



Safer Gambling Policy

NOTE:

All amendments to this Policy must be authorised by the Policy Owner and notified to the Casino Regulator within 7 days of approval.

Contact Group Compliance for further details.

Policy Details

Policy Owner

Group Chief Risk Officer

Effective Date

25 March 2025

Last Review Date

9 October 2025

Next Review Date

11 November 2025

Approved by

The Star Entertainment Group Board

Document Control

Version

1.5

TABLE OF CONTENTS



01	Purpose and Scope	2
02	Policy Requirements	2
03	Roles and Responsibilities	5
04	Breaches of this Policy	7
05	Definitions	7
06	Relevant Legislation and Regulations	8
07	Related Policies and Documentation	8
08	Feedback and Questions	9
	Appendix A – Gambling Harm Indicator Matrix	11

01 Purpose and Scope

The Star Entertainment Group Limited (TSEG, “we”, “us”, “our”) provides a variety of engaging gambling and entertainment experiences. The Safer Gambling Policy (this Policy) sets out industry-leading Safer Gambling principles, guidelines, and roles that enable and supports guests to gamble for their entertainment in a way that prevents and minimises harm to individuals and to the broader community.

TSEG commits to meeting both the requirements of and the spirit of both NSW and QLD regulations and stakeholder expectations. This Policy applies to all properties operated by TSEG.

This Policy concerns Safer Gambling and should be read in conjunction with NSW ICM 13: Responsible Gambling & Exclusions, QLD ICM P: Safer Gambling & Exclusions, the Casino Control Act 1992 (NSW) and the Casino Control Act 1982 (QLD). TSEG maintains a separate policy in relation to exclusions. Please refer to the Exclusion Policy for more detail on the guest exclusion process.

TSEG ensures our Safer Gambling Policy and other policies related to Safer Gambling are available upon request.

This Policy applies to all TSEG Directors, Executives, Team Members, Contractors at all TSEG locations.

02 Policy Requirements

2.1 Safer Gambling Principles

2.1.1 As a responsible casino operator, TSEG will seek to apply the relevant principles of harm reduction through a public health framework. Our core Safer Gambling principles are:

Guiding Principle	Description
Providing a Safe and Supportive Gambling Environment	- We aim to provide a safe, supportive and inclusive gambling environment where Safer Gambling is a critical part of our organisational culture. - We enable our guests to enjoy gambling in a controlled manner. - We actively promote the leisure and entertainment options we offer other than gambling. - We avoid stigmatising our guests, ensure that we demonstrate care and concern for their wellbeing, and encourage and reward positive play. - We do not allow excluded persons or minors into our casinos, and we actively monitor to ensure they do not enter. - We provide a facility for anyone to self-exclude remotely via our website, negating the need for them to visit a property to do so. - We apply Safer Gambling initiatives and standards across all Star properties as appropriate and legally permissible.
Preventing and Minimising Harm	We have established processes to identify indicators of risk to our guests and we respond appropriately to prevent and/or minimise gambling related harm.

Guiding Principle	Description
	• TSEG has a specially trained and dedicated Safer Gambling team on duty at all times. • We recognise that gambling harm is not limited to people experiencing gambling difficulties and that they may be experiencing other concurrent challenges like substance abuse or mental health issues. • We understand that both the risk of gambling harm and severity of gambling harm fall along spectrums, and that any guest may have gambling experiences that require support from us as a provider of gaming services. • As a provider of gaming services, we recognise our unique position within a public health approach to gambling harm prevention and aim to proactively intervene with guests at risk of harm. • TSEG will issue an Exclusion and/or Withdrawal of Licence in circumstances when a parent or guardian has been found within the Casino Boundary where a minor (person under 18) in their care has been left unattended outside the Casino Boundary but within the TSEG property and has been assessed by TSEG as 'at risk'. • We use technology, including facial recognition, to detect concerning gambling behaviour and assist those trying to refrain from or manage their gambling at our properties.
Training	• We ensure that all Team Members understand their role and responsibilities to uphold TSEG's Safer Gambling practices, and to identify and report or refer guests who may be at risk of gambling related harm. • Dedicated Team Members are trained and always available to educate guests about where and how they can get help when needed, and to help guests set gambling limits and self-exclude themselves from gambling. • All Team Members complete appropriate Safer Gambling training as part of their induction, prior to the commencement of their role-based tasks, as well as ongoing Safer Gambling refresher training.
Enabling informed decision-making	• We ensure our guests have access to the information they need to make informed choices about their participation in gambling. This includes providing our guests with player activity statements and information about the risks and potential harms associated with gambling, how our games work and the odds or likelihood of winning and losing. • This Safer Gambling Policy, information about how guests can self-exclude and the details for advice and support (counselling) services will be available at all times on property, and on TSEG app and website. A copy of this Policy will be provided to a guest upon request. • We promote safer gambling tools, including budget and limit setting, Voluntary Gaming Suspension, and Guest Support contact details.

Guiding Principle	Description
Affordability	- We encourage and support our guests to gamble safely by helping to manage the amount of time and money they spend gambling in relation to their financial resources. This necessitates understanding aspects of guests' livelihoods such as their income and wealth. - We actively promote the use of time and financial budget tools.
Time Play Management	- We will monitor the length of time carded guests spend engaged in gambling. We take reasonable steps to monitor the length of time uncarded guests spend engaged in gambling. - TSEG is committed to reducing instances of gambling-related harm and will actively engage with guests whenever necessary including through early intervention measures.
Gambling Incident Register	- TSEG maintains a dedicated gambling incident register to record all incidents actually or potentially related to gambling harm. - All Team Members are required to report any actual or potential gambling harm incidents for inclusion in the register.
Advertising and Promotional Initiatives	- TSEG's Marketing Policy requires that it does not publish or cause to be published, marketing material or promotional activities which encourage irresponsible use of gambling services or have the potential to contribute to gambling harm among our guests (i.e., advertising that is attractive to minors, advertising that suggests gambling improves a person's social standing or financial prospects and advertising that targets disadvantaged groups or minorities). - Marketing teams are trained in appropriate advertising guardrails that reflect harm minimisation principles, and actively promote Safer Gambling tools, support services and public awareness campaigns. - All marketing advertisements, promotions and activities are vetted by Safer Gambling prior to their commencement. - We promote independent advice and support (counselling) services on property, within marketing communications and on our app and website. - We have systems in place to ensure that personalised marketing material is not sent to any excluded person.

03 Roles and Responsibilities

All TSEG Team Members have access to this Policy and will be provided with training on this Policy and obligations under it. All TSEG Team Members are responsible for creating an environment in which guests can gamble safely and where care is paramount. The Safer Gambling team, including Line 1 and Line 2 Safer Gambling Team Members, receive regular training, including in how to respond to guests displaying indicators of gambling harm.

Role	Responsibilities
All Team Members	All Team Members are responsible for showing awareness of Safer Gambling practices and knowing where to access further information. Team Members must: • participate in Safer Gambling training, including refresher courses • be able to identify and respond to indicators of gambling harm • be able to direct guests to relevant information and assistance • respond immediately to guests requesting self-exclusion and make appropriate referrals • report any suspected instances of intoxicated guests attempting to gamble • report any suspected instances of unattended or unsupervised minors • respond to or report to a Leader any gambling-related incidents • not allow someone in the casino if they believe that person to be a minor or an excluded person • understand the complaint resolution procedure or refer the guest to assistance
TSEG People Leaders	Members of management are responsible for: • ensuring Team Members complete role appropriate training • providing support and coaching about identifying and responding to indicators of gambling harm • preventing intoxicated guests from being allowed to gamble (or remain on site) • ensuring guests requesting self-exclusion are referred to Safer Gambling immediately • interacting with guests at risk of gambling related harm to ensure they receive appropriate support and intervention
Group Leadership Team (GLT)	Property CEOs have ultimate accountability for compliance with this Policy for their respective properties. Property CEOs and other members of the GLT are responsible for: • providing leadership and driving ownership of Safer Gambling practices and awareness across their areas of responsibilities • driving culture change to support a focus on harm prevention and minimisation across TSEG
Line 1 Safer Gambling Team	Line 1 Safer Gambling Team are responsible for: • coordinating Safer Gambling activities across the property and leading the property-based Safer Gambling initiatives

Role	Responsibilities
	• providing appropriate information and support to assist guests and Team Members with gambling related problems • conducting welfare checks with guests to identify potential risk factors and indicators of gambling harm • managing time-play alerts and engaging with guests to manage temporary prevention of entry and other harm prevention actions • supporting management and internal committees as appropriate
Line 2 Safer Gambling Team	Line 2 Safer Gambling Team are responsible for: • developing and executing TSEG's Safer Gambling strategy • providing proactive Safer Gambling education and awareness • providing appropriate information and support to assist guests and Team Members with gambling related problems • implementing an assurance program to ensure compliance with established policies, SOPs and practices • establishing effective links with gambling-related support services • maintaining and reporting on the gambling incident register • responding to reported incidents in the Safer Gambling incident register • supporting management and internal committees as appropriate • approving Safer Gambling procedures • influencing external Safer Gambling strategies • ensuring marketing materials align with harm prevention and minimisation principles
Property-Level Compliance Committees	Oversee the TSEG's compliance with regulatory and ICM obligations related to Safer Gambling.
The Safer Gambling, Governance and Ethics Committee	Members of The Safer Gambling, Governance and Ethics Committee (SGGEC) are responsible for recommending approval of TSEG's Safer Gambling Policy to The Board. The SGGEC also approves the Safer Gambling Strategy, including objectives, goals and initiatives for a company-wide integrated approach to creating Safer Gambling environments and preventing and minimising gambling-related harm to individuals, families and the community. The SGGEC operates under a documented charter which sets out the Committee's objectives in relation to overseeing Safer Gambling activities at TSEG.

04 Breaches of this Policy

TSEG expects all Team Members comply with this Policy to meet our applicable obligations and commitments to regulators, guests, and the broader community. Non-compliance with this Policy may result in business disruption, reputational damage, or breach of legal and regulatory obligations.

Behaviour that does not align with the principles set out in this Policy should be escalated to the Team Member's relevant Line Manager or through one of the Raise It reporting channels. Serious or repeated behavioural misalignment may be a breach of our Code of Conduct and could result in disciplinary action.

Any actual or suspected breach of this Policy that may involve non-compliance with legal or regulatory obligations must be reported as soon as possible in line with the Incident and Breach Management Policy.

05 Definitions

Term	Definition
Act	Means an Act passed by a Parliament, either State or Federal.
Contractor	Means one of the following: - Independent contractors: self-employed individuals or are part of a proprietary company (ABN) usually engaged for project work and paid for results achieved - Contingent workers: individuals engaged to ensure coverage or support for TSEG roles. For example, a contingent worker is in a role that is vacant, whilst the position is being recruited - Consultants: individuals engaged to deliver set outcomes, provide advice or recommendations, and are usually paid on completion of milestones or deliverables. Procurement is to be engaged when considering using consultants to agree the terms and conditions with TSEG
Gambling Harm	Any form of harm caused or exacerbated by a person's gambling. Harm can include financial, social or psychological harm and affect the individual, their close associates or the wider community. Harm can result from an episode or a pattern of visits. Indicators of gambling harm are set out in the Safer Gambling and Exclusion SOP.
Gambling-related Incident	An occurrence of a gambling action or situation that leads to a decrease in the health or wellbeing of an individual, family unit, community, or population.
Interaction	Liaising with a guest in response to a potential indicator of gambling harm with the aim of determining whether the guest is at risk of harm and requires an intervention.

Term	Definition
Intervention	Any specialised interaction in response to a gambling harm indicator conducted with the aim of assessing the guest's welfare and the risk of TSEG allowing gambling to continue. Interventions are conducted by the Safer Gambling team or another suitably trained Team Member (such as a senior manager). All interventions must include offering the guest information about the Safer Gambling Policy, self-exclusion and counselling services available.
Safer Gambling	Safer Gambling is the provision of safe, socially responsible, and supportive gambling environments where the potential for harm associated with gambling is prevented or minimised and people can make informed decisions about their participation in gambling. It occurs because of the collective actions and shared ownership of individuals, communities, the gambling industry, and government.
Team Member	Means full-time, part-time and casual employees of TSEG.
TSEG	The Star Entertainment Group.

06 Relevant Legislation and Regulations

This table below provides a list of relevant legislation and regulations for this Policy. Please note this is not an exhaustive list.

- *Casino Control Act 1982 (QLD)*
- *Casino Control Act 1992 (NSW)*
- *Casino Control Regulation 1999 (QLD)*
- *Casino Gaming Rules (QLD)*
- *Privacy Act 1988 (Cth)*
- *Queensland Responsible Gambling Code of Practice*

07 Related Policies and Documentation

The following policies and documentation related to this Policy can be found on TSEG's intranet site.

- Code of Conduct
- Exclusions Policy
- ICM 13 – Responsible Gambling & Exclusions (NSW)
- ICM P – Safer Gambling & Exclusions (QLD)
- Incident and Breach Management Policy
- Safer Gambling & Exclusions SOP (NSW)
- Safer Gambling & Exclusions SOP (QLD)
- Unattended Minors Management Procedure

08 Feedback and Questions

Please contact the Safer Gambling team or Group Compliance for any questions relating to this Policy.

Version	Amended by	Reason for change	Details of changes	Date
1.0	Safer Gambling / Compliance Team	Updated in line with ICM updates.	Policy created from Responsible Gambling Policy	20 Oct 2023
1.1	Customer Lifecycle Management Team	Updated in line with TSEG Remediation Plan requirements (Milestone 6.2.5).	Updates to Purpose & Scope, with changes approved by General Manager of Safer Gaming Compliance.	28 Feb 2024
1.2	Safer Gambling / Compliance Team	Annual Review.	Updates to include relevant legislation and regulations, with changes made to roles and responsibilities and policy requirements. Other minor changes to wording to align with evolution in Safer Gambling terminology.	25 Nov 2024
1.3	Safer Gambling / Compliance Team	Updated in line with safer gambling program uplift.	Changes made to the Safer Gambling Principles to reflect the use of technology in continuously enhancing safer gambling tools and offerings.	3 Mar 2025
1.4	Safer Gambling	Minor Change.	Clarification of Preventing and Minimising Harm Guiding Principle in relation to minors left unattended.	2 May 2025
1.5	Group Compliance	Minor Change.	Inclusion of Unattended Minors Management Procedure in section 07 and update to section 04.	9 Oct 2025

Appendix A – Gambling Harm Indicator Matrix

Strong Indicators	What to do
• Requests exclusion • Advises that they are a problem gambler or are experiencing problems with gambling • Presents with emotional distress due to gambling – expressing suicide ideation, depression/anxiety, crying, holding head in hands, shaking, outburst towards staff or machine • Presents in an emotional state – comments regarding gambling behaviour/impacts on personal life/finances • Leaves minors unattended while gambling • Third party raises concerns • Attempts suicide or harms self • Displaying anger – hitting or damaging a gaming equipment out of anger • Displaying rude, violent, or aggressive behaviour	Refer to a Leader, Safety & Security or Safer Gambling team: <i>Approach the guest sensitively and discretely:</i> • Assist with exclusion request. • Request a break is taken. • Provide guest with appropriate Safer Gambling collateral. • Offer to assist guest in contacting a support service or BetCare. • Safer Gambling Policy (if requested). • Liaise with Safety & Security and the Casino Manager on duty for appropriate crisis support, Report in Trackvia or as incident on Star Connect portal: Raise Incident. The Safer Gambling team will record the incident in Protecht.
General Indicators	What to do
Intensity and Frequency of Play • Significant changes in patterns of play – time/money spent, behaviour • Gambling every day of the week • Spending all available time or money on gambling • Gambling for long periods of time with minimal breaks • Disconnect with time spent gambling, including missing meals, work, study, family commitments, etc. • Falling asleep at a gaming machine or table game • Inability to stop gambling whether winning or losing • Gambling at the casino for more than 12 hours in a 24-hour period • Gambling at the casino for more than 48 hours in a week	Interaction with the guest and/or report to a Leader, Safety & Security or Safer Gambling: • How are you going/how are things going for you? • How's the game? • What are your plans for the rest of the day? • How long do you think you might be here for? • Have you set any limits for today? • Have you had a break? • It is part of our service to remind guests of the importance of taking breaks. • Have you had something to eat or drink? • Perhaps it is time to take a break? • Maybe some fresh air could be helpful? • Taking a break will allow you to rest and refresh, you are welcome to return another day. • Report in Trackvia or as incident on Star Connect portal: Raise Incident. The Safer Gambling team will record the incident in Protecht. Is everything OK? You don't seem to be enjoying yourself. • We've noticed. Are you ok?
Visible Emotion • Personalising machines e.g., treating the machine affectionately or acting as if it is a friend • Trying obsessively to win on a particular machine • Blaming their loss on the staff or gaming machines	

General Indicators	What to do
Social Behaviour • Deterioration of hygiene or appearance over time • Change to behaviour/personality • Loss of relationship, job, or educational opportunity • Conceals their presence at the venue - asks staff not to let others know they are there • Gambles intensely without reacting to what's going on around him/her • Attempt to conceal gambling - plays uncarded • High consumption of alcohol while gambling • Withdrawal from social interactions • Friends or relatives enquire if the person is at the Casino • Unrealistic expectation of the chance/odds of winning	• Is there something we can do to help? It is part of our service to check in and offer support. • Can I offer you some information from the Guest Support team? • Can we offer some information from Support Services that may be helpful? • There are free counselling and Support Services – can we assist you in contacting one? • Have you considered taking a break from gambling – we can explain self-exclusion? • There are free counselling and Support Services – can we assist you in contacting one? • Report in Trackvia or as incident on Star Connect portal: Raise Incident. The Safer Gambling team will record the incident in Protecht.
Money • Relying on others (family or friends) to provide money as the result of gambling losses • EFTPOS repeatedly declined • Putting large wins back into a machine and continuing to play • Getting cash out ATMs on multiple occasions • Trying to borrow or 'scam' money or sell valuables to others for gambling, asking others to place bets • Not having money for meals or car parking or transport home • Frequent demand for complimentary items or that complimentary points be converted to cash • Expressing concern with their spending • Avoids Cashiers and only uses automatic cash facilities • Significant spend compared to employment or remuneration details	