

Appendix 7 – Supporting Information submitted by the Applicant

Licensing Team
Haringey Council
Level 1 North- River Park House
225 High Road
WOOD GREEN
London
N22 8HQ

Our ref PW/KL/CHO002-4-5/5402

Your ref

21 April 2021

Dear Sirs

Chongie: T/A Little Vegas Application for a Gambling Act Premises Licence - 17 High Road, Wood Green, M22 6BH

We write with reference to the application for the Adult Gaming Centre premises licence under the Gambling Act 2005.

The last date for representations for this application was 10 March 2021. I appreciate that the authority has issues with setting up virtual hearings, but my clients interests are being prejudiced in relation to these premises as they are being pursued by the landlord to finalise the long term commitment to the property.

Planning has been granted for these premises to be used as an Adult Gaming Centre. Prior to this application, the premises traded as a bookmakers for many years. Therefore we are not seeking a brand new Gambling Act authorisation at this site, we are seeking to replace a betting premises licence with an AGC premises licence. It is our experience that AGC premises have significantly less issues in their pattern of trading than some betting shops.

We would seek again an opportunity to discuss this application with the responsible authorities to see if we can reach agreement and remove the need for a hearing to take place.

Please find a schedule of conditions which we offer in relation to this site. As we understand the position, this would lead to an Adult Gaming Centre licence with the highest number of conditions attached to a Gambling Act premises licence in this division.

Our clients are very confident that they can operate in such a way that will be reasonably consistent with the licensing objectives - the statutory test under the Gambling Act. They would suggest that with these conditions they will far surpass the statutory test and will promote the licensing objectives without issue.

We would also offer that the premises would trade between the hours of 08:00 and 23:00 on Mondays to Sundays. As you will be aware there are no default hours in relation to AGC premises licences under the Gambling Act and are therefore capable of operating 24 hours. However my clients are happy to offer this restriction as it would be in line with the planning permission which has been granted at the premises and reflects the locality.

The only condition of substance which is not being offered by my clients is Condition 7 in the police representation which is "under the remit of preventing crime and in the interest of deterrence that a suitably

trained and qualified SIA security guard is posted to the premises each day from noon until 23:00.” We are not aware of any AGCs which require a door supervisor to be at the premises and in the circumstances would suggest that this would be a disproportionate condition and certainly wouldn’t be needed by the operator to promote the licensing objectives for premises of this type.

We would hope in the circumstances that the offer of a significant number of conditions and restricting the opening time of the premises would allow the officers to review their position and in all of the circumstances accept that this is an application that could be granted without the need of going to a licensing sub-committee.

If we are unable to satisfy you in those terms then we would be grateful if this matter could be listed at the very earliest date.

Yours faithfully

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Chongie Entertainment - Little Vegas, 17 High Road, Wood Green, London, N22 6BH

Conditions Offered

1. That the operating hours for opening will be 08:00 to 23:00 hours Monday to Sunday, including bank holidays.
2. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
 - a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
 - b) The areas of the premises to which the public have access (excluding toilets)
 - c) Gaming machines and the counter area
3. The CCTV shall continue to record activities 24 hours a day for 31 days.
4. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
5. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
6. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.
Children and Young People
7. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the Police or Licensing Authority forthwith on request.
8. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
9. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
10. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
Entrances and Doors
11. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.
Staffing levels.
12. There will be a minimum of 2 staff present at all times when the premises is open after 19.00 or at other times after a risk assessment deems that necessary.
Identification of Offenders or Problem Persons
13. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.
Alarms
15. The licensee shall install and maintain an intruder alarm on the premises.
16. The premises shall install and maintain a panic button behind the cashiers counter.
Toilets
17. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks.
Signage, Promotional Material and Notices
18. Prominent GamCare documentation will be displayed at the premises.

Staff Training

19. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.
20. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or Licensing Authority upon request.
21. New and seasonal staff must attend induction training and receive refresher training every six months.

Homeless and Street Drinking

22. The Licensee shall monitor the area immediately outside the premises which will be covered by the CCTV system. Homeless people and street drinkers will not be permitted to enter the premises.
23. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

24. An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;
 - a) All crimes reported to the venue;
 - b) Any complaints received regarding crime and disorder;
 - c) Any incidents of disorder;
 - d) Any faults in the CCTV system; and
 - e) Any visit by a relevant authority or emergency service.

ATMs

25. There shall be no cash point or ATM facilities on the premises.



CHONGIE ENTERTAINMENT LIMITED
ADVERTISING AND MEDIA POLICY

1. INTRODUCTION
2. UK ADVERTISING CODES
3. CHILDREN AND YOUNG PERSONS
4. IRRESPONSIBLE APPEAL
5. GAMBLING PROBLEM BEHAVIOUR
6. MISLEADINGNESS
7. SELF-EXCLUSIONS & SUBSCRIPTIONS
8. MONITORING THE POLICY



1. INTRODUCTION

Chongie Entertainment Limited is committed to complying with the requirements of all advertising regulations applicable within any jurisdiction it operates in and recognises the importance of honest and socially responsible marketing. It is imperative that Chongie Entertainment Limited acts responsibly and honestly when creating and executing marketing campaigns.

This Policy outlines the principles upon which Chongie Entertainment Limited will manage marketing campaigns in order to safeguard its business and to ensure the protection of young or vulnerable people.

2. UK ADVERTISING CODES

The Codes set out five key advertising principles which must be adhered to by Chongie Entertainment Limited in relation to the management of all advertising.

The general principles of the Codes are that advertising should be:

1. legal, decent, honest and truthful
4. prepared with a sense of responsibility to consumers and to society
5. respectful to the principles of fair competition generally accepted in business
4. not intended to bring advertising into disrepute

The Codes require all gambling advertising to be socially responsible and Chongie Entertainment Limited will ensure it respects the need to protect children, young persons and other Vulnerable Persons from being harmed or exploited by advertising that features or promotes gambling. Although 'vulnerable' person is not defined in the Gambling Act, the ASA will look at factors such as mental, social or emotional immaturity, impaired judgement, for example, because of alcohol or drug addiction, or those who are at risk of gambling more than they can afford to or want to. Nothing in Adverts should condone or encourage criminal or anti-social behaviour.

This means Chongie Entertainment Limited must:

- Be socially responsible, with particular regard to the need to protect Children, Young Persons and other Vulnerable Persons.

Chongie Entertainment Limited must not:

- Portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm;
- Condone or encourage criminal or anti-social behaviour.

A breach of the more specific principles of the Codes will often involve a breach of the social responsibility rules. Adverts that have been investigated under the social responsibility rules have included: portraying gambling as a possible solution to financial concerns and debt; linking gambling

and alcohol consumption; and showing problem-gambling behaviours, such as solitary gambling or gambling taking priority in life.

Chongie Entertainment Limited's Policy sets out the rules and guidance for advertising and marketing. It is important that all employees, contractors, agents, consultants, partners or other parties working on behalf of Chongie Entertainment Limited are aware of and understand Chongie Entertainment Limited's Policy. Advertising or media campaigns must not be initiated without prior approval from Senior Management.

3 CHILDREN AND YOUNG PERSONS

The Codes require marketing communications for gambling products to be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

This means Chongie Entertainment Limited must:

- Be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

Chongie Entertainment Limited must not:

- Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of Children, Young Persons or other Vulnerable Persons;
- Suggest peer pressure to gamble or disparage abstention;
- Suggest gambling is a rite of passage;
- Create marketing or advertising likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture;
- Create marketing or advertising directed at those aged below 18 years through the selection of media or context in which they appear;
- Include a child or a young person in marketing or advertising. No-one who is or seems to be under-25 years old may be featured gambling. No-one may behave in an adolescent, juvenile or loutish way.

No advertising should be based around individuals who are or seem to be under 25 years old (18-24 years old).

An advertisement featuring a character that particularly appeals to children is likely to fall foul of the rules. The use of cartoons or licensed characters, such as super heroes and celebrities popular with children, must be used with a due sense of responsibility. In other words, care should be taken when using cartoon-like images; they might be acceptable if they are adult in nature but run the risk of appealing to under-18s if cartoon images are too childish in their execution; and that might be a problem when advertising gambling products. In all cases, steps should be taken to prevent under-18s from viewing ads and the likely age of the audience viewing the ad should always be considered.

4 IRRESPONSIBLE APPEAL

Chongie Entertainment Limited recognises that irresponsible advertising and marketing related to gambling may appeal to Children, Young Persons or Vulnerable People and create a certain level of attractiveness to gambling. Chongie Entertainment Limited must ensure that all advertising and marketing is created responsibly and as such the below rules and codes must be applied when considering any marketing or advertising campaigns.

Seduction, sexual success and enhanced attractiveness

There must not be any direct or implied link between gambling, seduction, sexual success or enhanced attractiveness through any marketing or advertising.

The CAP & BCAP Codes state:

Marketing communications must not:

- Link gambling to seduction, sexual success or enhanced attractiveness.

It is acceptable to feature attractive people in advertising, as long as the ad as a whole does not link gambling with seduction, sexual success or enhanced attractiveness. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and enhanced attractiveness. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in enhanced attractiveness and an improvement in self-image, thereby breaching the rules.

Toughness, resilience and recklessness

The CAP & BCAP Codes state:

Marketing communications must not:

- Portray gambling in a context of toughness or link it to resilience or recklessness.

No advert or marketing campaign should be created without considering if the context as a whole might create a link between gambling and resilience or toughness, or portraying gambling in a context of toughness.

Enhancing personal qualities

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration.

Again, it is acceptable to feature attractive or admired people in advertising, as long as the ad as a whole does not link gambling with these qualities. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and improved self-image or self-esteem. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in an improvement in self-image, thereby breaching the rules.

Cultural beliefs or traditions about gambling or luck

The CAP & BCAP Codes state:

Marketing communications must not:

- Exploit cultural beliefs or traditions about gambling or luck.

Advertisements should avoid the use of cultural symbols and systems such as horoscopes if those symbols relate to an existing, strongly and communally held belief. These rules are not intended to prevent references to symbols or obsolete superstitions that are unlikely to be taken seriously, such as a clover leaf.

5 PROBLEM GAMBLING BEHAVIOUR

Taking priority and solving problems

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression;
- Suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security;
- Portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments;
- Condone or feature gambling in a working environment. An exception exists for licensed gambling premises.

No marketing activity suggesting that gambling is a solution to financial concerns should be implemented by Chongie Entertainment Limited. Chongie Entertainment Limited views this as socially irresponsible and a breach of this Policy.

Even where risks are clearly set out, care and consideration should always be given to ensure gambling is not portrayed as a viable alternative to employment, or solution to financial concerns in any given context.

References to salary or debts in gambling should also be given specific consideration when planning any marketing or advertising campaign, to ensure there is no breach of the Codes or rules outlined in this Policy.

It is generally acceptable to show gambling as being important and interesting to characters, as long as it is not to the exclusion of other activities or interactions with people.

Solitary gambling

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that solitary gambling is preferable to social gambling.

Any advertisement that features an adult losing track of time, retreating into private fantasy or engaging in secretive gambling is likely to breach the general principle of the Codes that advertisements should not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.

Solitary gambling should not be shown favourably contrasting with social gambling.

6 MISLEADINGNESS

All marketing communications and advertisements must state significant limitations and qualifications. Qualifications may clarify but must not contradict the claims that they qualify and should be presented clearly.

The terms “free”, “gratis”, “without charge” or similar should not be used unless the customer will not pay anything except the unavoidable cost of responding, collecting or paying for delivery of an item.

All marketing communications and advertising must make clear the extent of the commitment the consumer must make to take advantage of a “free” offer.

Chongie Entertainment Limited should ensure:

- Marketing communications or advertisements must not materially mislead or be likely to do so; and
- Marketing communications or advertisements must not mislead the consumer by omitting material information. They must not mislead by hiding material information or presenting it in an unclear, unintelligible, ambiguous or untimely manner.

Material information is information that the consumer needs in context to make informed decisions in relation to a product and to help them decide whether or how to buy a product or service. Whether the omission or presentation of material information is likely to mislead the consumer depends on the context, the medium and, if the medium of the marketing communication or advertisement is constrained by time or space, Chongie Entertainment Limited must take all measures possible to make that information available to the consumer by other means.

Marketing communications or advertisements that include a promotion and are significantly limited by time or space must include as much information about significant conditions as practicable and must direct consumers clearly to an easily accessible alternative source where all the significant conditions of the promotion are prominently stated. Participants should be able to retain those conditions or easily access them throughout the promotion.

The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Any and all marketing and promotions must be approved by a senior manager relevant to the site and must be compliant with this policy.

7 SELF-EXCLUSIONS & SUBSCRIPTIONS

Chongie Entertainment Limited is committed to complying with the requirements of the Act and LCCP, and recognises the importance of respecting our customer's rights and freedoms. Chongie Entertainment Limited therefore ensures adherence to the following:

Chongie Entertainment Limited must take steps to remove the name and details of a self-excluded individual or any customer that unsubscribes from marketing communications from any marketing databases used by Chongie Entertainment Limited or group (or otherwise flag that person as an individual to whom marketing material must not be sent), as soon as practicable after receiving relevant notification.

8 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of this Advertising and Media policy tailoring it to and any training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any advertising or media cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.



CHONGIE ENTERTAINMENT LIMITED
CCTV POLICY



1. INTRODUCTION

Chongie Entertainment Limited understands the importance of CCTV. CCTV is an essential tool in the prevention of crime and assisting in capturing those who have broken the law. Adult Gaming Centres are a business in which cash is continuously being transferred between staff, customer and machines. It is therefore extremely important that CCTV is in action.

2. CCTV SYSTEM

The CCTV system must be switched on and be recording at all times. The CCTV should cover the front and rear exits, all machines and the shop floor as well as the offices and back of house. No decorations or signage should block the view of the CCTV

Any adjustments to the positioning of CCTV must only be carried out by senior management.

There will be a TV monitor positioned in the entranceway to the premises so that customers can clearly see there is CCTV in operation. Another monitor will be placed in the staff room.

3. MONITORING THE SYSTEM

The CCTV must be checked daily to ensure it is in correct working order. Any faults must be communicated to senior management immediately. No information regarding the CCTV should be disclosed to third parties other than the appropriate authorities.

4. ACCESS

The CCTV must be kept in a locked security cabinet, only accessible by senior management. Only senior management must have knowledge of any account passwords.

A hard copy of the CCTV will be kept in a locked cabinet in the staff room at premises, only accessible by senior management. The same will also be stored in the cloud.

5. DATA PROTECTION

Chongie Entertainment Ltd will comply with all appropriate General Data Protection Regulations prevailing at the time.

The logo for Little Vegas, featuring the words "LITTLE VEGAS" in a bold, yellow, sans-serif font. Below the text is a horizontal line of yellow dots. The entire logo is set against a solid red rectangular background.

CHONGIE ENTERTAINMENT LIMITED

CUSTOMER DUE DILIGENCE AND “KNOW YOUR CUSTOMER” PROCEDURES

The logo for Little Vegas, featuring the words "LITTLE VEGAS" in a bold, yellow, sans-serif font. Below the text is a horizontal line of yellow dots. The entire logo is set against a solid red rectangular background.

1. INTRODUCTION

All gambling businesses are subject to the Proceeds of Crime Act (POCA) and have a responsibility to keep crime, including money-laundering, out of gambling. This procedure is supplementary to the Proceeds of Crime and Anti Money Laundering Policy (POCAML) and the Compliance Pack.

2. POTENTIAL RISKS

There are a number of potential risks which may be posed by a customer and it is vital that staff identify whether they need to carry out a Customer Interaction (as outlined in the Compliance Pack) in order to carry out due diligence checks. This is compounded if it is known or suspected that the customer may launder money.

Suspicious behaviour is covered in the POCAML and staff must exercise caution if they are suspicious of a customer.

Possible suspicious behaviour may include the use of stained or forged bank notes; the feeding of notes into TiTo machines and cashing out before playing; feeding large numbers of notes into change machines or refusing to provide personal details such as their name.

3. CUSTOMER DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between venues and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

The basic due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months

This must be recorded in the Customer Interaction spreadsheet.

Staff must be aware that an interaction may have already taken place with a customer which will have been recorded, for example in the Challenge 25 register.

4. ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between venues and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

A customer may require enhanced due diligence if they meet any of the thresholds deemed appropriate for that venue, or if a member of staff, having consulted with senior management, deems it appropriate in the circumstances.

This must be recorded in the Customer Interaction spreadsheet.

The logo for Little Vegas, featuring the words "LITTLE VEGAS" in a bold, yellow, sans-serif font. The text is set against a solid red rectangular background. Below the word "VEGAS", there is a horizontal line of small yellow dots.

Staff must ensure they also consider the behaviour of established customers when deciding when enhanced due diligence may be appropriate.

In the event there is increasing level of suspicion of money laundering, or even actual knowledge of money laundering, senior management must be alerted immediately and a decision made on a case by case basis whether or not the customer may be allowed to continue gambling, whether the MLRO must be notified or whether any other action is to be taken. The MLRO will then decide whether a SAR is appropriate. The MLRO is [REDACTED].

5. RECORDING

All customer due diligence and enhanced due diligence interactions must be recorded in the Customer Interaction spreadsheet.

Further, these interactions must be monitored and reviewed monthly in order to ensure that any patterns emerging are noticed and dealt with if appropriate. This review must be conducted by senior management.

Should the customer refuse to provide the requested documents the business relationship with the customer will be terminated.

6. MONITORING THIS POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of its Customer Due Diligence and "Know Your Customer" procedure, tailoring this procedure and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.



CHONGIE ENTERTAINMENT LIMITED
MACHINE FRAUD POLICY



1. INTRODUCTION

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

2. MONITORING MACHINES

Management will ensure the venue floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. Management will ensure photos of known fraudsters are available to all members of staff.

Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a venue trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.

Chongie Entertainment will subscribe to the BACTA machine fraud alerts and to those alerts provided by machine manufacturers and suppliers.

3. MACHINE RATIO CHECK

Due to the quantity of B3 machines permitted being limited, staff must ensure they check that this is adhered to in all premises.

A machine ratio check must be completed monthly, or in the event any machines are added or removed. This must be conducted by senior management and must be recorded.

LITTLE VEGAS

CHONGIE ENTERTAINMENT LIMITED PROCEEDS OF CRIME & ANTI MONEY LAUNDERING POLICY

- 1 POLICY PURPOSE**
- 2 PROCEEDS OF CRIME (POC) & MONEY LAUNDERING (ML)**
- 3 POCA OFFENCES & PENALTIES**
- 4 KNOWLEDGE OR SUSPICION**
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- 13 PREJUDICING AN INVESTIGATION**
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- 16 TRAINING AND SCREENING**
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1 POLICY PURPOSE

The purpose of this document is to detail the responsibilities of the Company and its staff in relation to the Proceeds of Crime Act 2002 (POCA), Terrorism Act 2000 and to uphold the licensing objective of 'Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime' as outlined within the Gambling Act 2005.

In addition, the contents of the document will outline our Company's policies and procedures to prevent the Company being used in connection with money laundering or terrorist financing as well as our continued compliance with anti-money laundering, counter terrorist financing, licensing and legislative requirements.

Chongie Entertainment Limited is committed to ensuring that all necessary safeguards are in place in regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

2 PROCEEDS OF CRIME & MONEY LAUNDERING

2.1 *Proceeds of Crime*

The Proceeds of Crime can be broadly defined as property from which a person benefits directly or indirectly, by being party to criminal activity - i.e. stolen money, money from drug dealing, tax evasion or stolen, thieved or robbed property. It includes property that a person gains by spending the proceeds of criminal activity, for example, if a person used money gained in a bank robbery to gamble.

2.2 *Money Laundering*

Money Laundering is a term used to describe the practice of converting money that has been unlawfully or criminally obtained into legitimate funds, concealing and disguising the original source of the funds.

2.3 *Differences*

The law does not make any distinction between these two activities. The action we should take, and the penalties for not taking action are the same for both.

3 PROCEEDS OF CRIME ACT (POCA) OFFENCES & PENALTIES

There are 3 key offences under the POCA that are applicable to anyone who knows or suspects that property relates to the Proceeds of Crime:

- Section 327 states that a person commits an offence if they conceal, disguise, convert, or transfer criminal property in the UK.
- Section 328 provides that a person commits an offence if he or she enters into or becomes concerned in an arrangement which he or she knows or suspects facilitates, by whatever

means, the acquisition, retention, use or control of criminal property to or on behalf of another person.

- Section 329 states that a person commits an offence if he or she acquires, uses, or has possession of criminal property.

The above offences can be committed by any person, including employees who have knowledge or suspicion that a customer is using the POC. The penalty upon conviction of these sections is a maximum term of 14 years imprisonment, a fine, or both.

There is a defence available for a person to show that they made an authorised disclosure under sections 338 and 339, either for an employee to report to the Compliance Officer, and further for responsible parties in senior management to assess and report where they believe knowledge or suspicion exists to the National Crime Agency (NCA).

Once a report has been made, the Compliance Officer will consider whether they hold knowledge or suspicion based on the information provided. However, responsible parties in senior management may commit an offence under section 332 if there is a failure to report knowledge or suspicion to the NCA as soon as reasonably practicable after the information has been received. The sanction under POCA is a prison term up to 5 years, a fine, or both.

It is also an offence under section 342 to disclose knowledge of the existence of any investigation prior to or following a report which could prejudice the investigation' (this is often related to as 'tipping off' though this is not to be confused with the actual offence of tipping off which is only an offence in the regulated sector). The penalty upon conviction is a maximum of 5 years imprisonment.

4 KNOWLEDGE OR SUSPICION

Chongie Entertainment Limited and its employees have an obligation to report when we either have knowledge or suspicion that another person is using the POC or engaged in ML.

The POCA regulations do not define knowledge or suspicion, but case law has provided guidance.

Common sense provides that if, for example, a customer confirms they are laundering money or using money from a robbery, the member of staff would in fact know rather than suspect. Courts have previously gone further and also defined knowledge to include situations where the facts would be clear to an honest and reasonable person. It could also include a member of staff turning a blind eye, for example, if staff do not make normal enquiries of a customer where they believe they already know the answer and do not want to hear it.

Suspicion is subjective and may be based on picking up something unusual or where facts do not tally up. Suspicion does not need to be based on actual facts, but there needs to be some satisfaction beyond speculation that the customer is involved in the use of the POC or ML. A feeling of unease does not amount to suspicion.

5 RESPONSIBILITIES

The POCA and AML regime within Chongie Entertainment Limited is managed by the Compliance Officer and supported by senior management.

All staff have a role to play in combatting the use of criminal proceeds and ML, and are trained to pick up triggers which may lead to concern and further suspicion or knowledge.

Staff are also trained to report general concerns or otherwise knowledge or suspicion to the Compliance Officer. Where knowledge or suspicion of money laundering is believed to exist, the Compliance Officer will determine whether a Suspicious Activity Report (SAR) should be raised with the NCA.

6 PRODUCTS & RISK MITIGATION

Chongie Entertainment Limited runs Adult Gaming Centre facilities in the UK.

To identify and manage the risks associated with the above products, Chongie Entertainment Limited applies controls in four broad ways.

RISK TRIGGERS: Training key staff to be aware of risk triggers which may be indicative of ML or the use of POC and how to report concerns.

CUSTOMER MONITORING: Providing facilities to allow Chongie Entertainment Limited to monitor customers, allowing staff to log consumer information, transactions and emerging concerns.

SYSTEM CONTROLS: Implementing controls to mitigate areas of potential risk and highlight potential irregularities.

PROACTIVE ANALYSIS: Carrying out proactive analysis of purchasing activity to help detect unusual activity and risk triggers. This is supported by record keeping, monitoring and customer reviews.

Each is considered in turn below. This policy is supplemented by the Customer Due Diligence and “Know Your Customer” Procedures.

7 RISK TRIGGERS

Considering the above product type, there are different types of activity or customer behaviours which could lead to cause for concern leading to the possible formulation of knowledge or suspicion that an individual is participating in gambling activity with the POC or involved in ML.

These behaviours may be identified by any employee, and are most likely to be recognised by staff working in the Adult Gaming Centres. Full training is carried out on induction and at 12 monthly refreshers. All staff are therefore fully equipped with the skills they need to identify any suspicious behaviour.

8 CUSTOMER MONITORING

Chongie Entertainment Limited will record any concerns they have with its customers by using the data provided for its own internal records. This is detailed in the Compliance Pack

9 SYSTEM CONTROLS

General system controls exist to mitigate the risk of our products and business being used from a POC or ML perspective, and create an environment in which suspicious activity may be effectively detected.

Cash Handling

Location specific operating policies and procedures will be put in place with regards to accounting practices and record keeping, in particular in respect of the following:

- Monetary stakes
- Token transactions
- Customer refunds (due to machine malfunctions)
- Money removed from machines
- Ticket in ticket out functions

This is not an exhaustive list and the risks of each location will be analysed.

The cash at each premises will be collected daily and stored in a safe. The external cash collection will take place every 7-10 days . The Operations Manager will be present for cash collections.

TiTo software will be installed in all machines.

10 PROACTIVE ANALYSIS

The Compliance Officer is aware and completes pro-active analysis of the data recorded to complete the necessary checks for the purposes of POC and ML.

11 SUSPICIOUS ACTIVITY REPORTS (SARs)

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the MLRO or appropriate deputy as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

12 SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Chongie Entertainment Limited understands that SAR reporting and the defence of making a disclosure under section 338 of POCA is not intended to be used repeatedly in respect of the same customer.

Wherever knowledge or suspicion exists, the Compliance Officer will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

13 PREJUDICING AN INVESTIGATION

Staff are trained that subsequent to a report to the Compliance Officer, or a SAR being raised with the NCA, it is a criminal offence under section 342 of POCA to release information about the knowledge of the existence of an investigation that may prejudice that investigation.

The Compliance Officer will work particularly closely with customer facing staff to ensure that investigations are not disclosed when a payment is being held pending consent, or during the process of ceasing the relationship with a customer.

14 ADVERSE INFORMATION & POLICE INVOLVEMENT

14.1 Previous Convictions or Previous Police Involvement

Where information is obtained which indicates previous Police interest or convictions for a financial crime or related offence, a file will be updated and steps may be taken to gather customer information from the stages above. Where concerns remain, the customer may be requested to provide proof of identity and source of funds.

14.2 Current Police Investigation

All Police requests for information are logged and a file is created in respect of customers subject to the enquiry (where a file does not already exist), and information provided.

If Police request information in respect of a financial crime enquiry, contact will be made to understand the current status of the investigation.

Provided that the following criteria are met, and there is no overriding knowledge of laundering activity, Chongie Entertainment Limited will support and formally cooperate with the Police if there is an explicit request to continue business to preserve the case and evidence.

- The Police must submit a Data Protection Act request for information;
- A formal timeframe for engagement must be established with Police;
- Assurances must be provided by Police that there is a formal investigation, and that the case will be subject to regular review dates. RIPA authority (to provide Police with

investigatory and surveillance powers) must be obtained within the first 28 days of engagement;

A Disclosure will be made to the Gambling Commission to advise.

Suspicious Activity Reports will be considered by Chongie Entertainment Limited at the point of Police engagement and at each subsequent Police review date.

This cooperative approach seeks to help to ensure that crime is kept out of gambling in the longer term.

15 INTERNAL RISKS

The internal risks of an Adult Gaming Centre include, but are not limited to, the following:

Money lending

Chongie Entertainment recognises the risks presented by customers who may seek to transfer money to other customers or third parties or receive funds from other customers or third parties. In order to mitigate this risk, identified transfers between customers and third parties must be assessed by senior management who must satisfy themselves that systematic, organised or commercial money lending is not taking place. Staff will be trained on identifying factors to look out for.

Collusion

Collusion can be the agreement between people to act together secretly or illegally in order to deceive or cheat someone. Chongie Entertainment are aware of the risks collusion present to both the premises and in the context of money laundering and proceeds of crime. All staff are trained to be aware of the signs of collusion and to report such signs to management immediately.

Fraud

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

Management will ensure the venue floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. Management will ensure photos of known fraudsters are available to all members of staff. Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a venue trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.

16 TRAINING AND SCREENING

Chongie Entertainment Limited are committed to ensuring that all key staff understand their responsibilities in respect of POCA and this policy, including internal risks, and in particular the triggers

to be alert to and the requirement to report concerns, knowledge, or suspicion to the Compliance Officer immediately.

Staff are trained as follows:

All employees of Chongie Entertainment Limited are required to undertake and complete AML training and understand our policy and reporting processes.

Head Office

Key customer facing head office staff, including the Compliance Officer, are required to understand and adhere to the Company's POCA & AML policy.

Training refreshers will be held every 12 months and new starters are trained upon induction.

Ad hoc training sessions may be provided to react to developing risks in particular areas.

17 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of its POC & ML regime, tailoring this policy and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.



Chongie Entertainment Limited

Social Responsibility & Compliance Pack

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1 Introduction

Chongie Entertainment Limited (“Chongie”) and all of its employees are committed to a safer gambling experience for all customers of Little Vegas.

These policies and procedures are designed to ensure that the Gambling Act 2005, the LCCP and all relevant guidance is understood and followed by all employees of Chongie.

The Social Responsibility & Compliance Pack is in addition to the following:

- The Money Laundering and Proceeds of Crime Policy
- The Customer Due Diligence and “Know Your Customer” Procedure
- The Advertising and Marketing Policy
- The Staff Guard Policy
- The CCTV Policy
- The Machine Fraud and Ratio Check Policy
- The Gambling Risk Assessment

And any other policy which Chongie may implement in order to uphold the Gambling Act 2005 and all additional guidance and legislation.

1.1 The Gambling Act 2005

Mandatory Licence Conditions implemented by the Gambling Act 2005 (“GA05”):

- A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
- There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of ‘direct access’ in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.
- 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 at any gaming machine in order to do so.

- The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.

1.2 The Licensing Objectives

- 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 and
- Protecting children and other vulnerable person from being harmed or exploited by gambling

1.3 The Licensing Conditions and Codes of Practice

The Licence conditions and codes of practice ("LCCP") set out the requirements Chongie must meet in order to hold its operating licence. All senior employees must subscribe to the Gambling Commission news updates and regularly check the website for updates.

Section 24 of the Gambling Act 2005 sets out two types of provisions:

- Social responsibility provisions

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

- Ordinary code provisions

These do not have the status of licence conditions but 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 breach of ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to the imposition of a financial penalty

These codes consist of: Financial Requirements (including Anti Money Laundering); Protection of Children & Vulnerable People; Combating Problem Gambling; Access to Gambling by children and young persons; Information on how to gamble responsibly and help for problem gamblers; Customer Interaction; Self Exclusion; Employment of Children & Young Persons;

Money lending between customers; Fair & Open provisions; Marketing; Complaints & Disputes; Gambling Licensees' staff; Information Requirements; Primary Gambling Activity

Adult Gaming Centres must comply with the relevant sections of the LCCP and all members of staff must be familiar with, and are trained on, these sections.

1.4 The Powers of the Gambling Commission and others

Members of staff are to co-operate at all times with the Commission's Compliance officers, Local Authority Licensing officers and the police in the proper performance of their compliance functions.

These individuals rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2.

Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

2 Social Responsibility

2.1 Promotion of Socially Responsible Gambling

The third objective of the Gambling Act is to protect children and other vulnerable persons from being harmed or exploited by gambling and it is conditional on our Adult Gaming Centre licence that we have appropriate controls in place. The need to prevent young and vulnerable persons from being able to access our products and services is of paramount importance to Chongie.

2.2 Problem Gambling and the Provision of Information

Chongie monitors customer activity and uses a range of indicators to identify potential gambling. These include:

- Time and spend indicators: amount and frequency of time and deposits, time of day, large losses.
- Customer contact: information or hints from customers, frequent complaints, or signs of distress.
- Play indicators: chasing losses, erratic gaming patterns and product choice.
- A 'big win': high staking following a win could hide or even lead to harmful behaviour.

A player may give some signals that they have a gambling problem while communicating with members of staff. A problem gambler may display some of the following signs:

- Finding it hard to manage or stop gambling – customer may make a comment regarding this.
- Signs of agitation, distress or aggression: Customers may target aggression at customer support staff following a loss. Staff will be trained on how to deal with aggressive customers and how to diffuse situations.
- Player informs staff member that their main goal is to win a specific amount of money at which point they will leave.
- Customer contacts Chongie management regularly to express dissatisfaction with gaming outcomes and overall gameplay.

In the event that a suspected problem gambler enters an AGC and wishes to participate in gambling:

- The customer must be tactfully referred to GamCare by the appropriate member of staff.

- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communication between staff and suspected problem gamblers must be monitored and approved by senior management.

In the event that an existing customer is suspected of becoming a problem gambler:

-
- The customer must be tactfully referred to GamCare, by the appropriate member of staff.
- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communications between staff and the suspected problem gambler should be monitored and approved by senior management.

Chongie clearly displays posters and provides leaflets for customers which detail key organisations which can help, including Gamcare.

The following organisations also provide psychological help, professional advice and assistance in dealing with gambling addiction:

- Counselling Directory
- The National Council on Problem Gambling
- GamCare
- Gamblers Anonymous
- Gam-Anon UK and Ireland
- Y-Gam

2.3 Customer Interaction

Chongie recognises its responsibilities 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 3.4.1.

Chongie follows the Identify- Interact- Evaluate framework to ensure compliance and to protect its customers.

Chongie, where circumstances allow and subject to player confidentiality, shares experience and deliver good practice across the full range of social responsibility requirements for customer interaction with other operators.

Identify

Chongie ensures that staff have access to all relevant sources of information and policies to ensure effective decision making, in order to guide and deliver effective customer interactions, including information to assist in identifying at risk customers whom;

- may not be displaying obvious signs of, or overt behaviour associated with, problem gambling
- are designated as 'high value', 'VIP' or equivalent (although Chongie do not operate a VIP scheme)
- are demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction

Chongie Entertainment Limited recognises the importance to identify any customers where there may be problems early and pro-actively reach out and offer support.

Interact

Should a staff member feel that a player's behaviour may indicate problem gambling, they should engage with the customer by asking questions such as:

- Do you feel that your gambling spends are controlled?
- Do you acknowledge that your activity may result in losses and can withstand these losses?
- When you lose, do you feel you the need to return as soon as possible to win back your losses?
- Do you ever borrow to finance your gambling?

The member of staff, if they think it necessary, will explain the various management tools in place such as self-exclusion, and will provide information on GamCare.

Evaluate

Chongie understands that evaluation of customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The result of a customer interaction may be that the customer is allowed to continue, the customer self-excludes or uses a different tool, or the customer is barred.

A monthly review of customer interactions should be carried out with considerations to the following points:

- Did the customer start using gambling management tools?
- Did the customer read the responsible gambling information?
- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?

Chongie keeps a record of customer interactions, and where an interaction has been ruled out, the reasons for this.

A flow chart of how Customer Interaction works is at section 8.3.

2.4 Self-Exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. Chongie offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want assistance to help them stop.

Chongie takes all reasonable steps to ensure that customers on the self-exclusion register are prevented from entering the premises. Whilst on the self-exclusion register, customers also have certain obligations contained in the terms and conditions that they acknowledge when joining the self-exclusion program.

What happens

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.

- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months.
- Chongie will not allow the excluder admittance to the premises during the term of the self-exclusion agreement.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave.
- Members of staff must be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by Chongie without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.

Chongie will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our 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.

A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

Those self-excluded are removed from any marketing databases held by Chongie within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.

At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again. At the end of the exclusion period, the Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.

Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.

Chongie retains self-exclusion records for the length of the agreement plus a further 6

months.

3 Children and Vulnerable Persons

3.1 Access to Gambling

Chongie implements age verification procedures that use various methods to try and detect and deter children and young people from entering including U18 signage.

The premises themselves have been designed to ensure staff on the floor can see who is accessing the premises and floor staff must be vigilant. Specific risks have been considered in the Local Area Risk Assessment.

3.2 Challenge 25

Chongie operates a challenge 25 policy which requires that all customers who appear to be under 25 are approached by a member of staff and their age verified by the production of the appropriate valid ID document as soon as entering the premises or as soon as possible thereafter but BEFORE gambling.

Acceptable forms of documentation include:

- Any ID carrying the PASS logo (e.g. Citizen Card, Connexions Card) Full Driving Licence with photo card.
- Provisional Driving Licence with photo card or International Passport
- Military Identification Card

The staff must check to see that the ID is acceptable and then record the interaction in the ID Record.

If suitable photographic ID cannot be produced, then the customer should be politely requested to leave the premises with the incident subsequently recorded.

Challenge 25 signage is positioned on or close to the entrance/exit door and displayed in conjunction with existing signage.

The Gambling Commission and Local Licensing Authority may conduct underage test entries to assess whether or not Chongie's Adult Gaming Centre's are allowing under- 18's to enter or gamble on the premises. BACTA also conduct age verification checks.

If at any time staff are informed that they have been the subject of an underage test by the Gambling Commission and/or the Local Licensing Authority, this is immediately reported to the Operations Manager and Compliance Officer.

All age verification test failures are fully investigated by the Operations Manager and/or the Compliance Officer. Performance is constantly monitored and further training may be given to staff if necessary to react to developing risks in particular areas.

Chongie does not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

If a person over the age of 18 knowingly allows a child under the age of 18 in to the Adult Gaming Centre that person and the child will be banned for 6 months (the names and details will be recorded on a written form which will be filed at the unit).

This should be reported to the Premises Manager for that site, who will then complete the "ban log" and report and retain for future use/inspection.

If an employee of Chongie becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, they shall ensure that:

- Any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person is returned as soon as is reasonably practicable; and
- Any prize must not be given to the child or young person.

This should be reported to the Premises Manager for that site, who will then complete the ban log and report to the Operations Manager in writing.

Any member of staff who knowingly allows access to a person under the age of 18 will be subject to disciplinary action.

3.3 Employment of Children and Young Persons

Licensees who employ children and young persons should be aware that it is an offence: -

- a) to employ them to provide gambling facilities in an Adult Gaming Centre
- b) for their contract of employment to require them or permit them to perform functions in respect any gambling machine in an Adult Gaming Centre
- c) to employ a child to perform any function in an Adult Gaming Centre where facilities are being provided to play gaming machines

Chongie will not employ and person under the age of 18 years

4 Crime and Disorder

4.1 Money Laundering and Proceeds of Crime

Chongie maintains a separate ML and POCA policy which is available to all staff.

4.2 Suspicious Activity Reports

All employees are aware of where the SAR forms are located, how to complete them and how to submit them to the Operations Manager.

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the Operations Manager as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Wherever knowledge or suspicion exists, the Operations Manager will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

Further information is contained in the ML and POCA policy.

4.3 Cash Handling

All members of relevant staff are trained specifically on cash handling and in particular with regard to security, accounting practices and record keeping in respect of:

- (i) Monetary stakes introduced to machines (gross takings),
- (ii) Money introduced to re-float machines
- (iii) Token transactions
- (iv) Customer refunds due to machine malfunctions.

(v) Money removed from machines (net takings)

Sign Off Keys

No keys are to be handed to anybody without checking ID. The person who hands over the keys will be held responsible. All visiting engineers need to sign in.

Cash Collection

Cash is collected daily and stored in a safe. The external cash collection will take place every 7-10 days and the Operations Manager will be present.

Empty of Machines

The empty of machines needs to be carried out ideally when there are no customers in the unit.

Once each machine/terminal has been emptied/re-floated the keys need to be locked away again in the safe.

Cash Reconciliation

The Premises Manager is responsible for this and any discrepancies / variances will be recorded as cash losses and investigated as necessary.

All accounting procedures will be recorded by senior management.

4.4 Keeping Alcohol Out

Chongie implements clear rules and guidelines on the consumption and influence of alcohol.

Individuals under the influence of alcohol on entry

- In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.
- When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.
- Should the individual resist or refrain from leaving the premises in the first instance a Premises 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 staff on duty the police should be called to assist.
- All incidents should be recorded fully on the premises log.

Alcohol consumption on site

- Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

4.5 Dealing with Aggressive Customers

Violence and aggression are used to show distress and dominance. Whilst there are some individuals for whom such behaviour is normal, members of staff must be extremely cautious of treating such behaviour as normal.

Staff must be aware of any signs of aggression including, but not limited to:

- Tensed muscles or sweating
- Twitching muscles, particularly in the face
- Pacing
- Changes in voice (pitch, volume)
- Language, obscenities, threats
- Facial expression
- Withdrawn or upset
- Carrying a weapon or suspected weapon

In the event a member of staff comes across a customer displaying signs of aggression or violence they should:

- Listen to the customers views or complaints
- Try to understand what their problem is and discuss it with them
- See if they can resolve the situation by taking any actions needed

Staff should be cautious in their approach and ensure they do not adopt a confrontational approach and are aware of how they can contact another member of staff if necessary.

5 Fair and Open

5.1 General Terms and Conditions

Chongie utilise and comply with BACTAs general Terms and Conditions and all relevant sections of the LCCP

5.2 Complaints Procedure

Chongie Entertainment Limited is committed to providing excellent levels of service and are constantly striving to meet the expectations of customers, and welcome feedback where services can be improved or where expectations have not been met.

Issues of concern can usually be resolved by discussing the matter with a member of the team within one of the Adult Gaming Centres. A database record will be completed at the time of the contact, detailing your contact details, which team member dealt with the issue, the nature of the complaint and how the complaint was resolved. A copy of this complaints procedure will be provided to customers upon request, or whenever they make a complaint.

However, we recognise that sometimes it may not be appropriate to contact us in this way, or you may feel your concerns have not been properly addressed internally after talking to the team. Where this is the case, we actively encourage our customers to use our Complaints Procedure so that issues and concerns can be raised with management and addressed appropriately. This document explains how the Complaints Procedure works, what you need to do and what you can expect.

There are two levels – Complaints Co-ordinator and Lead Contact of the Adult Gaming Centre.

Level 1 – Complaints Co-Ordinator

If Chongie Entertainment Limited haven't reasonably met your expectations or you wish to make a complaint relating to services you should write or e-mail in the first instance to the Complaints Co-ordinator, who will be the General Manager of the premises

Please put in the subject line 'FAO: Complaints Co-ordinator'.

In expressing concerns it is helpful to include all relevant details such as nature of complaint, date, people contacted and the other circumstances relating to your complaint. This helps to quickly and fully understand the nature of the complaint and begin investigations. Once the Complaints Co-ordinator acknowledges receipt of your letter or email in writing within 48 hours, he will also provide a copy of this complaints policy. You can normally expect a full written response within 10 working days of this acknowledgement. His aim is to resolve the complaint to your complete satisfaction at this level.

Level 2 - Lead contact of the Adult Gaming Centre.

If, after receiving our response at the 1st level you feel that your concerns have not been fully addressed you can ask for your complaint to be referred to the lead contact in relation to the services provided. Please contact Dobromir Baltadzhiev. You can normally expect a full written response to your complaint within 10 working days of acknowledgement of the complaint reaching the 2nd level.

It may be necessary for additional information to be sought from an external source. When this is necessary, it may not be possible to respond to your complaint within 10 working days and the Lead contact of the Adult Gaming Centre will contact you again. He will explain the reasons for asking for a time extension and seek your approval.

Chongie Entertainment Limited understand the need for ADR provisions to be in place and therefore intend to contract with a Gambling Commission approved ADR provider.

5.3 Marketing and Promotional guidelines

Chongie has an Advertising and Media Policy which is available to all staff.

Chongie's marketing team ensures that promotional material is developed in a socially responsible manner, particularly to protect young or vulnerable persons from being harmed or exploited by advertising and in accordance with the following provisions:

- The Gambling Commission's LCCP;
- Committee of Advertising Practice (CAP) code.

6 Recording and Reporting Requirements

6.1 General Reporting Requirements

Chongie acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 of the Gambling Act 2005 and that:

- they must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions 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 of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- Chongie must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (i) the numbers of people making use of the facilities and the frequency of such use;
 - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- Chongie must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

6.2 Challenge 25 Register

	Name and other details	Date of Challenge	Signed	Print Name	Any other comments
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

6.3 Self-Exclusion Register

	Name and other details	Date of exclusion	Expiry of Ban	Signed	Print Name	Breaches of self exclusion by self excluded member	Date of when self excluded has opted and declared to return to gambling
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

6.4 Customer Interaction

	Name and other details	Date	Observation	Action	Outcome	Signed	Print Name
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

6.5 SARS Register

	Form Name	Date of Form	Submitted	Signed	Print Name	Any other comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

6.6 Staff Training

	Staff Name	Date of Training	Trainer	Training covered	Signed	Print Name	Any other comments
1							
2							
3							
4							
5							
6							
7							
8							

9							
10							

6.7 Incidents Requiring Police Attendance

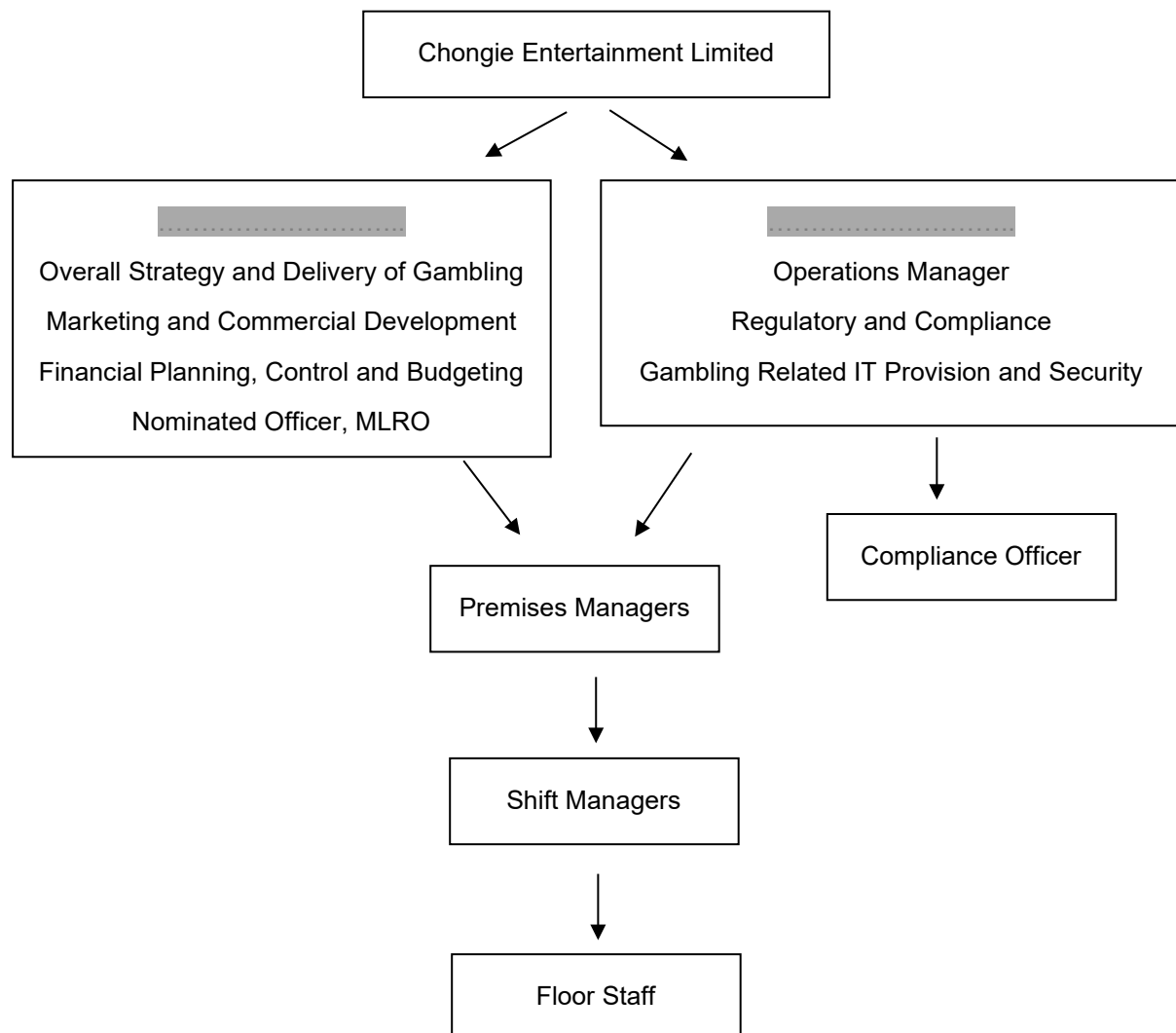
	Date of Incident	Description of Incident	Police attendance?	Signed	Print Name	Any other comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

7 Training

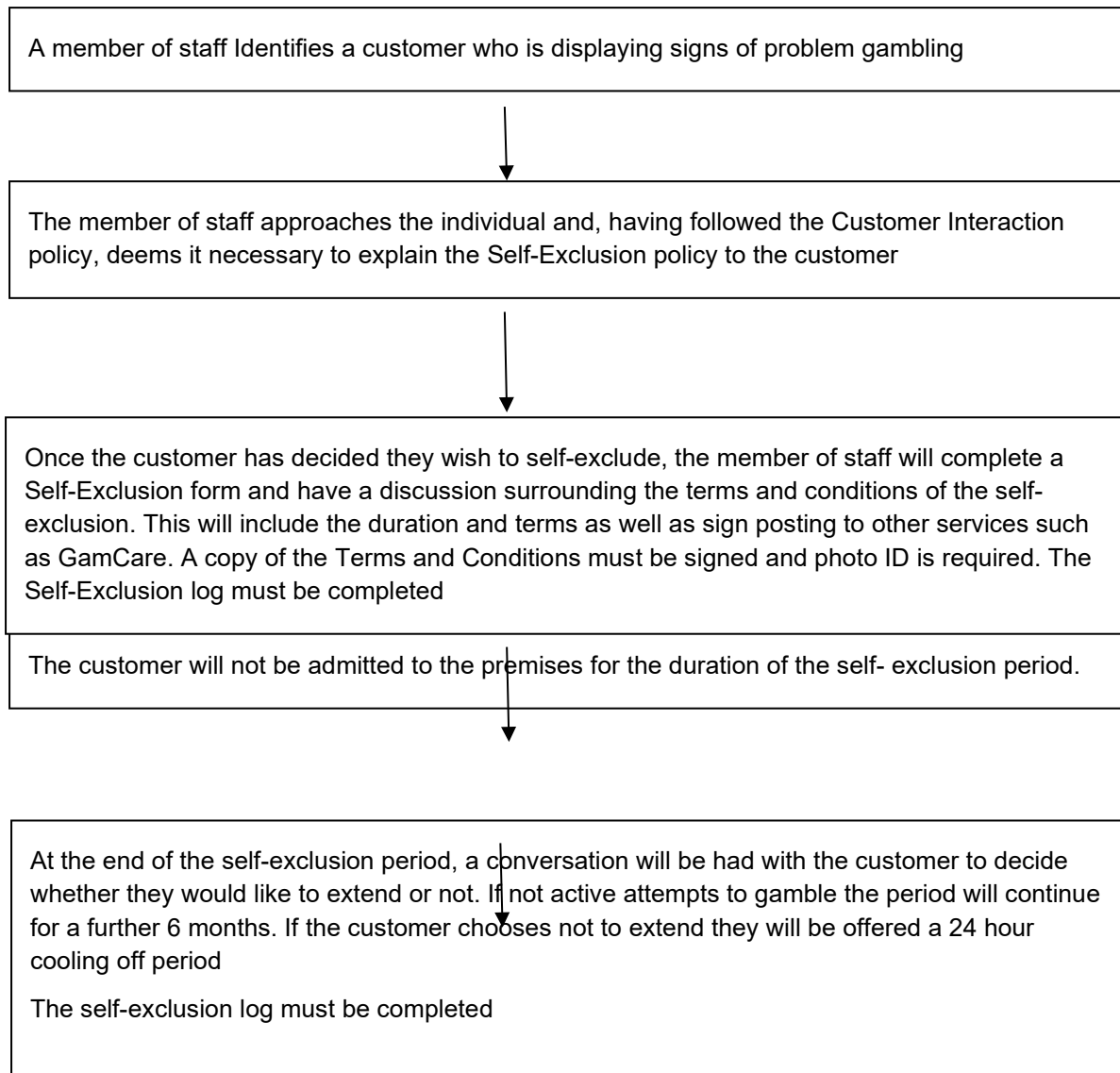
- 7.1 All members of staff receive full training on the Compliance Pack and all other Policies and Procedures of Chongie.
- 7.2 All members of staff will complete training on starting and at annual refreshers.
- 7.3 All training will be recorded in the training Record.
- 7.4 Training is carried out by the Dobormir Baltadzhiev, Operations Manager or an external Consultant.

8 Appendices

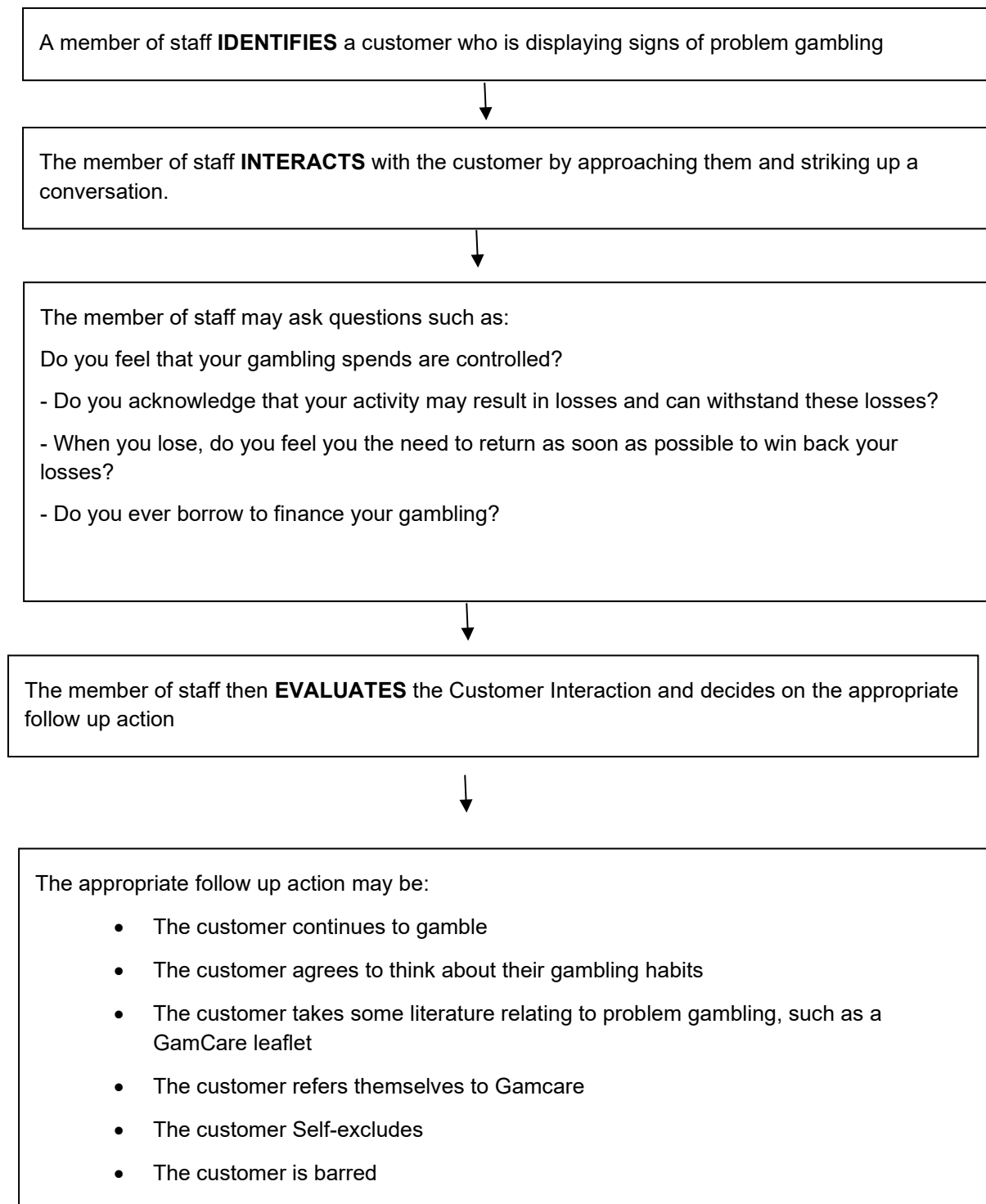
8.1 Management



8.2 Self-Exclusion Flow Chart



8.3 Customer Interaction Flow Chart



9 Monitoring

To ensure that the policies and procedures continues to be fit for purpose:

Chongie are committed to carrying out an ongoing risk assessment of its policies and procedures, tailoring them to and any training around new products and newly identified risks as appropriate.

This policy is subject to review following any new guidance published by the Gambling Commission.

Reviewed By	Reviewed On	Next Review



CHONGIE ENTERTAINMENT LIMITED
STAFF ALARM POLICY



1. INTRODUCTION

Chongie Entertainment Limited is committed to protecting its employees from any harm. All employees in the Adult Gaming Centres are therefore provided with personal alarm systems and the panic alarm system is installed. This system helps to deter aggressive or anti-social behaviour as well as provides staff with a way of getting help when they need it.

2. STAFF ALARM FOBS

Staff must carry their staff alarm fobs at all times when working. This increases their security, as well as the security of customers and anyone else in the premises.

Staff can also take comfort and confidence knowing they are carrying their staff alarm fob and can call for assistance if and when needed.

The staff alarm fob notifies Senior Management of a potential or actual problem.

3. USING STAFF ALARM FOBS

Staff alarm fobs should be prioritised over the panic alarm button in situations which do not require urgent police assistance. Staff alarm fobs should be activated whenever members of staff need help. Staff must be confident to use their staff alarm fobs whenever they feel it necessary, they must not be hesitant to use them.

Staff alarm fobs should only be used when it is safe to do so, members of staff must not endanger themselves.

All staff members are trained on how to use their staff alarm fob.

4. USING PANIC ALARMS BUTTON

The panic alarm buttons must be used when a member of staff would usually call for police assistance, for example in the face of physical violence, the threat of physical violence or a robbery. This system is linked directly to the police and must be respected.

Panic alarm buttons should only be used when it is safe to do so, members of staff must not endanger themselves.

All staff members are trained on how to use the panic alarm button.

5. TESTING

Staff alarm fobs and panic alarm buttons must be tested monthly.

All staff members are trained on how to test their alarms.