Board A).

8. B.I.N.G.O feature and BONUS wins are only paid to a single winner, split wins default back to the Main Prize.


9. If two or more tickets match a pattern on the same number of calls, then the Main prize is split equally between those winning tickets.

10. Should a player mark all 5 numbers of their B.I.N.G.O feature before the main prize is claimed, that player will be awarded the feature prize.

11. The game will be closed once a main prize or a B.I.N.G.O feature winner has been found. A main prize claim made on the same number of calls as a feature win will result in the Main prize being shared.

12. Numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played. Called numbers for any game on the same day are available to any player with a ticket for that game via the terminal.

13. The cost of each type 1 Party Bingo Extra ticket is clearly shown on the ticket, a portion of which is retained from each ticket to fund the feature prize which is paid out in the event of a player marking all five numbers associated with the B.I.N.G.O feature on their ticket before the game is closed. The value of the prize will be displayed on the Bingo Express screen(s) at the start of each Party Bingo Extra game.



12:40 Party Bingo Extra

Page
5 of 5

Plays At Fri 02 Mar 12:48
Game 802784 Serial 0802784001528701

£ 1.50


BOARD A

RED	YELLOW	BLUE	WHITE
14	23	41	61
15	24	47	69
16	28	50	72
19	30	58	74

BOARD B

RED	YELLOW	BLUE	WHITE
1	21	42	66
5	26	43	68
9	31	49	76
17	32	54	77

Win on a full house
Full House Jackpot Active on Board A



Bonus and Jackpots paid to eligible single winners on Board A
Winning tickets must be claimed within 28 days

Type 2 Ticket: Full House Game

14. The Type 2 Party Bingo Extra ticket has one part:

- a. Two 4 by 4 grids of 16 numbers out of a range from 1 to 80.
- b. Type 2 tickets do not include the B.I.N.G.O feature and play for either a Full House or Picture Frame pattern only. Optionally there can be Jackpots for either prize. Number of calls to win the jackpot is displayed during the game.

c. Random numbers are called from the full range of 1- 80 numbers until the first card across all participating sites marks the winning pattern.

15. The main prize is set in advance. Once a minimum prize value has been satisfied the prize value will increase proportionally with the number of tickets sold. Prizes may be different for wins on Board A and Board B.

16. Jackpots are only paid to a single winner, split win defaults to the Main prize.

17. Jackpots can only be won on the Top card (Board A).

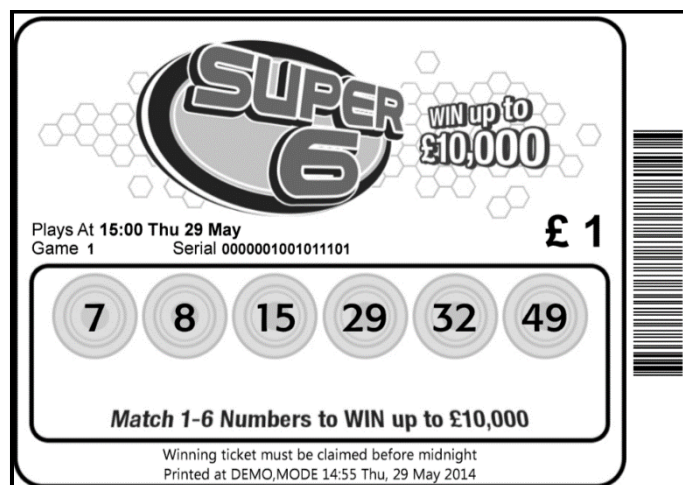
18. The cost of each type 2 Party Bingo Extra ticket is clearly shown on the ticket, a portion of which is retained from each ticket to fund the Jackpot.

19. The total number of tickets sold for any game within the last 7 days is available from staff if required.

20. Players are required to confirm that they have marked their ticket when it is validated.

21. Winning tickets must be verified within 28 days from the date that the game started, be presented wholly intact and given up to a member of staff. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point. Tickets presented after 28 days will be void.

SUPER 6 – Pick Your Own Numbers Fixed Odds Game



1. SUPER 6 operates as a Bingo Variant game whereby tickets do not have to be played live and can be validated up to 28 days after the game has been started. Game times will be displayed on the Bingo Express screen(s). Game tickets are sold in a number of venues and not just in this site.
2. The Super 6 ticket has six lucky numbers, these can be any six unique numbers from the range 1- 49.
3. Players have the option to allow the system to allocate six lucky numbers or can choose their own numbers. In either event the system will ensure that the permutation of six numbers on every ticket is unique for each game; players will be requested to re-select if a duplicate ticket exists.
4. Numbers are called randomly from the full range of 1- 49 and there are prizes for matching all six lucky numbers before the prize grid is fully populated.
5. Prizes are awarded according to the number of calls released at the point when a player's last number is matched. Prizes will be clearly displayed on the game screen and could be varied from time to time. Prizes will be highest for players matching all six numbers in the first 6 calls and will typically reduce for each successive call down to the last prize. There may be multiple different winning tickets on any single game.
6. Prizes are displayed based on the win amounts for a £1 ticket. Winners on other value tickets will receive a proportional prize, for example a 50p winning ticket will receive 50% of the displayed prize.
7. Numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played. Called numbers for a game within the last 28 days are available to ticket holders from staff on request.
8. Super 6 tickets cost 50p or £1 each, a portion of which is retained from each ticket to fund a variable progressive bonus prize which is paid out in full for £1 tickets (or in part for tickets less than £1) as an additional amount for matching 6 numbers on a specific number of a calls. The value of the progressive prize will be displayed on the Bingo Express screen(s) at the start of each Super 6 game.
9. The total number of tickets sold for any game within the last 7 days is available from staff if required.
10. Players are required to confirm that they have marked their ticket when it is validated.
11. Winning tickets must be verified within 28 days of the start of the game and be presented wholly intact and given up to a member of staff. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point. Tickets presented after 28 days will be void.

Super 6 Prize Table:

Prizes are awarded according to the number of calls released at the point when a player's last number is matched.

Prizes will be clearly displayed on the game screen and could be varied from time to time.

The Prize Table correct as at the 21st June 2024 is as follows:

Call No:	Prize:		Call No:	Prize:		Call No:	Prize:
1	-		13	£250		25	£8
2	-		14	£250		26	£8
3	-		15	£100		27	£7
4	-		16	£100		28	£7
5	-		17	£75		29	£5
6	£10,000		18	£75		30	£5
7	£5,000		19	£50		31	£3
8	£2,000		20	£50		32	£3
9	£1,000		21	£25		33	£2
10	£1,000*		22	£25		34	£2
11	£500		23	£10		35	£2
12	£500		24	£10		36	£1

All prizes shown for a £1 Ticket.

* Plus Super Bonus Jackpot

Rainbow Bingo – 80 Number Local Game

A key function of the Bingo Express 2 terminal is its ability to run local Bingo games. With Rainbow Bingo all aspects of pricing, win conditions and prizes are controlled locally.

The games appear between other Bingo Express games on the schedule; they typically will be played twice an hour at 25 and 55 minutes past, but can be available at any time.

The settings are accessed directly on the terminal via the purple highlighted buttons below:

Admin > Config > Rainbow

The screenshot shows the terminal interface for the Rainbow Bingo game. The top navigation bar includes buttons for Main, Caller, Validate, Admin (highlighted), Mute, and Logout. Below this is a secondary bar with Printing, Reports, Config (highlighted), Users, and Setup. The main area displays various settings for the Rainbow game, including Terminal Settings (Logout Timer: 6m, Barcode Timeout: 10s, Allow Manual Entry: OFF), Default Printer (PRINTER 1), and a large central panel for game configuration. This panel includes fields for Ticket Price (£0.00), Main Prize Min (£5.00), Per Ticket Prize (£0.00), Jackpot Prize (£10.00), Min Calls (0), and Max Calls (10). It also features a 'Printer' dropdown (PRINTER 1), a 'Volume' control (12), and a 'Test' button. A 'Save' button is located in the top right corner of the settings panel. The interface is designed with a dark background and colorful highlights for the active sections.

Ticket Price

- The price per ticket.
- The price can be a minimum of £0.00 for a free game and currently has no upper limit.
- Ticket price changes do not affect games which already have sales.

Main Prize Min

- This is the minimum amount paid out for each game.
- The Rainbow Bingo prize is given to the first player to mark one number in each coloured column.
- This value will be shared in the event of multiple winners.

Per Ticket Prize

- The contribution per ticket towards the main prize.
- The main prize value displayed will remain at the minimum value until total contribution across all tickets sold exceeds that value.
- If the per ticket prize is set to £0.00 then the Main Prize Min remains fixed.

Jackpot Prize

- This is won if a customer marks at least one number from each coloured column within the jackpot win criteria.
- The jackpot is not shared, it is only paid to a single eligible winner.
- If there is more than one winner even if they are within the jackpot criteria, they share the main prize only.
- If Jackpot Prize is set to £0.00 then there is no Jackpot for the game.

Min Calls

- The minimum number of calls required to win the jackpot.

Max Calls

- The maximum number of calls to win the jackpot

Jackpot win criteria examples:

Min Calls	Max Calls	Win Parameters
1	50	Win between 1 & 50 Calls
0	50	50 Calls or Less
50	50	Win on 50 Calls

Playing the Game

Multiple instances of the game will appear on the Bingo Express schedule, with sales opening typically 15 minutes before each game.



Tickets can be purchased as normal by adding them to your basket and pressing 'Buy and Print'.

In self-service sites if the ticket cost is Free (£0), then tickets can only be printed by a logged in member of staff. Tablets will be limited to a single ticket if the cost is Free.

At Game time the game will start and run through automatically until a winner is found.

Alternatively, staff can control the speed of the game using the controls on the 'Caller' tab.

Winners will be declared automatically at the end of the game and can be checked up to 28 days later by scanning the ticket.

In Game Screen:





Merkur Slots UK Limited - Instruction history

1. Since October 2020 Leveche Associates Ltd have been instructed to conduct covert observations on multiple Merkur Slots UK Ltd premises.
2. Leveche Associates Ltd is an independent company dealing with Licensing and Security in the private sector. With the multiple visits has come a good working knowledge of how Merkur Slots UK Ltd operate and the standards they seek to achieve.
3. Leveche Associates Company Directors are former police officers with over 60 years policing experience. With many years of security and licensing related work, our Directors hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003 and are registered Close Protection operatives under the Security Industry Authority (SIA).
4. Leveche Associates Ltd have carried out observations on premises focusing on criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general surrounding environment.
5. Generally the premises visited are situated in busy commercial and retail shopping areas with transport facilities and other licensed premises nearby. Many of the visits were relevant to those Merkur Slots venues looking to operate extended opening hours.
6. The following table shows the operational Merkur Slots UK Ltd venues visited by Leveche Associates Ltd in the last five years. Merkur Slots UK Ltd have also used the trading names of Cashino Gaming and Merkur Cashino.

	Date	Venue	Address
1	24/10/2020	Cashino Gaming	Tooting High Street SW17 0SP
2	29/10/2020	Cashino Gaming	Neasden NW10 0AD
3	08/01/2021	Merkur Slots	Plaistow E13 9AU
4	11/02/2021	Merkur Slots	Plaistow E13 9AU
5	11/02/2021	Merkur Slots	Barking IG11 8EQ
6	01/06/2021	Merkur Slots	Plaistow E13 9AU
7	01/06/2021	Merkur Slots	East Ham E6 1JB
8	01/06/2021	Merkur Slots	Holloway N7 6QA

9	01/06/2021	Merkur Slots	Wood Green N22 6BB
10	02/06/2021	Merkur Cashino	Neasden NW10 0AD
11	02/06/2021	Merkur Cashino	Wembley HA9 7BH
12	02/06/2021	Merkur Slots	North Finchley N12 8PT
13	03/06/2021	Merkur Cashino	Edmonton Green N9 0TQ
14	08/06/2021	Merkur Cashino	Waltham Cross EN8 7LA
15	27/10/2021	Merkur Slots	Southall UB2 4DQ
16	27/10/2021	Merkur Cashino	Southall UB1 1PS
17	29/10/2021	Merkur Slots	Southall UB2 4DQ
18	16/12/2021	Merkur Slots	North Finchley N12 8PT
19	17/12/2021	Merkur Slots	North Finchley N12 8PT
20	04/03/2022	Merkur Slots	Waltham Cross EN8 7LA
21	05/03/2022	Merkur Slots	Waltham Cross EN8 7LA
22	25/05/2022	Merkur Slots	South Shields NE33 1HZ
23	26/05/2022	Merkur Slots	South Shields NE33 1HZ
24	27/05/2022	Merkur Slots	South Shields NE33 1HZ
25	28/05/2022	Merkur Slots	South Shields NE33 1HZ
26	03/06/2022	Merkur Slots	Southall UB2 4DQ
27	24/06/2022	Merkur Slots	Hounslow TW3 1EA
28	25/06/2022	Merkur Slots	Stoke Newington N16 0LH
29	25/06/2022	Merkur Slots	Hounslow TW3 1EA
30	26/06/2022	Merkur Slots	Stoke Newington N16 0LH
31	10/08/2022	Merkur Cashino	Hatfield AL10 0JX
32	17/08/2022	Merkur Cashino	Tottenham Court Road W1T 2HA
33	25/08/2022	Merkur Slots	Hounslow TW3 1LR
34	27/08/2022	Merkur Slots	Wood Green N22 6BB
35	27/08/2022	Merkur Slots	Streatham High Road SW16 1HT
36	27/08/2022	Merkur Slots	Streatham Hill SW2 4RD
37	01/09/2022	Merkur Slots	Leeds LS9 6AP
38	01/09/2022	Merkur Slots	Edgware Road W2 2DS
39	03/09/2022	Merkur Slots	Holloway N7 6QA
40	08/09/2022	Merkur Slots	Plaistow E13 9AU
41	09/09/2022	Merkur Slots	Burnt Oak Broadway HA8 5EP
42	10/09/2022	Merkur Slots	Burnt Oak Broadway HA8 5EP
43	15/09/2022	Merkur Slots	Streatham High Road SW16 1HT
44	15/09/2022	Merkur Slots	Edgware Road W2 2DS
45	17/09/2022	Merkur Cashino	Tottenham Court Road W1T 2HA
46	22/09/2022	Merkur Cashino	Edmonton Green N9 0TQ
47	18/11/2022	Merkur Slots	Waterloo SE1 7AE
48	19/05/2023	Merkur Slots	Brighton BN2 1RE
49	19/05/2023	Merkur Slots	Worcester WR1 3PZ
50	02/06/2023	Merkur Cashino	Barking IG11 8EQ
51	16/06/2023	Merkur Slots	Streatham High Road SW16 1HT
52	17/06/2023	Merkur Slots	Streatham High Road SW16 1HT
53	23/06/2023	Merkur Slots	Stockton-on-Tees TS18 1BB
54	21/07/2023	Merkur Slots	Newcastle upon Tyne NE1 5PF
55	04/08/2023	Merkur Slots	Welling DA16 3PY
56	09/06/2024	Merkur Slots	Peterborough PE1 2ND
57	09/06/2024	Merkur Slots	Peterborough PE1 2PF
58	15/06/2024	Merkur Slots	Newcastle upon Tyne NE1 5PF
59	28/06/2024	Merkur Slots	Peterborough PE1 2ND
60	28/06/2024	Merkur Slots	Peterborough PE1 2PF
61	22/03/2025	Merkur Slots	Southampton SO14 7FG
62	28/03/2025	Merkur Slots	Chingford E4 8DD
63	04/04/2025	Merkur Slots	Glasgow G2 8BT
64	04/04/2025	Merkur Slots	Liverpool L1 1EB
65	05/04/2025	Merkur Slots	Newcastle NE1 5PF
66	05/04/2025	Merkur Slots	Birmingham B4 6AD

67	06/04/2025	Merkur Slots	Great Yarmouth NR30 2AF
68	06/04/2025	Merkur Slots	Cwmbran NP44 1PL
69	18/04/2025	Merkur Slots	Southall UB1 1PS
70	19/04/2025	Merkur Slots	Clapham SW4 7TB

7. The observations found Merkur premises to be well run and operating correctly with no issues. The front exterior display of operating premises was clean, well maintained and looked professional, signage was clear and bright.
8. There are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. People entering these premises were vetted before being allowed entry to ensure drunken or other vulnerable people didn't gain access. Some premises employed a door supervisor to control entry. They were smartly dressed and displayed Security Industry Authority (SIA) badges.
9. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers using the premises.
10. The areas where Merkur Slots premises are established tend to be well served by public transport with a variety of bus routes, underground trains and taxis. In most cases there is ample car parking available. These transport mediums allow the public to arrive and leave an area safely and quickly.
11. For the 24-hour premises, throughout the night customers visited in small numbers without any incidents of crime and disorder or anti-social behaviour. There was no evidence of anyone loitering around the premises. Customers arriving went straight into the premises and customers leaving generally left the area straight away.
12. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - Challenge 25 Policy – Strict Over 18 Policy. The venues operate a Challenge 25 Policy whereby photographic ID is required to gain entry, this was seen during observations.
 - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
13. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention Standards.

14. Leveche Associates Limited have spent a significant amount of time visiting Merkur Slots premises and examining associated crime data with a total of 70 individual visits to 40 separate premises. Having visited multiple gaming premises across the United Kingdom it has been established that the Merkur Slots UK limited premises are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. Effective regulation and oversight of the premises ensures potentially negative behaviour is prevented and ensures responsible gaming practices. Clearly, Merkur Slots UK Ltd are one of the stand out operators in the gaming industry.
15. The opinions expressed in this report are made in good faith and with best judgement.

Leveche Associates Limited
24th April 2025



Observations Report

Merkur Slots

**12 The Broadway
Southall
UB1 1PS**

Executive Summary

1. Leveche Associates Ltd have been instructed by Merkur Slots UK Ltd to undertake observations in relation to their Adult Gaming Centre (AGC) premises located at Merkur Slots 12 The Broadway Southall UB1 1PS and to report on the findings. The premises trade 24-hrs a day 7-days a week.
2. Observations were conducted on the premises and the surrounding area on Thursday 17th April from 21:55hrs to 06:10hrs on Friday 18th April 2025 and focused on the impact of the Merkur premises operating in the area overnight.
3. The Merkur Slots premises is located on The Broadway near the junction with Lady Margaret Road, High Street and South Road amongst other retail premises in Southall. The road and footway outside the premises generally run east to west. Vehicular and foot traffic can travel in either direction. The street is a popular destination for both locals and visitors as it has a wide variety of South Asian shops and restaurants. There are no other adult gaming centres nearby in the observation area however, Merkur Slots have another premises at 37 - 39 King Street Southall UB2 4DQ which operates 24-hrs a day 7-days a week.
4. On Friday 18th April 2025 between 03:19hrs and 04:02hrs a covert visit was made to Merkur Slots The Broadway. Observations showed the premises to be well run and operating correctly with no issues.
5. From the observations it is clear that operating the Merkur Slots premises at 12 The Broadway Southall does not cause anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the

environment, local infrastructure or wider local community. From 01:00hrs the observations showed the immediate area around Merkur Slots was quiet with very little to no foot traffic although the road had a regular flow of vehicular traffic.

6. There was no anti-social behaviour, criminality, public order or noise issues and no young people or other persons that could be considered vulnerable seen frequenting the premises or the immediate surrounding area. In the observations area there were no public houses, nightclubs or late licensed bars however, there was a McDonalds Restaurant and other fast-food outlets which open until the early hours of the morning.
7. The customers from these premises left the area and did not migrate to Merkur Slots in The Broadway.
8. From the observations there was no evidence that the venue attracts levels of crime and disorder that would be problematic and undermine the quality of community life.

Introduction

9. Leveche Associates Limited were instructed to carry out observations for the area relevant to the Merkur Slots UK Ltd premises at 12 The Broadway Southall UB1 1PS.
10. Merkur Slots UK Ltd have an Adult Gaming Centre Licence under the Gambling Act 2005 allowing them to operate the premises for 24-hrs a day 7- days a week.
11. Where reference is made to an Adult Gaming Centre this includes premises both licensed as Adult Gaming Centres and Bingo premises.
12. The premises come under the jurisdiction of the Metropolitan Police Service and Ealing Council.

Operative Personal Summary – Stuart Jenkins

13. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
14. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer

for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – Marine Duty Officer, licensing lead for the MPU, licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.

15. I have worked as an Independent Consultant in the Licensing and Security Industry for the last six years.
16. During my police career I was a Home Office qualified Crime Prevention Design Advisor.
17. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
18. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations – Site Assessment

19. Observations were carried out at Merkur Slots UK Ltd premises at Merkur Slots 12 The Broadway Southall UB1 1PS and the surrounding area.
20. The Merkur Slots premises is located on The Broadway near the junction with Lady Margaret Road, High Street and South Road amongst other retail premises in Southall. The road and footway outside the premises generally run east to west, vehicular and foot traffic can travel in either direction. The Broadway is part of the A4020 an arterial route in West London. The street is a popular destination for both locals and visitors as it has a wide variety of South Asian shops and restaurants. There are no other adult gaming centres nearby in the observation area, however Merkur Slots do have another premises at 37 - 39 King Street Southall UB2 4DQ which operates 24-hrs a day 7-days a week.
21. The boundaries of observations focused on The Broadway to Lancaster Road in the west, The Broadway to Lady Margaret Road junction with Shackleton Road in the north, The Broadway to South Road junction with Park Road in the south and The Broadway to High Street junction with Avenue Road in the east.
22. West of and immediately adjacent to Merkur Slots is Euro Money Exchange & Travel 14 The Broadway UB1 1PS. East of and immediately adjacent to Merkur Slots is 10 The Broadway UB1 1PS which is an empty shop premises advertised for let.
23. The other gambling premises in the observation area included:

- Paddy Power Bookmakers 17 South Road Southall UB1 1SU - advertised as opening 7-days a week Monday to Sunday 08:00hrs – 22:00hrs.
 - Coral Bookmakers 17 South Road Southall UB1 1SU - advertised as opening 7-days a week Monday to Sunday 08:00hrs – 22:00hrs.
 - Betfred Bookmakers 34 - 36 High Street Southall UB1 3DA - advertised as opening 7-days a week Monday to Saturday 08:00hrs – 22:00hrs and Sunday 09:00hrs – 22:00hrs.
 - Betfred Bookmakers 134 The Broadway Southall UB1 1QN - advertised as opening 7-days a week Monday to Saturday 08:00hrs – 22:00hrs and Sunday 09:00hrs – 22:00hrs.
 - Paddy Power Bookmakers 128 The Broadway Southall UB1 1QF- advertised as opening 7-days a week Monday to Saturday 08:00hrs – 20:00hrs and Sunday 09:00hrs – 22:00hrs.
24. The Merkur Slots and other gambling premises in the area can be divided into two main types:
- Betting premises not licensed to serve alcohol.
 - Gaming premises – Adult Gaming Centres (AGC) and Bingo premises not licensed to serve alcohol.
25. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
26. There were two places of worship in the observation area:
- Abubakr Masjid Mosque 165-169 The Broadway Southall UB1 1LR.
 - Vishma Hindu Mandir Hindu Temple 2 Lady Margaret Road Southall UB1 2RA.
27. The 24-hr Southall London Fire Brigade Station is close by at 17 - 19 High Street Southall UB1 3HA.
28. The area is well served by public transport with a variety of bus routes and an abundance of taxis. There was restricted car parking available in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
29. In the observations area there were no public houses, nightclubs or late licensed bars however there was a McDonalds Restaurant and other fast-food outlets which were open until the early hours of the morning. There were two large

supermarkets in South Road, Quality Foods Supermarket and Iceland Supermarket 47 - 61 South Road.

30. The area felt safe with members of the public going about their business, working, shopping and socialising.
31. Observations concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment. Photographic images of what was seen during the observations were taken to support findings and are documented in Appendix A.

Covert Observations

32. Observations commenced at 21:55hrs on Thursday 17th April and concluded at 06:10hrs on Friday 18th April 2025, the weather overnight was dry and mild. Initial observations monitored the Merkur premises and the immediate area around it - Image A1.
33. The Merkur Slots premises had a smart corporate and professional looking frontage that was well maintained and clean. A sign located close to the front door advertised the premises 24-hour opening.
34. The entrance door of the premises was closed. There were no queues of people waiting to enter and the area was very quiet.
35. On the main external entry doors for customers to read were signs informing those that entered the following:
 - No persons under the age of 18 to enter.
 - CCTV in operation.
 - No consumption of alcohol on premises.
 - No smoking on premises.
36. At 22:00hrs the bookmakers had closed as had most other retail premises. This left the restaurants, fast-food takeaways, Merkur Slots, late opening supermarkets and temporary food stalls open. At this time all the premises were well run and had no issues. The main means of transport in the area was buses, taxis and private cars.
37. Between 22:00hrs and 22:59hrs there was regular pedestrian traffic passing the venue and The Broadway was busy with continuous vehicular traffic. The restaurants, fast-food outlets and temporary food stalls were busy. Many of the people enjoying the eateries were family groups. Underneath the covered area at the front of Quality Foods in South Road there were several apparently homeless people sleeping rough. This was well away from Merkur Slots and

5

these people didn't migrate to the premises – Images A2, A3, A4, A5, A6, A7, A8, A9, A10, A11, A12, A13, A14, A15, A16, A17, A18, A19, A20, A21.

38. Between 23:00hrs and 00:01hrs the restaurants and some popup food stalls closed. Pedestrian traffic reduced as did the vehicular traffic but to a lesser degree – Images A22, A23.
39. Between 00:10hrs and 00:59hrs most of the food premises and temporary stalls had closed. These premises were to the west of Merkur Slots towards Lancaster Road and some distance from the venue – Images A24, A25, A26.
40. At 01:00hrs McDonalds 170 The Broadway UB1 1NN closed without incident.
41. Between 01:00hrs and 02:00hrs the closed premises were being cleaned and remaining premises started to close like Karak Chaii 95 The Broadway UB1 1LN which closed at 02:00hrs. During this time rubbish collecting took place – Images A27, A28, A29, A30.
42. Merkur Slots remained quiet with little or no foot traffic. No one was seen loitering around the premises and it was clear of rubbish – Images A31, A32.
43. Between 02:15hrs and 03:18hrs the area remained quiet with little or no foot traffic and occasionally a vehicle would pass the venue – Image A33.
44. Between 03:19hrs and 04:02hrs I conducted a covert visit to the Merkur Slots 12 The Broadway Southall UB1 1PS.
45. At 03:19hrs I went to the entrance door which was closed. The door was locked and the night bell was missing so I knocked on the door. The door had two-way glass at the top and bottom to allow staff to vet customers before opening the door or CCTV could be used from inside the premises – Image A34.
46. After a short time, the door was opened by a badged SIA male door supervisor. I asked if I could come into the premises. The door supervisor asked me if I was banned from Merkur Slots and I stated I wasn't. He then asked for my name, and I asked why he needed it. He stated he required my name so that he could check I wasn't banned from the premises. I provided him my name and I was allowed to enter. I was not asked for my name or challenged again whilst I was in the venue. The door supervisor was smartly dressed wearing a corporate jacket with Carter Security embroidered on it which I assumed was the name of security company he was worked for.
47. As I entered the premises there were notice boards to my left and right where notices displaying Merkur Slots policies and licences were available for customers to see and read.
48. On entry I saw the door supervisor speaking to a male member of staff who was smartly dressed in Merkur Slots corporate clothing. This member of staff was

- standing by the reception desk which was located towards the front of the premises on the right-hand side. I was welcomed to the premises by the staff.
49. The reception desk area was primarily a workstation for staff to run the premises from and was not a bar. Its secondary function was for the preparation of hot and soft drinks for customers and it was clean and tidy.
 50. As I walked through the premises looking for a machine, I saw throughout the venue that the floor was carpeted and there were a variety of gaming machines available for customers use from the front to the back of the premises. The venue and machines were clean, tidy and regularly maintained throughout. There was a toilet at the back left-hand side and a private office at the back of the premises as well.
 51. There were five customers already in the premises quietly playing the machines – three males and two females. The customers were aged between 35 – 55 years old and casually dressed. During the visit all the customers remained in the venue. None of the customers appeared to know each other and they weren't vulnerable or intoxicated.
 52. I found a machine and began to play it. After a few minutes I was offered a hot drink or soft drink by staff. I accepted the offer of a coffee which was brought to me a short time later.
 53. Whilst inside the premises I felt safe, the staff were friendly, polite and informative. I was not pressurised or encouraged to spend money. I was aware of the door supervisor and other staff completing low-profile patrols checking on customers' needs and making sure they weren't vulnerable. I observed the staff cleaning the reception area.
 54. During my visit I asked to use the toilet facilities and was directed to them at the rear of the premises. On entering I found it to be clean and tidy. On the wall I saw a toilet inspection sheet that showed the toilets were checked on an hourly basis. Gambling safeguarding literature and GamCare leaflets were displayed on the wall – Images A35, A36.
 55. Whilst in the premises I saw the staff cleaning the toilet and other surfaces around the premises.
 56. Once I had used the toilet, I left the premises at 04:02hrs, as I went out through the entrance door there was no one loitering outside or looking to gain entry. There was no anti-social behaviour inside, or in the vicinity of the premises – Image A37.
 57. From 04:05hrs to 05:00hrs The Broadway and surrounding footpaths were very quiet with little or no pedestrians. If there were any they would be on their own and just transiting the area. The roads were quiet with one or two vehicles at a time passing through the area. The whole area continued to be very quiet with no

movement apart from delivery vehicles starting to deliver goods to food and retail premises – A38.

58. At 05:08hrs street cleaning vehicles were cleaning the roads and footpaths. At this time I began to see more people on foot making their way to or from work. People also started to congregate at the bus stops – Images A39, A40.
59. At 05:10hrs the roads were quiet but traffic was starting to increase Images – A41, A42, A43, A44.
60. At 05:19hrs the community were using the Abubakr Masjid Mosque 165 – 169 The Broadway which is opposite McDonalds which remained closed – Images A45, A46.
61. Between 05:20hrs and 06:10hrs vehicular and pedestrian traffic continued to increase with buses in regular use – Images A47, A48, A49, A50.
62. The Merkur Slots premises remained quiet and the observations were concluded at 06:10hrs – Image A51.

Summary

63. During this period of observation consideration was given to the local environment and the impact of an adult gaming centre in the area, there were no concerns.
64. There was no evidence of criminality, anti-social behaviour and additional noise linked to the Merkur Slots premises or any other premises at this location. The customers seen were not young people and there was no evidence of any drunk or other vulnerable people.
65. The Merkur Slots premises demographic is much older and doesn't attract young people or vulnerable persons. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with generally no more than a handful of mature customers in at any one time, the atmosphere was relaxed and welcoming. None of the customers were pressurised or encouraged to spend money.
66. The covert visit found the staff to be professional and attentive. The premises appeared to be well run and there are clearly defined systems in place to support the Gambling Act objectives.
67. During the course of these observations it is clear the presence of the Merkur Slots 24-hour adult gaming centre does not and would not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to.

68. Merkur Slots UK Limited takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- Challenge 25 Policy – Strict Over 18 Policy. The venue operates a Challenge 25 Policy whereby photographic ID is required to gain entry.
 - In View Tools – Staying in control is a key part of messaging in the Merkur Slots venues. Leafleting and posters such as GamCam can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
69. As a company Leveche Associates Limited have found that there is a perception that Adult Gaming Centres bring anti-social behaviour and criminality. This was not reflected in these observations.
70. Merkur Slots premises are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. Effective regulation and oversight of the premises ensures potentially negative behaviour is prevented and ensures responsible gaming practices. From observations, it is clear that the Merkur Slots premises does not have a negative impact on the environment, infrastructure or local community.
71. The facts in this report are honest and true. The opinions expressed are made in good faith and with best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
23rd April 2025



Appendix A

Observation Images
17th – 18th April 2025

Merkur Slots

12 The Broadway
Southall
UB1 1PS

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A1

21:56hrs

Merkur Slots
12 The Broadway Southall UB1 1PS



Image A2

21:57hrs

The Broadway looking east towards j/w
Lady Margaret Road, High Street & South Road

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A3

21:59hrs

The Broadway looking west towards Merkur Slots

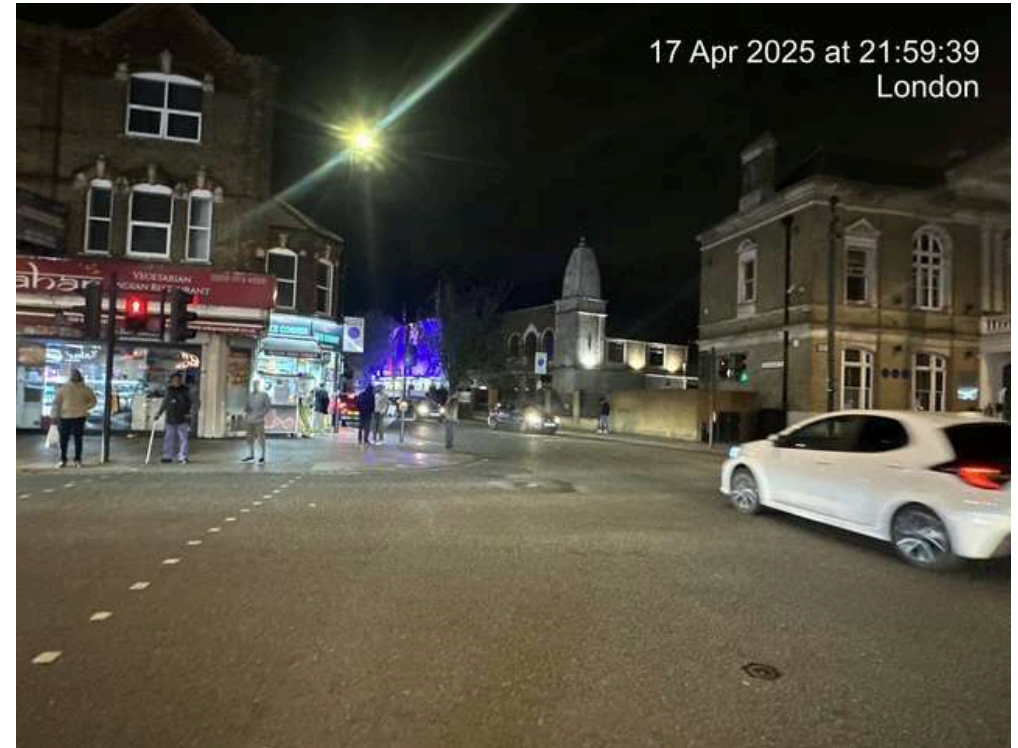


Image A4

21:59hrs

The Broadway looking north
towards j/w Lady Margaret Road

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A5

21:59hrs

The Broadway looking east towards j/w High Street



Image A6

21:59hrs

The Broadway looking south towards j/w South Road

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A7

22:01hrs

Vishma Hindu Mandir - Hindu Temple
2 Lady Margaret Road Southall UB1 2RA



Image A8

22:05hrs

Betfred Bookmakers
34 - 36 High Street Southall UB1 3DA

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025

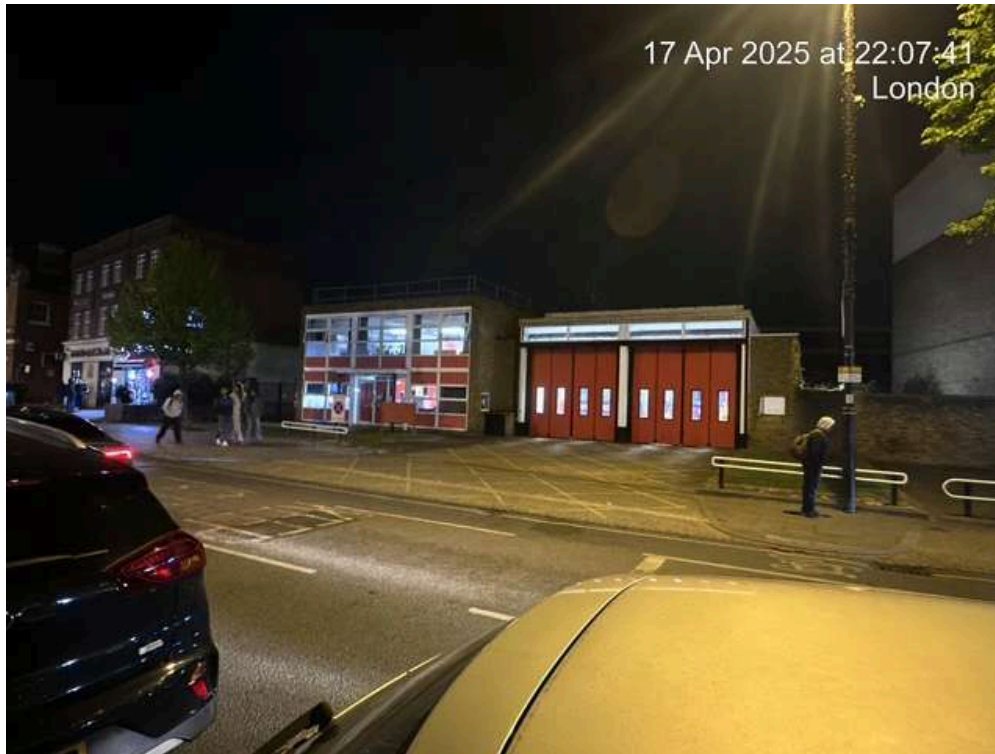


Image A9

22:07hrs

Southall Fire Station
17-19 High Street Southall UB1 3HA



Image A10

22:11hrs

Paddy Power Bookmakers
17 South Road Southall UB1 1SU

Appendix A

12 The Broadway, Southall, UB1 1PS

17th - 18th April 2025

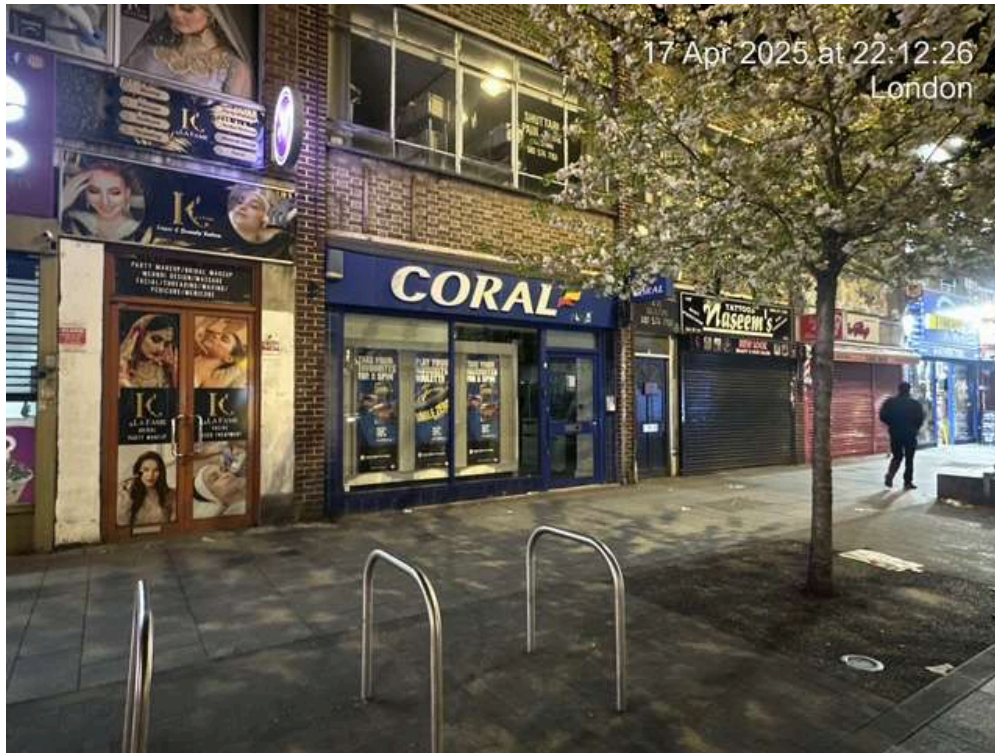


Image A11

22:12hrs

Coral Bookmakers
17 South Road Southall UB1 1SU



Image A12

22:15hrs

Iceland Supermarket
47-61 South Road Southall UB1 1SQ

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A13

22:15hrs

Quality Foods
47-61 South Road Southall UB1 1SQ



Image A14

22:21hrs

The Broadway looking west towards McDonalds

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A15

22:26hrs

Paddy Power Bookmakers
128 The Broadway Southall UB1 1QF



Image A16

22:48hrs

Betfred Bookmakers
134 The Broadway Southall UB1 1QN

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A17

22:52hrs

Kebabish next to Southall Shopping Centre
44 The Broadway Southall UB1 1QB



Image A18

22:58hrs

Southall Town Hall
1 High Street Southall UB1 3HA

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A19

22:58hrs

South Road j/w The Broadway
High Street & Lady Margaret Road looking north



Image A20

22:59hrs

South Road looking south

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A21

22:59hrs

The Broadway looking east towards High Street



Image A22

23:00hrs

Merkur Slots
12 The Broadway Southall UB1 1PS

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A23

23:00hrs

The Broadway looking west



Image A24

00:12hrs

Merkur Slots
12 The Broadway Southall UB1 1PS

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A25

00:13hrs

The Broadway looking west towards Merkur Slots



Image A26

00:13hrs

The Broadway looking north
towards Lady Margaret Road

Appendix A

12 The Broadway, Southall, UB1 1PS

17th - 18th April 2025



Image A27

01:23hrs

The Broadway looking west



Image A28

01:30hrs

Karak Chai
95 The Broadway Southall UB1 1LN

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A29

01:30hrs

Rubbish collection in The Broadway Southall



Image A30

01:35hrs

McDonalds
170 The Broadway Southall UB1 1NN

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A31

01:14hrs

Merkur Slots
12 The Broadway Southall UB1 1PS

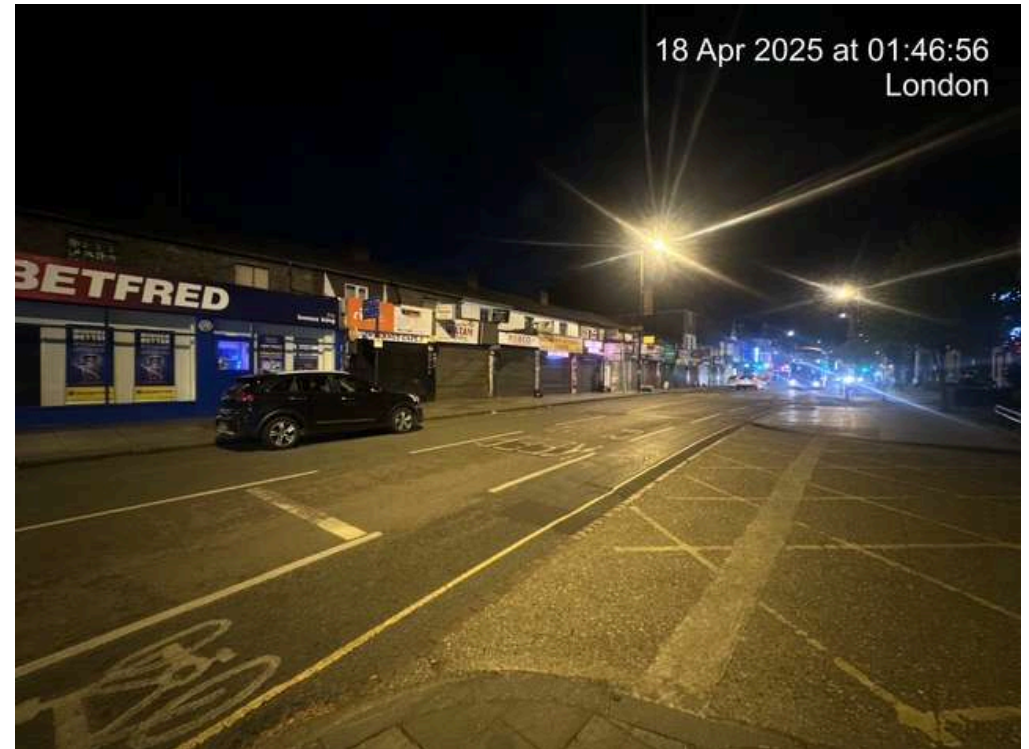


Image A32

01:46hrs

High Street looking west towards Merkur Slots

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A33

03:18hrs

The Broadway looking west



Image A34

03:19hrs

Merkur Slots
12 The Broadway Southall UB1 1PS

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A35

03:40hrs

Gamcare Literature in
Toilets Merkur Slots Southall

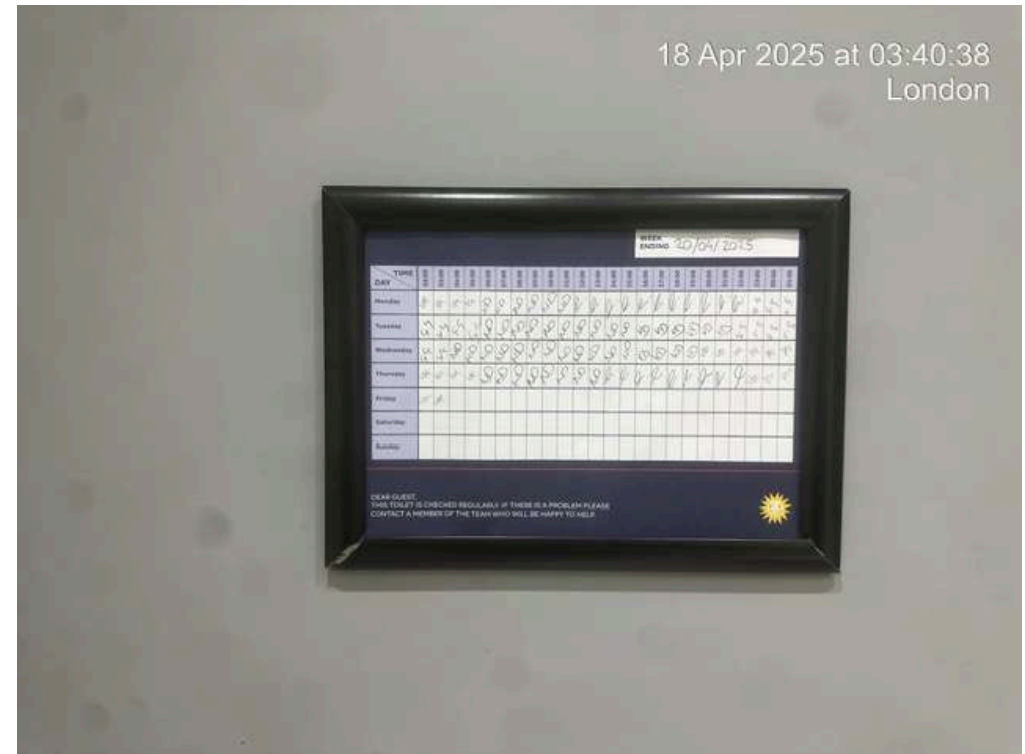


Image A36

03:40hrs

Toilet Check List - Merkur Slots Southall

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025

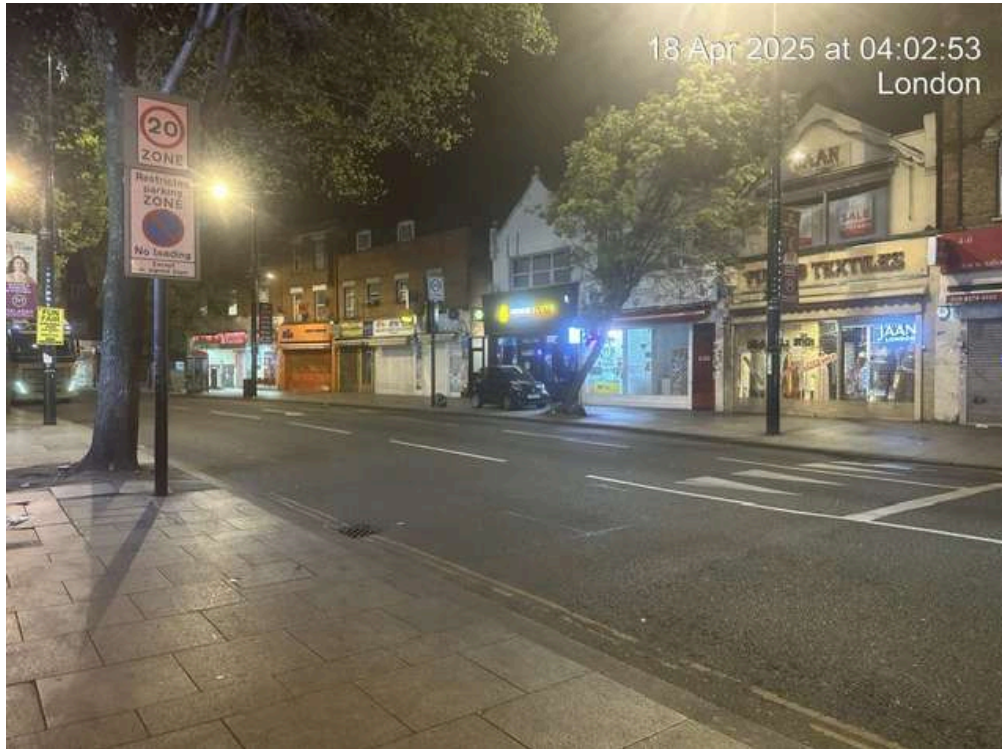


Image A37

04:02hrs

Merkur Slots
12 The Broadway Southall UB1 1PS



Image A38

04:03hrs

The Broadway j/w Lady Margaret Road
High Street & South Road looking east

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A39

05:08hrs

Street Cleaning
The Broadway looking west



Image A40

05:08hrs

The Broadway looking east

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A41

05:09hrs

Merkur Slots
12 The Broadway Southall UB1 1PS



Image A42

05:10hrs

The Broadway looking north
towards Lady Margaret Road

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A43

05:10hrs

South Road looking south



Image A44

05:10hrs

High Street looking east

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025

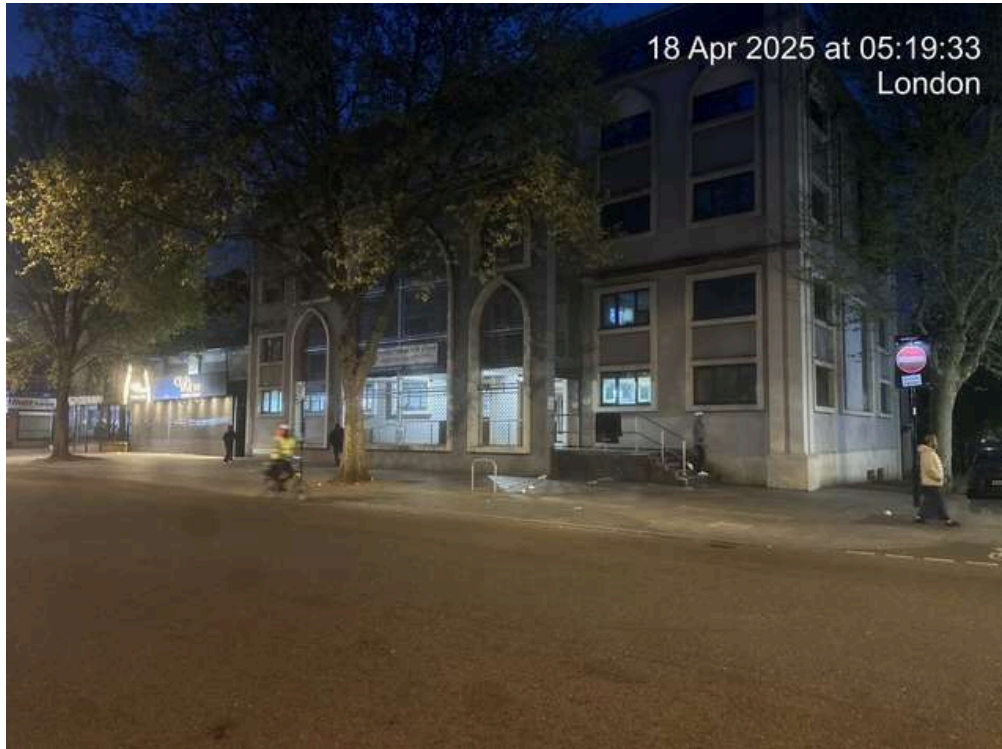


Image A45

05:19hrs

Abubakr Masjid Mosque
165-169 The Broadway Southall UB1 1LR



Image A46

05:19hrs

McDonalds
170 The Broadway Southall UB1 1NN

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025

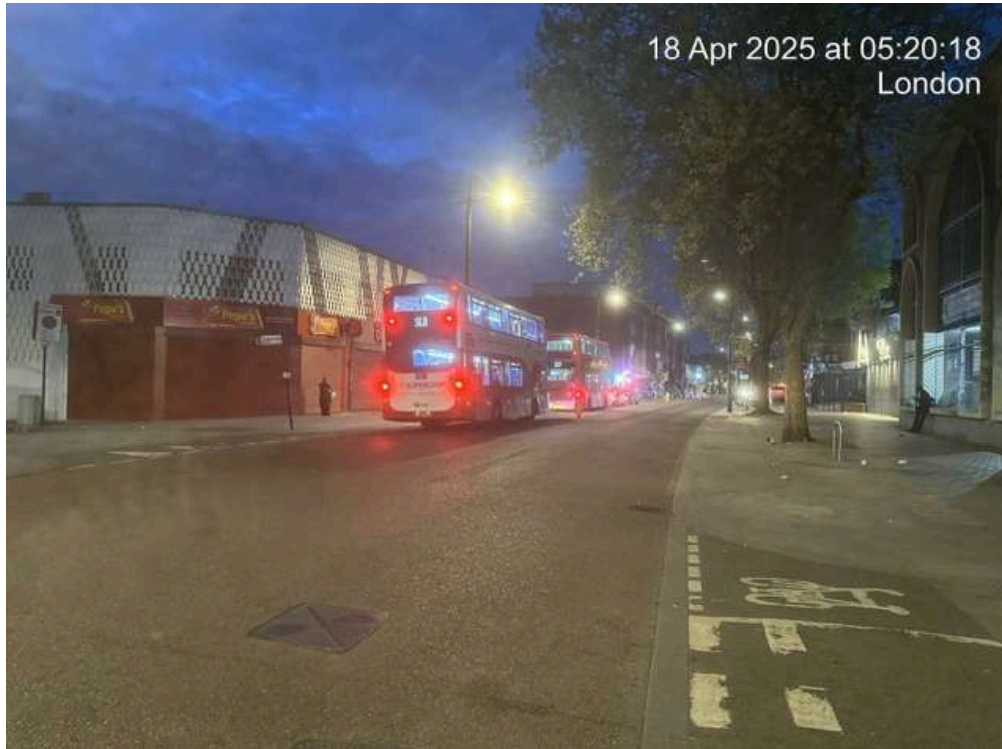


Image A47

05:20hrs

The Broadway near j/w
Lancaster Road looking east



Image A48

06:09hrs

Merkur Slots
12 The Broadway Southall UB1 1PS

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A49

06:09hrs

The Broadway looking east



Image A50

06:10hrs

The Broadway looking west

Appendix A

12 The Broadway, Southall, UB1 1PS
17th - 18th April 2025



Image A51

06:10hrs

The Broadway looking east towards Merkur Slots

Extract of Licence Conditions and Codes of Practice (LCCP) for Bingo

Version effective from 7 August 2025

1.1.1 - Qualified persons – qualifying position

Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators.

1. In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006¹.
2. Schedule X² lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act³ for amendment of the details of the licence set out in Schedule X.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

¹ [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006\(opens in new tab\)](#)

² The schedules mentioned here will be attached to individual licences.

³ [Section 104\(1\)\(b\) of the Act \(opens in new tab\)](#)

1.2.1 - Specified management offices – personal management licences

Applies to:

All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences.

1. Subject to 6 and 7 below, licensees must ensure:
 - a. that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter 'a personal management licence'); and
 - b. that at least one person occupies at least one of those offices
2. The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
 - a. the overall management and direction of the licensee's business or affairs (this is likely to be the Chief Executive Officer, Managing Director or equivalent
 - b. chairing the board (where the licensee has such a body) where that appointment is held for a fixed or indeterminate term of office, unless:
 1. the position is held only on a transient and short-term basis for individual meetings; and
 2. the licensee retains evidence in support of point 1.
 - c. the licensee's finance function as head of that function
 - d. the licensee's gambling regulatory compliance function as head of that function
 - e. the licensee's marketing function as head of that function
 - f. the licensee's information technology function as head of that function in so far as it relates to gambling-related information technology and software
 - g. oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act¹ or across an identified geographical area
 - h. in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act, and
 - i. the licensee's anti-money laundering and counter-terrorist financing function as head of that function this is likely to include the following:
 - a. for holders of casino licences, the person responsible for compliance with the relevant regulations (and appointed in accordance with those regulations); and the person responsible for submission of reports of known or suspected money laundering or terrorist financing activity under the relevant legislation (and appointed in accordance with the relevant regulations);
 - b. for holders of licences other than casino licences, where an individual has been appointed to submit reports of known or suspected money laundering or terrorist financing activity under the relevant legislation, that individual.
3. The person responsible for the licensee's gambling regulatory compliance function as head of that function shall not, except with the Commission's express approval, occupy any other specified management office.
4. Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder's personal management licence.
5. Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act², the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual's work and any requirements of the Commission in respect of such matters applicable during the period of the review.
6. Paragraphs 1 to 5 above shall not apply to a licensee for so long as the licensee is a 'small-scale operator' as defined in the Gambling Act 2005 (Definition of Small-scale Operator)

Regulations 2006³ ('the Regulations').

7. During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs 1 to 6 above shall apply subject to the proviso that the phrase 'each individual' in paragraph 1a shall not include any individual who was a 'qualified person' (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

¹ [Part 8 of the Act \(opens in new tab\)](#)

² [Section 116\(2\) of the Act \(opens in new tab\)](#)

³ [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006 \(opens in new tab\)](#)

2.1.1 - Access to (and provision of data from) key equipment

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences.

1. Licensees must, on request, permit an enforcement officer to inspect any of their remote gambling equipment and/or provide to the Commission copies of data held on such equipment in such format and manner as the Commission may request.

2.2.1 - Gambling software

Applies to:

All remote casino, bingo and betting licences other than ancillary licences and remote betting intermediary (trading room only) licences.

1. All gambling software¹ used by the licensee must have been manufactured by the holder of a gambling software operating licence. All such gambling software must also be supplied to the licensee by a holder of a gambling software operating licence. Such software must only be installed or adapted by the holder of such a licence.

¹ As defined in [section 41\(2\)&\(3\) of the Act Part 8 of the Act \(opens in new tab\)](#).

2.3.1 - Technical standards

Applies to:

All non-remote gaming machine technical and gambling software licences and remote operating licences, including remote gaming machine technical, remote gambling software and betting ancillary remote licences, but not remote betting intermediary (trading rooms only) licences.

1. Licensees must comply with the Commission's technical standards¹ and with requirements set by the Commission relating to the timing and procedures for testing.

¹ [The Commission's technical standards \(opens in new tab\)](#)

2.3.2 - Bingo equipment specifications

Applies to:

Non-remote bingo operating licences and bingo ancillary remote licences.

1. Licensees must comply with the Commission's specification for bingo equipment¹.

¹ [Bingo technical requirements \(opens in new tab\)](#)

3.1.2 - Other networks

Applies to:

All remote casino, bingo, and betting licences (except ancillary remote and host licences).

1. Subject to 2 below, all licensees who provide facilities for gambling, other than peer to peer gaming, in circumstances in which they do not contract directly with all of the participants using those facilities ('network operators') must have, put into effect and monitor the effectiveness of policies and procedures designed to ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the network operator, or that player and another holder of a Gambling Commission remote operating licence of the same kind as that held by the network operator ('a relevant licence');
 - b. the arrangements between the network operator and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the network operator's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act¹,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (for example, the National Bingo Game).

¹ [Proceeds of Crime Act \(opens in new tab\)](#)

3.1.3 - Hosting

Applies to:

All casino (game host), bingo (game host), general betting (host) (real events) and general betting (host) (virtual events) licences.

1. Subject to 2 below, all licensees who provide facilities for gambling in circumstances in which they do not contract directly with any of the participants using those facilities ('hosts') must ensure that:
 - a. every participant using the facilities in Great Britain ('a domestic customer') is doing so pursuant to a contract entered into between that player and the holder of a Gambling Commission remote casino, bingo, general betting (real events) or general betting (virtual events) operating licence ('a relevant licence');
 - b. the arrangements between the host and any holder of a relevant licence through which domestic customers access their facilities, and with gambling operators not licensed by the Gambling Commission through which customers use their facilities outside Great Britain, provide in clear terms which operator is to be responsible for the handling of which categories of customer complaint and dispute; in particular such arrangements must provide how a dispute involving customers from more than one jurisdiction is to be handled;
 - c. the host's arrangements for the sharing of information both with any holder of a relevant licence and with gambling operators not licensed by the Gambling Commission through which participants use the facilities outside Great Britain are such as to enable all parties to discharge effectively their respective regulatory obligations, in particular in relation to:
 - i. prevention of money laundering; combating the financing of terrorism; and where applicable, the Proceeds of Crime Act¹,
 - ii. investigation of suspected cheating,
 - iii. combating of problem gambling, and
 - iv. investigation of customer complaints.
2. Paragraph 1 above does not apply to the provision to the holder of a non-remote bingo operating licence (H) of facilities for the playing of games of bingo organised by H in premises in respect of which a bingo premises licence has effect (for example, the National Bingo Game).

¹ [Proceeds of Crime Act \(opens in new tab\)](#)

4.1.1 - Segregation of funds

Applies to:

All remote operating licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences.

1. Licensees who hold customer funds must ensure that these are held in a separate client bank account or accounts.
2. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling,
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer, and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

4.2.1 - Disclosure to customers

Applies to:

All operating licences, except gaming machine technical, gambling software, host, ancillary, remote bingo, and ancillary remote casino licences.

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and
 - c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

5.1.1 - Cash and cash equivalents

Applies to:

All operating licences except gaming machine technical, gambling software and host licences.

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (for example, bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such 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 guidelines published by the Gambling Commission from time to time.

5.1.2 - Payment methods and services

Applies to:

All remote casino, bingo and betting operating licences, except ancillary, host and remote betting intermediary (trading room only) licences.

Effective from 31 January 2024:

1. Licensees must only accept payment from customers using their gambling facilities in Great Britain by a method which involves the provision of payment services as defined in Schedule 1 Part 1 of the Payment Services Regulations 2017 (SI 2017 No 752)¹ if the provider of those services is a 'payment service provider' within the definition of that term in regulation 2 of those Regulations² (or the equivalent requirements of any UK Statutory Instrument by which those regulations are amended or superseded).

¹ [Schedule 1 Part 1 of the Payment Services Regulations 2017 \(SI 2017 No 752\)](#) (opens in new tab).

² [Regulation 2 of the Payment Services Regulations 2017 \(SI 2017 No 752\)](#) (opens in new tab).

6.1.2 - Use of credit cards

Applies to:

All non-remote general betting, pool betting and betting intermediary licences, and all remote licences (including ancillary remote betting and ancillary remote lottery licences) except gaming machine technical, gambling software and host licences.

1. Licensees must not accept payment for gambling by credit card. This includes payments to the licensee made by credit card through a money service business.

7.1.1 - Fair and transparent terms and practices

Applies to:

All operating licences except gaming machine technical and gambling software licences.

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015¹. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Consumer Protection from Unfair Trading Regulations 2008², at any stage of their interactions with consumers.

¹ [Consumer Rights Act 2015 \(opens in new tab\)](#)

² [Consumer Protection from Unfair Trading Regulations 2008 \(opens in new tab\)](#)

8.1.1 - Display of licensed status

Applies to:

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only), remote general betting (limited) and remote general betting (standard) (remote platform) licences.

[Read additional guidance on the technical requirements](#) contained within this section.

1. Licensees providing facilities for remote gambling must display on every screen from which customers are able to access gambling facilities provided in reliance on this licence:
 - a. a statement that they are licensed and regulated by the Gambling Commission;
 - b. their account number; and
 - c. a link (which will be supplied by the Commission) to their current licensed status as recorded on the Commission's website.
2. Such statement, account number and link must be in the format, provided by the means, and contain the information from time to time specified by the Commission in its technical standards applicable to the kind of facilities for gambling provided in accordance with this licence or otherwise notified to licensees for the purposes of this condition.
3. Licensees may also display on screens accessible from Great Britain information about licences or other permissions they hold from regulators in, or by virtue of the laws of, jurisdictions outside Great Britain provided it is made plain on those screens that the licensee provides facilities for gambling to persons in Great Britain in reliance on their Gambling Commission licence(s).

9.1.2 - Prohibited bingo prize games

Applies to:

All non-remote bingo operating licences.

1. Licensees must not offer or permit to be played prize gaming games that appear on any list of games prohibited by the Commission.

12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

Applies to:

All operating licences except gaming machine technical and gambling software licences.

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission¹ from time to time.

¹ [Guidelines on the prevention of money laundering and combating the financing of terrorism \(opens in new tab\)](#)

14.1.1 - Access to premises

Applies to:

All operating licences.

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act¹.

¹ [Part 15 of the Gambling Act 2005 \(opens in new tab\)](#)

15.1.1 - Reporting suspicion of offences etc – non-betting licences

Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences.

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.¹

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our [‘eServices’](#) digital service on our website

15.1.3 - Reporting of systematic or organised money lending

Applies to:

All non-remote casino, non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences.

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our [‘eServices’](#) digital service on our website

15.2.1 - Reporting key events

Applies to:

All operating licences.

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 3% or more of the issued share capital of the licensee or its holding company):
 - presenting of a petition for winding up
 - making of a winding up order
 - entering into administration or receivership
 - bankruptcy (applying to individuals only)
 - sequestration (applicable in Scotland), or
 - an individual voluntary arrangement.

Relevant persons and positions

2. In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006²
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.

7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002³ or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000⁴ (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency⁵ in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through

which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006⁶ or any statutory modification or re-enactment thereof

- a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006⁷ or any statutory modification or re-enactment thereof
- b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional [guidance on the information requirements](#) contained within this section.

¹ Key events are to be reported to us online via the '[eServices](#)' ([opens in new tab](#)) digital service on our website.

² [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006](#) ([opens in new tab](#)).

³ [Proceeds of Crime Act 2002](#) ([opens in new tab](#)).

⁴ [Terrorism Act 2000](#) ([opens in new tab](#)).

⁵ [United Kingdom Financial Intelligence Unit of the National Crime Agency](#) ([opens in new tab](#)).

⁶ [Section 1173 of the Companies Act 2006](#) ([opens in new tab](#)).

⁷ [Section 1159 of the Companies Act 2006](#) ([opens in new tab](#)).

15.2.2 - Other reportable events

Applies to:

All operating licences.

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002², or Part III of the Terrorism Act 2000³, or any UK law by which those statutes are amended or superseded.
2. The licensee must notify the Commission, as soon as reasonably practicable, if it knows or has reasonable cause to suspect that a person who has gambled with it has died by suicide, whether or not such suicide is known or suspected to be associated with gambling. Such notification must include the person's name and date of birth, and a summary of their gambling activity, if that information is available to the licensee.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and
- b. without prejudice to section 327 of the Gambling Act 2005⁴, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional [guidance on the information requirements](#) contained within this section.

¹ Key events are to be reported to us online via the '[eServices](#)' ([opens in new tab](#)) digital service on our website.

² [Proceeds of Crime Act 2002](#) ([opens in new tab](#)).

³ [Part III of the Terrorism Act 2000](#) ([opens in new tab](#)).

⁴ [Section 327 of the Gambling Act 2005](#) ([opens in new tab](#)).

15.3.1 - General and regulatory returns

Applies to:

All operating licences.

On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.

In particular within 28 days of the end of each quarterly period licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.

¹Regulatory returns are to be submitted to us online via the ['eServices'](#) digital service on our website.

16.1.1 - Responsible placement of digital adverts

Applies to:

All licences.

1 Licences must:

- a. Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b. take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c. ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

17.1.1 - Customer identity verification

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except any lottery licence the holder of which only provides facilities for participation in low frequency ¹ or subscription lotteries, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo.

1. Licensees must obtain and verify information in order to establish the identity of a customer before that customer is permitted to gamble. Information must include, but is not restricted to, the customer's name, address and date of birth.
2. A request made by a customer to withdraw funds from their account must not result in a requirement for additional information to be supplied as a condition of withdrawal if the licensee could have reasonably requested that information earlier. This requirement does not prevent a licensee from seeking information on the customer which they must obtain at that time due to any other legal obligation.
3. Before permitting a customer to deposit funds, licensees should inform customers what types of identity documents or other information the licensee may need the customer to provide, the circumstances in which such information might be required, and the form and manner in which such information should be provided.
4. Licensees must take reasonable steps to ensure that the information they hold on a customer's identity remains accurate.

¹ A 'low frequency lottery' is one of a series of separate lotteries promoted on behalf of the same non-commercial society or local authority, or as part of the same multiple society lottery scheme, in respect of which there is a period of at least two days between each lottery draw.

Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be 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 an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Social responsibility code

Compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution.

1.1.1 - Cooperation with the Commission

Ordinary code

Applies to:

All licences.

1. As made plain in its Statement of principles for licensing and regulation¹, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

¹ [Statement of principles for licensing and regulation \(opens in new tab\)](#)

1.1.2 - Responsibility for third parties – all licences

Social responsibility code

Applies to:

All licences.

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
 - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences.

1. Remote licensees must ensure in particular:
 - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems¹; and
 - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

¹ [Remote gambling and software technical standards \(opens in new tab\)](#)

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences.

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002¹ and the Terrorism Act 2000², licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators³ (excluding casino operators). *

¹ [Proceeds of Crime Act 2002 \(opens in new tab\)](#)

² [Terrorism Act 2000 \(opens in new tab\)](#)

³ [Proceeds of Crime Act 2002 – Advice for operators \(opens in new tab\)](#)

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences.

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
7. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 25 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our '[eServices](#)' digital service on our website.

3.2.11 - Remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
 - a. Verifying the age of a customer before the customer is able to:
 - i. deposit any funds into their account;
 - ii. access any free-to-play versions of gambling games that the licensee may make available; or
 - iii. gamble with the licensee using either their own money or any free bet or bonus.
 - b. warning potential customers that underage gambling is an offence;
 - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

3.2.12 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences.

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences.

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a. the information on how to gamble responsibly and access to help referred to above
 - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences.

1 Licensees must offer a 'time out' facility for customers for the following durations:

- a. 24 hours
- b. one week
- c. one month or
- d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:

- a. identifying customers who may be at risk of or experiencing harms associated with gambling.
- b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
- c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.

2. Licensees must take into account the Commission's guidance on customer interaction¹.

¹ [Customer interaction: formal guidance for premises-based operators \(opens in new tab\)](#)

3.4.3 - Remote customer interaction

Social responsibility code

Applies to:

All remote licences, except any remote lottery licence the holder of which does not provide facilities for participation in instant win or high frequency lotteries¹, remote gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote betting intermediary (trading rooms only) and remote general betting limited licences.

In force dates:

- in paragraph 1, the words ‘as explained in the Commission’s guidance (see paragraph 2)’; and the entirety of requirements 2 and 3 are in force from 31 October 2023
- paragraph 10 is in force from 12 February 2023
- the remainder of Social Responsibility (SR) Code Provision 3.4.3 is in force from 12 September 2022.

1. Licensees must implement effective customer interaction systems and processes in a way which minimises the risk of customers experiencing harms associated with gambling. These systems and processes must embed the three elements of customer interaction – identify, act and evaluate – and which reflect that customer interaction is an ongoing process as explained in the Commission’s guidance (see paragraph 2).
2. Licensees must take into account the Commission’s guidance on customer interaction for remote operators² as published and revised from time to time (‘the Guidance’).
3. Licensees must consider the factors that might make a customer more vulnerable to experiencing gambling harms and implement systems and processes to take appropriate and timely action where indicators of vulnerability³ are identified. Licensees must take account of the Commission’s approach to vulnerability as set out in the Commission’s Guidance.
4. Licensees must have in place effective systems and processes to monitor customer activity to identify harm or potential harm associated with gambling, from the point when an account is opened.
5. Licensees must use a range of indicators relevant to their customer and the nature of the gambling facilities provided in order to identify harm or potential harm associated with gambling. These must include:
 - a. customer spend
 - b. patterns of spend
 - c. time spent gambling
 - d. gambling behaviour indicators
 - e. customer-led contact
 - f. use of gambling management tools
 - g. account indicators.
6. In accordance with SR Code Provision 1.1.2, licensees are responsible for ensuring compliance with the requirements. In particular, if the licensee contracts with third party business-to-business providers to offer any aspect of the licensee’s business related to the licensed activities, the licensee is responsible for ensuring that systems and processes are in place to monitor the activity on the account for each of the indicators in paragraph 5 (a-g) and in a timely way as set out in paragraphs 7 and 8.
7. A licensee’s systems and processes for customer interaction must flag indicators of risk of harm in a timely manner for manual intervention, and feed into automated processes as required

by paragraph 11.

8. Licensees must take appropriate action in a timely manner when they have identified the risk of harm.
9. Licensees must tailor the type of action they take based on the number and level of indicators of harm exhibited. This must include, but not be limited to, systems and processes which deliver:
 - a. tailored action at lower levels of indicators of harm which seeks to minimise future harm
 - b. increasing action where earlier stages have not had the impact required
 - c. strong or stronger action as the immediate next step in cases where that is appropriate, rather than increasing action gradually
 - d. reducing or preventing marketing or the take-up of new bonus offers where appropriate
 - e. ending the business relationship where necessary.
10. Licensees must prevent marketing and the take up of new bonus offers where strong indicators of harm, as defined within the licensee's processes, have been identified.
11. Licensees must ensure that strong indicators of harm, as defined within the licensee's processes, are acted on in a timely manner by implementing automated processes. Where such automated processes are applied, the licensee must manually review their operation in each individual customer's case and the licensee must allow the customer the opportunity to contest any automated decision which affects them.
12. Licensees must implement processes to understand the impact of individual interactions and actions on a customer's behaviour, the continued risk of harm and therefore whether and, if so, what further action is needed.
13. Licensees must take all reasonable steps to evaluate the effectiveness of their overall approach, for example by trialling and measuring impact, and be able to demonstrate to the Commission the outcomes of their evaluation.
14. Licensees must take account of problem gambling rates for the relevant gambling activity as published by the Commission⁴, in order to check whether the number of customer interactions is, at a minimum, in line with this level. For the avoidance of doubt, this provision is not intended to mandate the outcome of those customer interactions.

¹ A high frequency lottery is a lottery in which any draw takes place less than one hour after a draw in a previous lottery promoted on behalf of the same non-commercial society or local authority or as part of the same multiple lottery scheme.

² [Customer interaction guidance for remote gambling licensees \(opens in new tab\)](#).

³ [The Commission's approach to vulnerability \(opens in new tab\)](#).

⁴ [Problem gambling rates for the relevant gambling activities \(opens in new tab\)](#).

3.4.4 - Financial vulnerability check

Social responsibility code

Applies to:

All remote licences, except any remote lottery licence the holder of which does not provide facilities for participation in instant win or high frequency lotteries¹, remote gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote betting intermediary (trading rooms only) and remote general betting limited licences.

In force dates:

- Social Responsibility (SR) Code 3.4.4 is in force from 30 August 2024
- paragraph 7 is in force between 30 August 2024 to 27 February 2025.

1. Licensees must undertake a financial vulnerability check for customers that meet the relevant threshold.
2. A financial vulnerability check must include at a minimum a customer-specific public record information check for significant indicators of potential financial vulnerability. The check must include whether the customer is subject to any of the following:
 - a. bankruptcy order, or equivalent, or
 - b. county court judgment (CCJ); an individual voluntary arrangement (IVA); high court judgment (HCJ); administration order (AO) or decree; Debt Relief Order (DRO); or equivalent.
3. Licensees must:
 - a. consider the financial vulnerability information they obtain, together with all of the other information they know about the customer and are permitted to use, in order to assess risk,
 - b. take proportionate action when risk is identified, and
 - c. record the rationale for the decision on proportionate action.
4. Licensees must have and put into effect policies and procedures on:
 - a. whether, when taking decisions on proportionate action, it is appropriate for such a decision to be taken manually, in a fully automated manner (offering the customer the opportunity for manual review where decisions for action are taken), or through a combination of automated processing and subsequent manual review, and
 - b. the circumstances in which immediate action is necessary to limit harm where significant risk is identified.
5. The licensee is not required to conduct this financial vulnerability check at the point when the customer reaches a relevant threshold, if the operator has previously conducted a financial vulnerability check or a financial risk assessment within the previous 12 months.
6. From 28 February 2025, the relevant threshold is where the customer's deposits minus withdrawals exceeds £150 in a rolling 30-day period.
7. Between 30 August 2024 and 27 February 2025, the relevant threshold is where the customer's deposits minus withdrawals exceeds £500 in a rolling 30-day period.

¹ A high frequency lottery is a lottery in which any draw takes place less than one hour after a draw in a previous lottery promoted on behalf of the same non-commercial society or local authority or as **216**

part of the same multiple lottery scheme.

3.4.6 - Financial risk assessments pilot

Social responsibility code

Applies to:

All remote bingo, casino and betting licences of fee categories J1, K1 and L1.

1. Subject to paragraph 2 below, in this provision:

- a. the pilot phase is the period from 30 August 2024 to 31 March 2025 inclusive;
- b. the pilot stages of the pilot phase are three stages which operate over such periods of the pilot phase as may be specified by the Commission from time to time;
- c. a threshold is a threshold which is specified by the Commission for the purposes of subparagraph h below from time to time;
- d. a customer's account is an inactive account for the purposes of a pilot stage if the customer did not use that account for gambling during the period of 12 months prior to the commencement of the relevant pilot stage;
- e. a customer's account is an active account for the purposes of a pilot stage if the customer used that account for gambling during the period of 12 months prior to the commencement of the relevant pilot stage;
- f. the stage one historical period is such period as the Commission may specify for the purposes of subparagraph h(i);
- g. the stage two historical period is such period as the Commission may specify for the purposes of subparagraph h(ii);
- h. a relevant customer is:
 - i. during the first pilot stage, a customer of the licensee who has an account which is inactive, and in relation to which during the stage one historical period the deposits into that account minus the withdrawals from that account exceeded either the relevant threshold during a calendar day or the relevant threshold over a 90-day period;
 - ii. during the second pilot stage, a customer of the licensee who has an account which is active, and in relation to which during the stage two historical period the deposits into that account minus the withdrawals from that account exceeded either the relevant threshold during a calendar day or the relevant threshold over a 90-day period;
 - iii. during the third pilot stage, a customer of the licensee who has an account which is active, and in relation to which:
 - the deposits into that account minus the withdrawals from that account exceed the relevant threshold over any 24-hour period; or
 - the deposits into that account minus the withdrawals from that account exceed the relevant threshold over any 90-day period;
- i. a credit reference agency is any one of the three credit reference agencies, Equifax, Experian and TransUnion;
- j. a financial risk assessment is an assessment provided by a credit reference agency of the financial risk in relation to a customer which takes into account information that the credit reference agency holds about the customer, including (where available) credit performance data and aggregated current account turnover data.

2. The Commission may:

- a. extend the pilot phase so that it concludes on a date no later than 30 April 2025, any such extension to be notified to licensees no later than 17 March 2025;
- b. for the purposes of paragraph 1b above, specify that pilot stages operate over different periods in respect of different licensees and/or categories of licensees;
- c. for the purposes of paragraph 1c above, specify different thresholds for different pilot stages and/or for different cases and/or categories of case;
- d. for the purposes of paragraph 1f above, specify different stage one historical periods in respect of different licensees and/or categories of licensees;

- e. for the purposes of paragraph 1g above, specify different stage two historical periods in respect of different licensees and/or categories of licensees; and
 - f. for the purposes of paragraph 1h above, specify the relevant calendar days and the relevant 90 day periods, and the Commission may specify different such days or periods in respect of different licensees or categories of licensees.
3. During the pilot phase, a licensee must request from a credit reference agency a financial risk assessment in respect of each relevant customer. The request must be made:
- a. during the first and second pilot stages, within 10 working days of the relevant pilot stage commencing; and
 - b. during the third pilot stage, within 24 hours of the time at which the customer first becomes a relevant customer.
4. In a case in which a licensee receives a financial risk assessment pursuant to a request made under paragraph 3 above, the licensee must:
- a. consider the financial risk assessment and any other relevant information that it holds about the relevant customer and:
 - i. assess whether the relevant customer is or was (as the case may be) at risk of harm associated with gambling, and
 - ii. determine what action, if any, the licensee would take or would have taken (as the case may be) under SR Code Provision 3.4.3 as a result of that assessment if paragraph 6 below did not apply;
 - b. record the assessment and the determination referred to in subparagraph a above, and the reasons for the determination; and
 - c. provide to the Commission such information in relation to the assessment and/or determination referred to in subparagraph a above, and/or information in relation to such assessments and determinations generally, at such time and in such form and manner as the Commission may specify from time to time.
5. During the pilot phase, a licensee must:
- a. determine the policies and procedures that it would be appropriate for the licensee to adopt in relation to the provision to and receipt from credit reference agencies of data about customers (including the receipt of financial risk assessments);
 - b. determine the policies and procedures that it would be appropriate for the licensee to adopt in relation to assessments of whether a customer is at risk of harm associated with gambling, and determinations of what action (if any) the licensee would take as a result of that assessment, if the licensee were required to obtain and consider a financial risk assessment for the purposes of SR Code Provision 3.4.3; and
 - c. report to the Commission its conclusions under subparagraphs a and b above, and its reasons for those conclusions, at such time and in such form and manner as the Commission may specify from time to time.

3.4.7 - Financial risk assessments pilot – analysis phase

Social responsibility code

Applies to:

All remote bingo, casino and betting licences which were within fee categories J1, K1 and L1 on 30 August 2024.

1. In this provision:

- a. the 'analysis phase' is the period from the date on which this provision takes effect until such date as the Commission may specify;
- b. a 'direction' is a direction given by the Commission to a licensee (or licensees) under paragraph 2 below;
- c. a 'modified financial risk assessment' is a financial risk assessment which does not take into account such information that the credit reference agency holds about the customer as may be specified in a direction and/or which takes into account information that the credit reference agency holds about the customer in such manner as may be specified in a direction;
- d. 'pilot information' comprises:
 - i. a financial risk assessment obtained by a licensee during the pilot phase,
 - ii. any information available to the licensee only because it was included in a financial risk assessment obtained during the pilot phase,
 - iii. a financial risk assessment and a modified financial risk assessment obtained by a licensee during the analysis phase, and
 - iv. any other information obtained or generated by, or otherwise available to, the licensee only because the licensee has complied with a direction;
- e. the definitions of terms provided for by SR Code Provision 3.4.6(1) and (2) apply.

2. For the purpose of enabling a licensee and/or the Commission and/or a credit reference agency to analyse or further analyse information obtained or produced during the pilot phase, during the analysis phase the Commission may from time to time give to the licensee (or to more than one licensee) a direction which requires the licensee (or licensees):

- a. to provide to one or more credit reference agencies such information as may be specified in the direction;
- b. to request from one or more credit reference agencies such information as may be specified in the direction;
- c. to carry out such analysis of information as may be specified in the direction; and/or
- d. to provide to the Commission such information as may be specified in the direction.

3. For the avoidance of doubt, the information which may be specified in a direction may include, but is not limited to:

- a. information about one or more specific customers; and/or
- b. a modified financial risk assessment.

4. The licensee to which a direction is given must comply with the direction in such manner and in such form as the Commission may specify in the direction.

5. For the purpose of enabling the licensee and/or the Commission to analyse information obtained or produced by the licensee during the pilot phase or the analysis phase, the licensee must retain all pilot information until 31 March 2026 or such other date as the Commission may specify.

6. Subject to paragraph 5 above, the licensee must use pilot information only during the analysis phase and only for the purposes of complying with a direction. The licensee must not use pilot

3.5.1 - Self exclusion – Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences.

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.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded

might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.3 - Self-exclusion – remote SR code

Social responsibility code

Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries.

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.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. a record of the card numbers to be excluded;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

3.5.4 - Self-exclusion – Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
 - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;
 - d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to

access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.

8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.5 - Remote multi-operator SR code

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting when relied upon to provide facilities for betting via a machine (commonly known as self-service betting terminals) on premises where a betting or track premises licence has effect, remote general betting (remote platform), remote betting intermediary (trading room only), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences.

1. Licensees must participate in the national multi-operator self-exclusion scheme.

3.5.6 - Multi-operator non-remote SR code

Social responsibility code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres.

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

3.5.7 - Multi-operator non-remote ordinary code

Ordinary code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres.

1. Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

3.6.2 - Bingo

Ordinary code

Applies to:

All non-remote bingo licences.

1. Licensees who employ children under (under-16-year-olds) and young persons (those aged 16 or 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for playing bingo;
 - b. for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine; and
 - c. to employ a child to perform any function on premises where, and at time when, facilities are being provided for playing bingo.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above
 - b. all staff, including those who are children and young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children are not employed to work on bingo licensed premises at any time when the premises are open for business
 - b. neither children nor young persons are in any event asked to work in areas where gaming machines are situated.

3.6.7 - Remote

Ordinary code

Applies to:

All remote licences, except remote lottery, remote pool betting, remote gaming machine technical, remote gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence to employ them to provide facilities for gambling.

3.8.2 - Money-lending – other than casinos

Ordinary code

Applies to:

All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences.

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9.1 - Identification of individual customers - remote

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006¹ or any statutory modification or re-enactment thereof.

¹ [Section 1159 of the Companies Act 2006 \(opens in new tab\)](#)

4.1.1 - Fair terms

Social responsibility code

Applies to:

All licences, except gaming machine technical and gambling software licences.

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

4.2.2 - Display of rules - bingo

Social responsibility code

Applies to:

All non-remote bingo licences.

1. In complying with any condition on a bingo premises licence or a 2005 Act large casino premises licence requiring the display of rules about gaming, licensees must ensure that the following are included:
 - a. rules about each variant of bingo made available; and
 - b. rules about any prize gaming made available.

4.2.3 - Display of rules – remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees must make the following available to customers:
 - a. a player's guide to each gambling opportunity (bet, game or lottery) made available by the operator; and
 - b. such additional information relating to the available gambling as the Commission shall from time to time publish to licensees: the current requirements are set out in the Commission's Remote gambling and software technical standards¹.

¹ [Remote gambling and software technical standards \(opens in new tab\)](#)

4.2.4 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Where practicable, the player's guide and additional information referred to in the social responsibility code 4.2.3 should be made available through the medium in which the remote gambling is to be conducted. Where that is not practicable, licensees should either:
 - a. send a copy of the guide and required additional information by post, fax or email; or
 - b. make these available to the customer in another medium to which he has access.

5.1.1 - Rewards and bonuses – SR code

Social responsibility code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences.

1. If a licensee makes available to any customer or potential customer any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be operated, in such a way that:
 - a. 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;
 - b. neither the receipt nor the value or amount of the benefit is:
 - i. dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or
 - ii. 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.
 - c. 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; and further that:
 - d. if the benefit comprises free or subsidised travel or accommodation which facilitates the customer's attendance at particular licensed premises the terms on which it is offered are not directly related to the level of the customer's prospective gambling.
2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives¹.

¹ [Guidance on high value customer incentives \(opens in new tab\)](#)

5.1.2 - Proportionate rewards

Ordinary code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences.

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

5.1.3 - Alcoholic drinks

Social responsibility code

Applies to:

All non-remote bingo and casino licences.

1. If licensees offer customers free or discounted alcoholic drinks for consumption on the premises they must do so on terms which do not in any way link the availability of such drinks to whether, or when, the customer begins, or continues, to gamble.
2. Licensees must not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

5.1.6 - Compliance with advertising codes

Social responsibility code

Applies to:

All licences, except lottery licences.

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP)¹ and the Broadcast Committee of Advertising Practice (BCAP)² as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (that is, those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

¹ [Committee of Advertising Practice \(opens in new tab\)](#)

² [Broadcast Committee of Advertising Practice \(opens in new tab\)](#)

5.1.8 - Compliance with industry advertising codes

Ordinary code

Applies to:

All licences.

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising¹.

¹ [Gambling Industry Code for Socially Responsible Advertising \(opens in new tab\)](#)

5.1.9 - Other marketing requirements

Social responsibility code

Applies to:

All licences.

1. Licensees must ensure that their marketing communications, advertisement, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008¹) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

¹ [Consumer Protection from Unfair Trading Regulations 2008 \(opens in new tab\)](#)

5.1.10 - Online marketing in proximity to information on responsible gambling

Ordinary code

Applies to:

All licences.

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

5.1.11 - Direct electronic marketing consent

Social responsibility code

Applies to:

All licences.

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

5.1.12 - Direct marketing preferences

Social responsibility code

Applies to:

All remote casino, bingo and betting licences other than ancillary, host, remote betting intermediary (trading room only) and remote general betting (limited) licences.

1. Licensees must provide customers with options to opt-in to direct marketing on a per product and per channel basis. The options must cover all products and channels provided by the licensee and be set to opt-out by default. These options must be offered as part of the registration process and be updateable should customers change their preference. This requirement applies to all new and existing customers.
2. Channel options must include phone call, email and text messages (SMS) as applicable.
3. Product options must include betting, casino, bingo, as applicable. Operators must make clear to customers which products they offer are covered under relevant categories.
4. Where an operator seeks an additional step for customers to confirm their chosen marketing preferences, the structure and wording of that step must be presented in a manner which only asks for confirmation to progress those choices with one click to proceed. There must be no encouragement or option to change selection; only the option to accept or decline their selection.
5. Customers must not receive direct marketing that contravenes their channel or product preferences.
6. Existing customers who have not already opted out of marketing must be asked at their first log-in after commencement of this provision to confirm their marketing preferences if they have not done so already. Existing preferences can be copied over providing they match the format of this requirement.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences.

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.
2. Licensees must 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.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must 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.
5. Licensees' complaints handling policies and procedures must 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.
6. Licensees must 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 Commission¹ from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015² and,
- b. whose name appears on the list of providers³ that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

Read additional [guidance on the information requirements](#) contained within this section.

¹ [Complaints and disputes: Guidance published by the Gambling Commission \(opens in new tab\)](#)

² [The Alternative Dispute Resolution for Consumer Disputes \(Competent Authorities and Information\) Regulations 2015 \(opens in new tab\)](#)

³ [List of approved Alternative Dispute Resolution providers \(opens in new tab\)](#)

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences.

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences.

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our '[eServices](#)' digital service on our website.

² Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9.1.2 - Bingo

Social responsibility code

Applies to:

All non-remote bingo operating licences.

1. Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
3. Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the [statement of licensing policy \(opens in new tab\)](#) under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Guidance to licensing authorities

The Gambling Commission's guidance for licensing authorities.

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Other provisions and legislation

4.7. Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's [Licence conditions and codes of practice \(LCCP\)](#) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.

4.8. Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the [Environmental Protection Act 1990](#) ([opens in new tab](#)).

3 Licensing authority decisions

4.9. S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:

- a. in accordance with any relevant code of practice under s.24
- b. in accordance with any relevant guidance issued by the Commission under s.25
- c. reasonably consistent with the licensing objectives (subject to a and b above),
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

4.10. Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the guidance contained in this document, any relevant Commission code of practice, the licensing objectives or the licensing authority's own policy statement.

Delegations

4.11. The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.

4.12. It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise

to a risk of judicial review challenge, particularly on the basis of appearance of bias.

4.13. The tables at [Appendix G](#) set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

1 Licensing objectives

5.1. In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:

- 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.

5.2. It is expected that the licensing authority will have set out their approach to regulation in their policy statement, having taken into account local circumstances. This is dealt with in more detail at [Part 6 of this guidance](#).

Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

5.3. Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in [Part 6 of this guidance](#). A non-exhaustive list of licence conditions is provided at [Part 9 of this guidance](#).

5.4. A licensing authority will need to consider questions raised by the location of gambling premises when:

- formulating its statement of licensing policy
- receiving relevant representations to an application
- dealing with applications as a responsible authority in its own right considering applications before it.

5.5. In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a

clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

5.6. Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.

5.7. Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the [Licensing Act 2003 \(opens in new tab\)](#) and the [Licensing \(Scotland\) Act 2005 \(opens in new tab\)](#), in which context they have wider powers to also take into account measures to prevent nuisance.

5.8. In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the [Security Industry Authority \(opens in new tab\)](#) (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in [Part 9 of this guidance](#).

5.9. There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers. Further information can often be found on the websites of industry trade associations.

5.10. Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

Objective 2 : Ensuring that gambling is conducted in a fair and open way

5.11. Generally, the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness are likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.

5.12. In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in [Part 20 of this guidance](#).

Objective 3 : Protecting children and other vulnerable persons from being harmed or 244

exploited by gambling

5.13. In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (for example, bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

5.14. Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floorwalkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.

5.15. If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.

5.16. In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence conditions and codes of practice \(LCCP\)](#) or as [Gambling codes of practice](#). In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in [Part 9 of this guidance](#) and [Part 17 of this guidance](#).

5.17. The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.

5.18. Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's policy statement. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

2 Section 153 principles

5.19. S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:

- a. in accordance with any relevant code of practice under s.24 (the [LCCP](#))
- b. in accordance with any relevant guidance issued by the Commission under s.25 (this guidance)
- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

5.20. Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this guidance, any relevant Commission code of practice, its own statement of licensing policy, and the licensing objectives.

5.21. In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this guidance take precedence.

5.22. In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:

- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
- s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23. A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

5.24. The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

3 Codes of practice

5.25. The [LCCP](#) sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within the second part of the LCCP.

5.26. To assist licensing authorities in determining premises applications and inspecting premises, all the [codes of practice](#) are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues, and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the code of practice for equal chance gaming and the code for gaming machines in clubs and premises with an alcohol licence.

4 Good practice in regulation

5.27. Under the [Legislative and Regulatory Reform Act 2006 \(opens in new tab\)](#), any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation in the exercise of the function ([Legislative and Regulatory Reform Act 2006 \(opens in new tab\)](#), section 21). These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills⁵, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006 (opens in new tab). The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28. The statutory principles of good regulation and the Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act. The

[Legislative and Regulatory Reform \(Regulatory Functions\) Order 2007 \(opens in new tab\)](#), was amended by the [Legislative and Regulatory Reform \(Regulatory Functions\) \(Amendment\) Order 2009 \(opens in new tab\)](#), which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the [Gambling Act 2005 \(opens in new tab\)](#) - see [Part 3 of this guidance](#) and [Part 7 of this guidance](#).

5.29. Guidance produced by Regulatory Delivery now replaced by the Office of Product Safety and Standards seeks to assist local authorities in interpreting the requirements of the Regulator's Code for example in delivering risk-based regulation in relation to age restrictions.

Age-restricted products and services framework⁶ sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the Age-restricted products and services: a code of practice for regulatory delivery⁷.

⁵ Now the Department for Business, Energy and Industrial Strategy

⁶ [Age-restricted products and services framework \(opens in new tab\)](#)

⁷ [Age-restricted products and services: a code of practice for regulatory delivery \(opens in new tab\)](#)

5 Human Rights Act 1998

5.30. The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the [Human Rights Act 1998 \(opens in new tab\)](#) and in particular:

- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
- Article 6 – right to a fair hearing
- Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
- Article 10 – right to freedom of expression.

6 Other considerations

5.31. Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.

5.32. Licensing authorities must ensure that the application is in accordance with the relevant codes of practice, this guidance, the licensing objectives and the licensing authority's own policy statement. There is, therefore, significant scope for licensing authorities to request additional information from the applicant where they have concerns about both new applications and variations.

5.33. Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in [Part 9 of this guidance](#) and a non-exhaustive list of licence conditions is included at [Part 9 of this guidance](#) of this guidance.

5.34. Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

6 Application for premises variation (s.187): ‘material change’

7.51. Previous guidance from [the Department for Culture, Media and Sport \(opens in new tab\)](#) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination, but it is expected that a common sense approach will be adopted. When considering an

application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

7.52. In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as 'responsible authorities' and 'interested parties'. Representations from other parties are inadmissible. Further information on these categories can be found in [Part 8 of this guidance](#).

7.53. Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority's policy statement, or the Commission's guidance or codes of practice, are likely to be relevant.

7.54. The licensing authority will also need to consider if representations are 'frivolous' or 'vexatious'. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:

- who is making the representation, and whether there is a history of making representations that are not relevant
- whether it raises a 'relevant' issue
- whether it raises issues specifically to do with the premises that are the subject of the application.

7.55. The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission's approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

7.56. As explained earlier, the licensing authority's primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:

- a. in accordance with any relevant code of practice issued by the Commission
- b. in accordance with any relevant guidance issued by the Commission
- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

7.57. Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

Default conditions

9.27. S.169 of the Act gives licensing authorities:

- the ability to exclude from premises licences any default conditions that have been imposed under s.168
- the power to impose conditions on premises licences that they issue.

9.28. Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29. Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30. Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31. Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

4 Conditions that may not be attached to premises licences by licensing authorities

9.32. The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include 'the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

"In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c))."

The subsection starts by imposing a general duty on the authority to 'aim to permit the use of premises for gambling' and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the *OED*⁹ as meaning: '5. To calculate one's course with a view to arriving (at a point); to direct one's course, to make it one's object to attain. Hence fig To have it as an object, to endeavour earnestly'. The *Shorter OED*¹⁰ defines it as: '3. Direct one's course, make it one's object to attain, intend, try'. A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; 'aim to permit' provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority's duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

- (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

- (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
- (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
- (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

- 1.** Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
- 2.** The condition in paragraph 1 shall not apply to making gaming machines available for use.



Gambling Act 2005

2005 CHAPTER 19

PART 8

PREMISES LICENCES

Specific cases

172 Gaming machines

- (1) An adult gaming centre premises licence shall, by virtue of this section, authorise the holder—
 - [^{F1}(a) to make available for use on the premises a number of Category B gaming machines not exceeding 20 per cent of the total number of gaming machines which are available for use on the premises,]
 - (b) to make any number of Category C gaming machines available for use on the premises, and
 - (c) to make any number of Category D gaming machines available for use on the premises.
- (2) A family entertainment centre premises licence shall, by virtue of this section, authorise the holder—
 - (a) to make any number of Category C gaming machines available for use on the premises, and
 - (b) to make any number of Category D gaming machines available for use on the premises.
- (3) A casino premises licence for a regional casino using at least 40 gaming tables shall by virtue of this section authorise the holder to make gaming machines available for use on the premises provided that—
 - (a) each gaming machine is of Category A, B, C or D, and
 - (b) the number of gaming machines—
 - (i) is not more than 25 times the number of gaming tables used in the casino, and

Changes to legislation: There are currently no known outstanding effects for the Gambling Act 2005, Section 172. (See end of Document for details)

- (ii) is not more than 1250.
- (4) A casino premises licence for a large casino using at least one gaming table, or for a regional casino using fewer than 40 gaming tables, shall by virtue of this section authorise the holder to make gaming machines available for use on the premises provided that—
- (a) each gaming machine is of Category B, C or D, and
 - (b) the number of gaming machines—
 - (i) is not more than 5 times the number of gaming tables used in the casino, and
 - (ii) is not more than 150.
- (5) A casino premises licence for a small casino using at least one gaming table shall by virtue of this section authorise the holder to make gaming machines available for use on the premises provided that—
- (a) each gaming machine is of Category B, C or D, and
 - (b) the number of gaming machines—
 - (i) is not more than [^{F2}5 times] the number of gaming tables used in the casino, and
 - (ii) is not more than 80.
- (6) The Secretary of State may by regulations—
- (a) define “gaming table” for the purposes of subsections (3) to (5);
 - (b) provide that a gaming table is to be treated as being used in a casino for the purposes of those subsections only if used—
 - (i) for a specified purpose,
 - (ii) in specified circumstances, and
 - (iii) to a specified extent;
 - (c) provide for a number of tables are to be treated as if they were a single gaming table in specified circumstances.
- (7) A bingo premises licence shall, by virtue of this section, authorise the holder—
- [^{F3}(a) to make available for use on the premises a number of Category B gaming machines not exceeding 20 per cent of the total number of gaming machines which are available for use on the premises,]
 - (b) to make any number of Category C gaming machines available for use on the premises, and
 - (c) to make any number of Category D gaming machines available for use on the premises.
- (8) A betting premises licence shall, by virtue of this section, authorise the holder to make up to four gaming machines, each of which must be of Category B, C or D, available for use.
- (9) But subsection (8) applies to a betting premises licence in respect of a track only if the holder also holds a pool betting operating licence.
- (10) A premises licence may not (whether by way of condition or otherwise)—
- (a) make provision about the number or categories of gaming machine that may be made available for use that contradicts a provision of this section,
 - (b) make provision that contradicts a provision of regulations under section 236, 240 or 241, or

Changes to legislation: There are currently no known outstanding effects for the Gambling Act 2005, Section 172. (See end of Document for details)

- (c) make provision of a kind prohibited by regulations under any of those sections.
- (11) The [^{F4}appropriate Minister] may by order amend a provision of this section so as to vary—
- (a) the number of machines authorised by a specified kind of premises licence;
 - (b) the category of machines authorised by a specified kind of premises licence.
- [^{F5}(12) In subsection (11) “the appropriate Minister” means—
- (a) the Scottish Ministers, so far as, in the case of a betting premises licence in respect of premises in Scotland and not in respect of a track, the order varies—
 - (i) the number of gaming machines authorised for which the maximum charge for use is more than £10, or
 - (ii) whether such machines are authorised;
 - [^{F6}(aa) the Welsh Ministers, so far as, in the case of a betting premises licence in respect of premises in Wales and not in respect of a track, the order varies—
 - (i) the number of gaming machines authorised for which the maximum charge for use is more than £10, or
 - (ii) whether such machines are authorised;]
 - (b) otherwise, the Secretary of State.]

Textual Amendments

- F1** S. 172(1)(a) substituted (13.7.2011) by [The Gambling Act 2005 \(Gaming Machines in Adult Gaming Centres and Bingo Premises\) Order 2011 \(S.I. 2011/1710\)](#), arts. 1, **2** (with arts. 4, 5)
- F2** Words in s. 172(5)(b)(i) substituted (22.7.2025) by [The Casinos \(Gaming Machines and Mandatory Conditions\) Regulations 2025 \(S.I. 2025/735\)](#), regs. 1, **3(2)**
- F3** S. 172(7)(a) substituted (13.7.2011) by [The Gambling Act 2005 \(Gaming Machines in Adult Gaming Centres and Bingo Premises\) Order 2011 \(S.I. 2011/1710\)](#), arts. 1, **3** (with arts. 4, 5)
- F4** Words in s. 172(11) substituted (23.5.2016) by [Scotland Act 2016 \(c. 11\)](#), **ss. 52(3)**, 72(7) (with s. 52(6))
- F5** S. 172(12) inserted (23.5.2016) by [Scotland Act 2016 \(c. 11\)](#), **ss. 52(4)**, 72(7) (with s. 52(6))
- F6** [S. 172\(12\)\(aa\)](#) inserted (1.4.2018) by [Wales Act 2017 \(c. 4\)](#), **ss. 58(1)**, 71(4) (with s. 58(3), Sch. 7 paras. 1, 6); [S.I. 2017/1179](#), reg. 3(l)

Modifications etc. (not altering text)

- C1** S. 172 modified (1.9.2007) by [Categories of Gaming Machine Regulations 2007 \(S.I. 2007/2158\)](#), regs. 1(b), **6(3)**

Commencement Information

- I1** [S. 172](#) in force at 1.9.2007 by [S.I. 2006/3272](#), art. 2(4)(5), **Sch. 3B** (as inserted by [S.I. 2007/2169](#), arts. 3, 6, **Sch.**) (with [Sch. 4](#)) (as amended by [S.I. 2007/1157](#), **arts. 7-12** and [S.I. 2007/2169](#), **arts. 7-11**; and (22.7.2025) by [S.I. 2025/734](#), arts. 1(b), **2**)