

ANNEXE

Palace Casino, Great Yarmouth Palatial Leisure Limited

POLICY STATEMENT

1. **PROOF OF AGE SCHEME**

Palace Casino operates a Challenge 21 Policy and any guest who appears to be under the age of 21 years will be required to provide photographic ID prior to entry. The only acceptable identification will be a driving licence, passport or a foreign identity card from a recognized jurisdiction.

2. **CCTV**

Palace Casino will have extensive and comprehensive CCTV coverage and the images will be retained for a minimum of 30 days. The system used is a digital one and the system covers all areas of the Casino.

3. **PHYSICAL SEPARATION OF AREAS**

There will be no gambling facilities in the Restaurant, Reception areas or toilets. Please see plans for details.

4. **PROTECTION OF CHILDREN AND THE VULNERABLE**

Palatial Leisure Limited has operated a 1968 Act Casino at the site since 2007. The policies in place for the protection of children and the vulnerable will remain.

Please see attached Operational Policy Statement demonstrating how Palatial Leisure Limited ensure that vulnerable persons are protected from being harmed or exploited by gambling and promote safe and responsible gambling practices on its premises.

Palace Casino, Great Yarmouth
Operation Policy Statement

As a company, Palatial Leisure Limited, we are committed to our casino being operated strictly in accordance with the current gaming legislations and guidelines and all other relevant requirements and obligations.

Our management and staff will be trained to exacting standards and we intend to encourage transparent working practices and full cooperation with the relevant governing bodies.

As such we will abide by the following policies;

1. Preventing Crime and Disorder.
2. Fair and Open Provisions.
3. Social Responsibility.
4. Protection of Children and Vulnerable People.

Preventing Crime And Disorder

In order to prevent disorderly conduct from members or their guests, the following procedures will be adhered to;

- Club Rules will be prominently displayed in the Reception area, in applying for membership; the prospective member will abide by these Club Rules as a condition of membership of the club. Members introducing guests to the club have a responsibility to ensure that their guests conduct is acceptable within these rules.
- Any behaviour that is deemed unacceptable by the management of the club may result in withdrawal from the premises and cancellation of membership.
- Management will complete comprehensive Incident Reports to assist in facilitating the monitoring of disorderly behaviour.
- Drunken behaviour will not be tolerated. Any individual who appears to be under the influence of intoxicating substances will not be admitted. Similarly, any individual who exhibits intoxication whilst on the premises will be asked to leave.
- Any incidents of a serious nature will be reported to the relevant bodies, i.e. Police, Health and Safety Executive etc.
- All staff will be comprehensively trained in customer service standards and conflict management guidance; this training will be regularly reviewed.
- Key personnel will be provided with personal attack alarms, these will be monitored externally and will provide a direct link to the local Police Station.

To minimise the risk of any criminal activity taking place on or around the company premises, the following procedures will be adhered to;

- The acceptance of cheques and debit/credit cards will be in strict accordance with current legislation and guidelines.
- Any attempt at fraudulent activity will be reported to the Police immediately.
- Relevant personnel will receive full training in armed threat procedures and financial fraud protection.

- All relevant transactions will be recorded within company software. Each player will have an individual profile for this purpose (Player Tracking).
- Staff will be trained in the Prevention and Detection of Money Laundering. All suspicious transactions will be reported to the Company Money Laundering Reporting Officer via the prescribed documentation. It will be the responsibility of the MLRO to report further to SOCA.
- The exchange of cash, chips, cheques, debit/credit card payments etc. will be in strict accordance to Company Procedure.
- The company will pursue, via legal means, any incidence of theft be these internal or external.
- All relevant staff and management will undergo Criminal Records Bureau checks, Gambling Commission certification procedures and any other relevant certification pertaining to their role.
- Any person (inclusive of employees) found to be in possession of drugs or other illegal substances will be reported to the Police and Gambling Commission where applicable.
- Cash will be held in secure areas with regular banking within Company Procedure. All safes will employ a time lock and time delay mechanism.
- Customer vehicles will be valet parked in our secure car parking facilities. Should a customer wish to collect their car themselves, we will provide a staff escort.
- CCTV coverage of the premises will be held for a minimum period of thirty days.
- Any member or guest involved in an attempt to cheat, enter into collusion with staff or otherwise illegally obtain funds or goods at the expense of the company will be withdrawn and have their membership cancelled permanently.

As a company, we accept that we cannot prevent illegal activities taking place; however all reasonable efforts will be made to reduce the risk of criminal activity on company premises. Any evidence or suspicion of illegal activity will be reported to the relevant bodies.

Fair and Open Provisions

Palatial Leisure Limited and its employees and servants are committed to providing an open and honest approach to all gaming related charges, rules and policies of club activities.

- The Rules and Practices of the games will be made available for inspection, upon request.
- Within the Card Room, the rules of any games played will be clearly displayed and available for members and guests to peruse at all times.
- All relevant notices for Card Room Games will be displayed in the Card Room in strict accordance with Gambling Commission Guidelines. This will include any participation fees, particular game rules, a list of prizes and a list of winners of any competition. All notices will be displayed for a minimum of the prescribed times.
- There will be no changes to any rules or subsequent participation fees without a minimum of twenty-four hours notice.
- House Edge leaflets will be available and prominently displayed within the Reception area.
- All gaming machines will be operated within strict accordance to current requirements, they will also clearly display the minimum statutory information. Comprehensive records will be kept with respect to gaming machines to ensure the minimum percentage payout or greater is yielded by each individual machine.
- The minimum and maximum bets for all table games will be prominently displayed on the table or terminal.
- On request, the rules of any game will be explained to any new member or guest and "How to Play" leaflets will be made available.
- A fair and consistent approach will be taken when dealing with customer disputes and concerns.
- All gaming will be fairly and properly conducted without disturbance or disorder.

The Club Rules will be enforced to ensure that all gaming is conducted in a fair and honest manner, for the benefit and enjoyment of all members and guests.

Social Responsibility

Restrictions are in place to ensure that no person under the age of eighteen years will be permitted entry to the casino during operating hours.

- Any guest who appears to be under the age of twenty-one years will be required to provide photographic identification prior to entry. The only acceptable identification will be, a driving licence, a passport or a foreign identity card from a recognised jurisdiction.
- Any member who attempts to sign in a guest who is under the age of eighteen years will have their membership withdrawn and will be excluded from the casino.

The company is aware that some individuals may exhibit signs of problem gambling. We are committed to positively addressing this issue. As such, the following procedures are in place;

- All management will receive training with regards to problem gambling and how to identify the behaviour of a problem gambler.
- The company will provide literature to the customers, which will explain the signs of problem gambling and the names and contact details of the organisations whom the individual may speak to for assistance. The leaflets will be prominently displayed in Reception and in the rest areas.
- Any member, who so wishes, will be afforded the opportunity to speak with a manager in a private environment should they feel that they have a problem gambling issue.
- Palatial Leisure Limited will operate a strict self-exclusion policy. At any time a member or guest can submit a request in writing to be excluded from the casino. The request may be made on company pro forma and will state that the individual has problem gambling issues. On receipt of this request the member or guest will then be excluded for a minimum period of six months.
- There will be no exceptions to the minimum self-exclusion period.
- Any self-excluded individual will not be contacted by the casino by any means for any reason, during their period of self-exclusion.

- Following a period of self-exclusion, the individual may reapply, in writing to the Operations Director, for his membership or guest status to be reconsidered. The Operations Director must demonstrate good reason to believe that the individual has addressed the problem gambling issue prior to reinstatement. The Operations Director will complete an Incident Report outlining his or her decision.
- Palatial Leisure Limited fully supports the work of Gamcare and R.I.G.T. The company will make a substantial charitable contribution each year of business.

With regards to marketing and advertising, Palatial Leisure Limited will fully comply with advertising codes of practice and UK gaming legislation, in particular;

- No advertisement published or promulgated by the company will be seen to encourage irresponsible or excessive gambling. Advertisements will not be seen to be harmful or exploitative of young people or any other vulnerable people. Any advert will be directed towards those over the age of eighteen years and will not feature people who appear to be under the age of twenty-five years.

The above procedures will be complied with to ensure that all gaming activities taking place at The Palace Casino are conducted in a socially responsible manner.

Protection of Children and the Vulnerable

a) Gaming By Young People

As a company, Palatial Leisure Limited is committed to providing a safe and regulated environment for all members and guests over the age of eighteen years. To prevent entry to the premises by young persons under the age of eighteen years, the following procedures are in place;

- Any individual applying for membership, (or being signed in as a guest by an existing member), who appears to be under the age of twenty-one years, must present photographic identity prior to being admitted to the premises. In this instance and for the avoidance of doubt, acceptable photographic identification will be; a

passport, a driving licence or a foreign identity card from a recognised jurisdiction.

- Underage individuals who repeatedly attempt to gain entry to the premises will be logged and carefully monitored.
- Any member who is discovered attempting to sign in any underage guest, will have their membership withdrawn and will be excluded from the casino.
- No person under the age of eighteen years will be permitted entry to any part of the casino whilst gaming is taking place.

b) Vulnerable People and Problem Gambling

In order to minimise the risk of problem gambling and to protect the vulnerable, the following procedures are in place;

- The company will provide literature to the customers, which will explain the signs of problem gambling and the names and contact details of the organisations whom the individual may speak to for assistance. The leaflets will be prominently displayed in Reception and in the rest areas.
- All management will receive training with regards to problem gambling and how to identify the behaviour of a problem gambler.
- Management will approach customers who appear to be exhibiting problem gambling behaviour, in a sensitive manner and offer the necessary information and literature to support those individuals who appear to have a gambling problem. The manager may discuss the option of self-exclusion.
- At any time a member or guest can submit a request in writing to be excluded from the casino. The request may be made on company pro forma and will state that the individual has problem gambling issues. On receipt of this request the member or guest will then be excluded for a minimum period of six months.
- Where there are clear indicators of problem gambling behaviour, the individual will be excluded from the casino and have their membership withdrawn.

- The effective use of company reporting and player profiling will be used to establish the normal level of play for an individual. Customers who appear to be gaming beyond their means and where this is felt to be a sign of problem gambling, will be given an opportunity to discuss the matter with a member of the management, in confidence.

The company is committed to protecting young persons and the vulnerable from gaming. As such, we will ensure that all reasonable efforts are made to prevent gaming activities becoming a problem for our members and their guests.

The Prevention of Money Laundering and Combating the Financing of Terrorism

Palace Casino will adhere to all of the requirements of the Prevention of Money Laundering and Combating the Financing of Terrorism Regulations 2007.

Procedures will be included in the Reception, Cash Desk, Gaming and Security Manuals to ensure that full compliance is achieved.

All holders of PFL/PML and Reception staff will receive training on AML/CFT. A signed declaration that this training has been received and placed on their personnel files. A central record of all training will also be maintained.

All PFL/PML and Reception staff will receive training on induction or transfer.

Refresher training will be undertaken as changes to the regulations occur or if needed as identified by training need analysis.

Michael Wiseman Compliance Director will be the Nominated Officer and will delegate to John Robinson Operations Director or another Director in his absence.

The Casino will operate CDD on entry as a requirement of membership. Records of ID seen will be maintained electronically.

Risk assessments on the Risk level of Customers will be undertaken by the Operations Director or his delegate.

Guests will be allowed one grace visit before CDD is sought. All relevant departments will be made aware as threshold Limits will then apply.

Photographic ID of members and Guests will be available in the Pit/Cash Desk to ensure compliance with ID requirements in the event of threshold breach.

Gaming machines will be TITO to enable tracking. Records of Drop/Win on all transactions will be made at the tables and cash desk and records maintained electronically in the cash desk.

SAR will be emailed to the Nominated Officer and a hard copy filed locally.

Contact details for the Nominated Officer will be displayed in all staff areas to enable staff to contact the nominated Officer directly if required.

Registers of PEP and Household names will be held in hard copy on Reception.

Details of all relevant Business Transactions will be communicated to the Nominated Officer by the Directors or Administrator.

Guests on grace visits will have no CCF facilities extended until CDD has taken place.

The Nominated Officer will review the SAR file, Win/Drop Figures, PEP and Household name file on a weekly basis.

failure to comply with the Regulations will be considered Gross Misconduct, investigated and instances reported to the Gambling Commission.