





GAME NATION

SLOTS CLUB
+ LOUNGE

448

233

BI
GRAFFITI

SLOTS CLUB
+ LOUNGE

SLOTS CLUB
+ LOUNGE





GAME NATION



SLOTS CLUB
+ LOUNGE

Welcome

THINK 28

WE ARE OPEN

MON - SAT

18+

GAME NATION

G ★

DIAMOND

7

7

DIAMOND

PARTY SPECIAL

7 CLUB

PRIZE

2500

1000

Stay Safe

WE ARE OPEN

SECURITY NOTICE

GAME NATION

NEW SLOTS ON T

bloo

OPENS 1

448 HIGH ROAD, T

GAME NATION

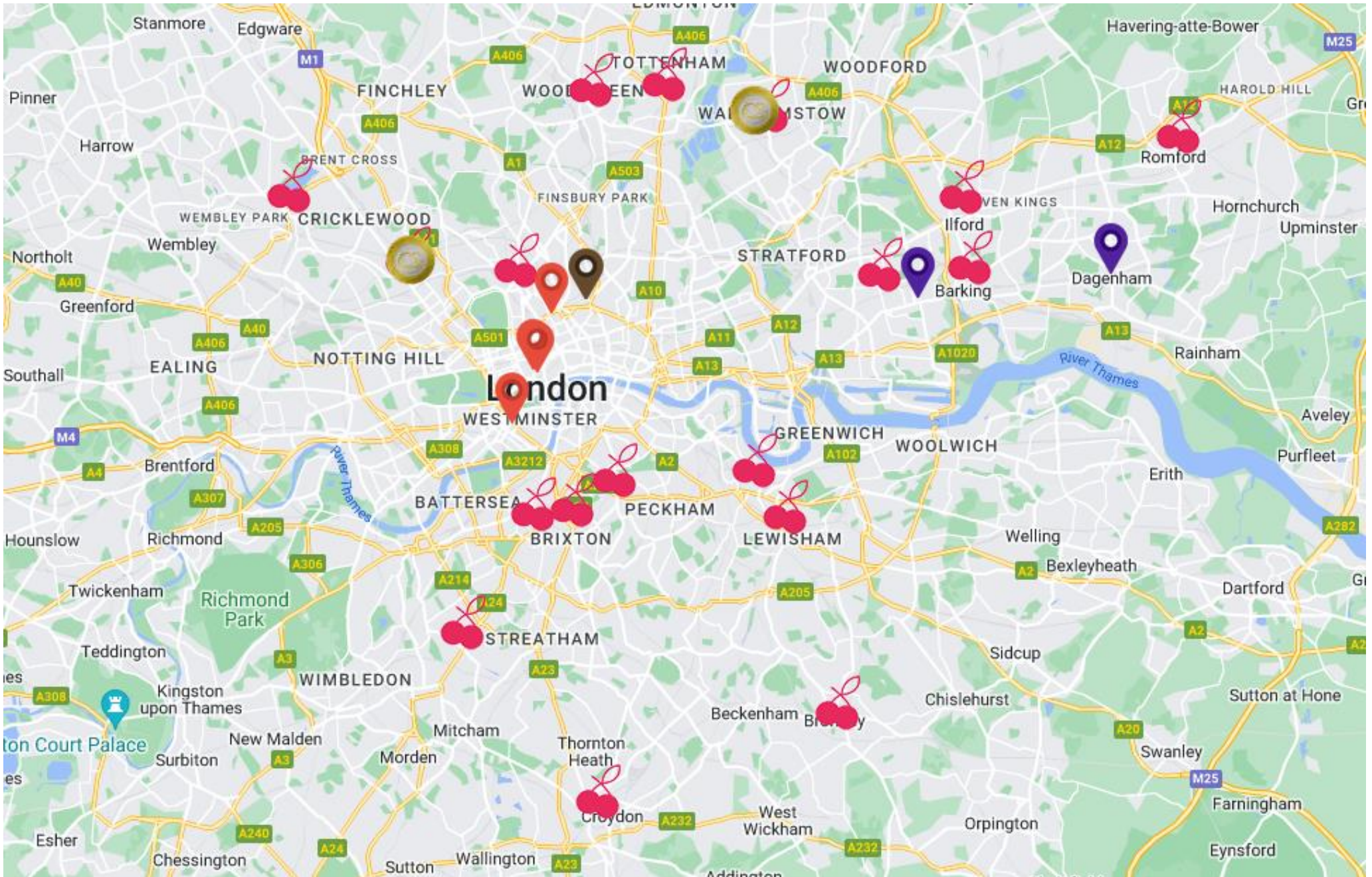






City Gaming premises located in the Index of Multiple Deprivation Top Decile

Venue Name	Address	LSOA code (2011)	LSOA name (2011)	Local Authority District code (2019)	Local Authority District name (2019)	Index of Multiple Deprivation (IMD) Rank	Index of Multiple Deprivation (IMD) Decile	Licensed Hours	Operational Hours	Additional Licence Conditions
Margate	90 High Street, Margate, CT9 1JW	E01024676	Thanet 003A	E07000114	Thanet	67	1	24 Hours	24 Hours Mon-Sun	No
Firth Park	9-11 Sicey Avenue, Sheffield, S5 6NF	E01008062	Sheffield 013E	E08000019	Sheffield	1138	1	24 Hours	9am-8pm Mon-Sun	No
Ipswich	37 Upper Brook Street, Ipswich, IP4 1ED	E01033129	Ipswich 007H	E07000202	Ipswich	1620	1	24 Hours	24 Hours Mon-Sun	No
Shirley	71 High Street, Shirley, Southampton, SO15 3NP	E01017250	Southampton 010B	E06000045	Southampton	1669	1	24 Hours	24 Hours Mon-Sun	No
Dover 1	60 Biggin Street, Dover, CT16 1DD	E01024215	Dover 013B	E07000108	Dover	2105	1	24 Hours	10am-6pm Mon-Sun	No
Dover 2	9 Biggin Street, Dover, CT16 1BD	E01024215	Dover 013B	E07000108	Dover	2105	1	24 Hours	24 Hours Mon-Sun	No
Tottenham	448-454 High Road, London, N17 9JN	E01002081	Haringey 012D	E09000014	Haringey	2971	1	9am-midnight Mon-Sat 9am-11pm Sun	9am-midnight Mon-Sat 9am-11pm Sun	Yes
Portsmouth 1	101 Commercial Road, Portsmouth, PO1 1BQ	E01017032	Portsmouth 016B	E06000044	Portsmouth	3086	1	24 Hours	24 Hours Mon-Sun	No
Portsmouth 3	3 Edinburgh Road, Portsmouth, PO1 1DE	E01017032	Portsmouth 016B	E06000044	Portsmouth	3086	1	24 Hours	9am-10pm Mon-Sun	No



COMBINED OPERATING LICENCE

Number: 000-052732-N-329729-007

This licence issued under Part 5 of the Gambling Act on 27 November 2018 is amended under section 104 of the Act .

The effective date of the amendment is ¹ 18 January 2022

Part 1

This operating licence² is issued to:

City Gaming Limited
trading as City Slots; Game Nation; Golden Touch; Palace
Amusements
of
4 Cavendish Square
London
W1G 0PG

This Licence authorises the Licensee to carry out the following activities:

to provide facilities for playing bingo; to make gaming machines available for use in an adult gaming centre; to supply, install, adapt, maintain or repair (but not manufacture) a gaming machine or part of a gaming machine

Signed on behalf of the Gambling Commission



Programme Director

¹ Note: Licences may be surrendered, lapse, be forfeit or be revoked in accordance with sections 113, 114, 115, 118 or 119 of the Act. Under section 111 of the Act the Commission may determine that licences, or licences of a specified class, shall cease to have effect at the end of a specified period

² which is not a remote licence

This Licence is subject to the following conditions:

- The specific conditions attached to this licence by the Commission by virtue of section 77 of the Act, which are set out below
- the statutory conditions attached by virtue of the Act: these are set out in the enclosed documents
- the general conditions imposed by the Commission by virtue of section 75 of the Act, which are set out in the enclosed documents
- the general conditions imposed by the Secretary of State by virtue of section 78 of the Act which are set out in the enclosed documents

Part 2 Commission Specific Conditions

1. Until the time that the licensee becomes operational, the licensee must provide a written quarterly management summary report to the Commission within 28 days of the end of each quarter. The first report is due no later than 31 March 2019 and must include:

- a) Up to date bank statement from the UK business bank account; once opened
- b) Details of where and how any funds have been used.
- c) Details of what actions have been taken by the licensee to become operational, this should include details of any third parties that are taking steps on the Licensee's behalf.

2. Before commencement of trading the Licensee will provide the Commission will evidence of a UK business bank account and evidence of the transfer of the funding for the licence activity in to the bank account in the name of City Gaming Limited

3. The licensee must notify the Commission no later than 28 days prior to the commencement of trading of their intention to trade and the premises that they will trade from.

4. The licensee must provide the Commission no later than 28 days before they intend to commence trading from any premises with the following:

- a) copies of revised policies and procedures
- b) risk assessment for the premises
- c) business continuity plan
- d) details of all third parties to be used

5. Machine Maintenance-This licence is subject to the condition that the authorised activities may only be provided by the licensee itself or, as principle, through the agency of City Gaming Leasing Limited

6. This Licence is subject to the condition that the authorised gambling facilities may only be provided by the licensee itself or, as principal, through the agency of the company specified against the relevant activity below:

Providing facilities for bingo:

Family Leisure Holdings Limited
Family Leisure Victoria Limited
Family Leisure Euston Limited
Family leisure Gerrard Limited
Atlantic Amusements Limited
Errolbrook Limited

Conditions specific to providing facilities for playing bingo

This licence is subject to the condition that the annual gross gambling yield is less than £200,000.

Conditions specific to making gaming machines available for use in an adult gaming centre

This licence is subject to the condition that the annual gross gambling yield is less than £30,000,000

Conditions specific to supplying, installing, adapting, maintaining or repairing (but not manufacturing) a gaming machine or a part of a gaming machine

This licence is subject to the condition that the value of the licensee's annual gross sales is less than £550,000.

City Gaming Limited (52732), Family Leisure Holdings Limited (1875), Mulbrook Limited (37250) and Whittaker Arcades Limited (49054)

Trading as City Slots, Game Nation, Palace Amusements, Play 2 Win, Reel Time, Vegas Gold, Las Vegas, Oak Amusements, Gaming Fun, Golden Touch

Money Laundering / Terrorist Financing / Proceeds of Crime Act (ML / TF / PoCA) Arcade Business Risk Assessment

Version: 1.10

Dated: **September 2022**

Updated By: **Graham Glanfield – Consultant**

ML/TF/PoCA risk overview	
Business Head Office Address	4 Cavendish Square London W1G 0PG
Overall ML/PoCA Risk	Our business model and gaming machines are not ideally suited for exploitation and use for money laundering purposes and the overall risk of Money Laundering, Terrorist Financing and receipt of Proceeds of Crime is still considered to be low as only 3 sites operate full TITO compared to two when this Risk Assessment was first written.
Summary of business	Arcade (AGC) operator, offering a variety of gaming machines, category B3, C and some D. Arcades provide our customers an opportunity to gamble, meet and socialise in a safe controlled environment. We currently have 59 trading locations Employing over 400 People The business is geographically managed via four Regions – London North / London South / London Greenfield / North We have 13 PML Holders

ML, TF & POCA Business Risk Assessment
City Slots/Family Leisure
Version 1.10 Dated 27th September 2022

Local Area Risk Assessments	Local Area Risk Assessments have been completed for all AGC premises and retained on site.
There are two recognised forms of Money Laundering in relation to gambling.	a/ Exchanging money, assets, goods and property that were acquired criminally for money or assets that appear to be legitimate or clean. This is frequently achieved by transferring or passing funds through some form of legitimate business transaction or structure. This “Classic” Money Laundering normally consists of a number of stages – Placement, Layering and Integration. b/ The use of criminal proceeds to fund gambling as a leisure activity. So called criminal or lifestyle spend.
Methodology	<p>A risk based approach is utilised whereby the potential threats from known and emerging risks to the business and customers are assessed and appropriate policies, procedures and controls established to manage and mitigate these risks, establish ongoing monitoring and improvement of these controls and record what has been done and why. (Licence condition 12.1.1)</p> <p>From Identification, analysis and evaluation, the known risks are:</p> <ul style="list-style-type: none"> • Senior Management failing to comply with money laundering and terrorist financing legislation and guidance. • Businesses being acquired by organised crime to launder proceeds of crime. • Lack of competence of key personnel and licence holders which can then be exploited by criminals seeking to launder the proceeds of crime. • Anonymous customers laundering proceeds of crime through gaming machines. • Server Based Gaming machines using Automatic Ticket Redemption machines, ATRs or Kiosks, to launder criminally derived funds. • TITO facilities used in conjunction with ATR or Kiosk machines to launder criminally derived funds Note - Only one additional TITO site on City Gaming operation since the Risk Assessment was first written.. • Privacy booths which can limit the amount of supervision and interaction from venue staff. (Not applicable to City Gaming Limited venues) • Dyed or stained notes being laundered through gaming machines. • Emerging risks such as Cashless Apps and Bring Your Own Device which increase the risk of reduced KYC interactions, transactions not monitored in real time, customers could gamble without interaction with venue staff and “Smurfing” whereby customers could make numerous low level transactions to avoid suspicion. <p>The risks and measures employed are detailed through the following pages of this assessment.</p> <p>The following guidance documents have been reviewed and taken into account in conjunction with the review of this Risk Assessment :</p> <ul style="list-style-type: none"> • Gambling Commission Money Laundering and Terrorist Financing Risk Assessment 2019 • Gambling Commission Money laundering and terrorist financing risk within the British gambling industry • Gambling Commission Duties and responsibilities under the Proceeds of Crime Act 2002 – November 2020 • Gambling Commission Raising Standards for consumers. Compliance and enforcement report 2020 to 2021 .

Summary Risks to Business	<p>The level of stakes and prizes which apply to gaming machines in our arcade venues and the measures in place in SBG machines and handpay mechanism make for a continued low overall risk. The amount of time and level of investment which would be required to cycle a significant amount of illicit cash through these machines would render this an impractical means of laundering money.</p> <p>Our business is highly regulated, through the oversight of the Gambling Commission, and Licensing Authorities and through a strong industry commitment to self-regulation. We hold operating licences granted by the Gambling Commission as well as AGC premises licence(s) granted by Licensing Authorities. All management receive induction and refresher training on Company Policy and Procedure, including Money Laundering and training records are maintained.</p> <p>The principle risks in respect of ML and TF is from customers potentially spending money obtained from a criminal source, or criminal spend or forged/faked notes. Customers could also recycle cash through games in an attempt to conceal its source. Customers could also attempt to use the Ticket In Ticket Out (TITO) systems to attempt to recycle notes. However, our assessment is that the only activities which would hold out the prospect of a sufficiently large payout ratio to make for effective money laundering through recycling is through the use of Category B3 gaming machines. The impracticality of using gaming machines as a laundering mechanism reinforces the continued low risk it presents.</p> <p>In the event of any ML or TF incident being reported to the designated Money Laundering Officer (MLO), David Allard, it will be the MLO's decision as to whether the incident should be reported to the National Crime Agency (NCA), usually via the preferred reporting process of a Suspicious Activity Report (SAR's) .</p>		
Historical incidents of ML/PoCA problems	None		
Names and Positions of Persons Completing the Risk Assessment	Graham Glanfield Darren Russell Paul McGhee Edmir Dashja Mark Field David Allard	3rd Party Consultant Director of Operations - North Regional Director Business Development Manager Operations Director Finance Director (MLO)	
Identify the risks of ML/TF/POCA and controls to manage those risks	Description of Risk	Level of Risk	Controls
Details of customer base, customer behaviour and	Dyed notes/Smurfing	Low	We predominantly operate venues within the local community; however, we do have 4 locations that cater for more transient Customers

ML, TF & POCA Business Risk Assessment
City Slots/Family Leisure
Version 1.10 Dated 27th September 2022

<p>description of any risk they present</p>	<p>The majority of customers are known to the staff and management. Staff are actively encouraged to interact with customers in order to build relationships.</p> <p>Low risk of new customers carrying out one off transactions. Customers who are not regulars to the venue should be easily identified by staff.</p> <p>Customers who may attempt to use stained or fake notes are likely to be identified quickly by circulating staff.</p> <p>Money laundering through TITO and SBG Machines</p>	<p>Two close to main transport hubs. Kings Cross and Victoria train stations, along with 2 in tourist locations in Soho.</p> <p>The demographics of our community venues suggests circa 80% are local, within 3 miles of each venue. Venue Managers are encouraged to know their Customers</p> <p>Premises permanently staffed. Staffing levels approved by senior management following completion of risk assessments</p> <p>Use the CCTV throughout licensed premises All staff are vetted and ID verified upon employment. Results are recorded onto our central Data Base (IHL Smart Hub) Staff receive induction and refresher training on Company policy and procedures including 'Know Your Customer', due diligence, customer monitoring and interaction requirements. Interactions are recorded on our central Data Base (IHL Smart Hub) Regular customers known to staff members, which facilitates profiling and knowledge of customer activity.</p> <p>All Premises operate Challenge/ 25 age verification.</p> <p>SBG Data plays an important part of our income data set. EG Turnover / Hold / Ave Stake below / Margin.</p> <p>Combination of CAT B3 & C</p>
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		<div data-bbox="1317 197 1724 239" style="background-color: #2c4e64; color: white; padding: 5px; text-align: center;">Headlines</div> <table border="1" data-bbox="1317 252 1724 598"> <thead> <tr> <th>This Week</th> <th>Week 6</th> <th>% Change</th> </tr> </thead> <tbody> <tr> <td>Reporting Units:</td> <td style="color: orange;">33</td> <td style="color: green;">↑ 2</td> </tr> <tr> <td>Cash In Per Reporting Unit:</td> <td style="color: orange;">£2,185.68</td> <td style="color: red;">↓ -0.24%</td> </tr> <tr> <td>Turnover Per Reporting Unit:</td> <td style="color: orange;">£5,849.29</td> <td style="color: red;">↓ -19.32%</td> </tr> <tr> <td>Plays Per Reporting Unit:</td> <td style="color: orange;">5,163</td> <td style="color: red;">↓ -11.61%</td> </tr> <tr> <td>Value Retained Per Reporting Unit:</td> <td style="color: orange;">£584.60</td> <td style="color: red;">↓ -2.90%</td> </tr> <tr> <td>Average Stake:</td> <td style="color: orange;">£1.13</td> <td style="color: red;">↓ -8.72%</td> </tr> <tr> <td>Margin:</td> <td style="color: orange;">9.99%</td> <td style="color: green;">↑ 1.69%</td> </tr> <tr> <td>Outlets:</td> <td style="color: orange;">15</td> <td style="color: green;">↑ 7.14%</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Inspired SBG machines have an AML trigger built into the software that means a customer has to play off 15% of their stake before being able to "cash out" In the event of a customer attempting to cash out without playing, the machine will allocate a TITO ticket but render it void until further investigation from the management team for authorisation Machine float levels have been reduced to a base level of circa £50. Therefore any wins over £50 are paid by hand through a member of staff who will log details of all such interactions. These interactions were recorded as a written events log but more recently are digitally recorded using our ASK kiosks. All Handpay details are now captured via a CSA interaction via a smart card The CSA taps the kiosk with their smart card. This identifies the staff member. The machine is identified by a unique serial number, the amount to be hand paid is selected and the kiosk then dispenses that amount. All data is subsequently available via the Integrated Collection System showing CSA, machine and cash value. This data now forms part of our security profiling. 	This Week	Week 6	% Change	Reporting Units:	33	↑ 2	Cash In Per Reporting Unit:	£2,185.68	↓ -0.24%	Turnover Per Reporting Unit:	£5,849.29	↓ -19.32%	Plays Per Reporting Unit:	5,163	↓ -11.61%	Value Retained Per Reporting Unit:	£584.60	↓ -2.90%	Average Stake:	£1.13	↓ -8.72%	Margin:	9.99%	↑ 1.69%	Outlets:	15	↑ 7.14%
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	<p>Are any customers involved in business that handle large amounts of cash?</p> <p>Are any customers known to have criminal backgrounds or associate with criminals</p> <p>Are customers known to seek to obtain or provide loans to other customers?</p> <p>Does systematic money lending take place between one or more customers?</p>		<p>No</p> <p>No</p> <p>This is reported through IHL on very rare occasions and action is always taken to prevent further occurrences.</p> <p>No</p> <p>Active monitoring of CCTV and the installations of CCTV Spotter screens reduces the risk of transient customers who are not local to the premises. Early engagement on entrance is paramount. E-learning platform will deliver specific training around know your Customer & Positive interaction and de-escalation.</p> <p>Staff Guard is a remote monitoring system that helps provide additional security, this comprises of remote monitoring and personal panic alarms. This is combined with Mag Lock door controls. This system is widely deployed across our estate.</p> <p>Customers who refuse to provide identification are always asked to leave.</p>
<p>Details of Venues and Locations</p>	<p>Identify local risk: Areas of high crime compared to national averages. Nearby schools, religious buildings, support services for vulnerable individuals. Other nearby gambling premises.</p>	<p>Low</p>	<p>Local Risk Assessment completed for all premises, subject to annual review. All premises permanently manned by trained staff members. Use of CCTV throughout premises Relationship maintained with local police licensing team and local authority.</p>

			Company marketing policy applied in accordance with LCCP and ASA and industry guidance. Challenge/Think 25 age verification. Staff trained to monitor customer behaviour and complete customer interaction, where appropriate to do so.
Product / Service			
Gaming machines Category B3, C, D, (B4)	<p>Gaming machines operated by inserting cash, tokens, smart cards, or tickets (but not credit cards or debit cards)</p> <p>Category B3 Max. stake £2 Max. prize £500 Category B4 Max. stake £2 Max. prize £400 Category C Max. stake £1 Max. prize £100 Category D Max. stake 10p Max. prize £5</p> <p>In the case of Category B3 gaming machines, it would be theoretically possible for a money launderer to recycle cash through machines, accepting a loss in the region of 10%. However, the practical constraints of feeding the machine place a relatively low upper limit on the amount which could be recycled in this way. This combined with a HandPay threshold of just £50 on B3 machines makes it a very unattractive way to launder money.</p> <p>In order to achieve a return up to the level of the 2,000 Euro threshold proposed a player on a B3 machine would need to stake (assuming a 90% return to the player) some €2,222 (£1,977), requiring over 900 plays of the machine.</p>	Low	<p>Supervision of gaming machine area provided by staff at all times Staff trained to look out for unusual/dyed notes. Staff trained to report any concerns to Duty Manager. CCTV coverage over all machines Senior staff perform all note collections Full machine audit on all machines on a weekly basis – ad hoc spot check in case of any suspicion Staff & management to be alert to customers attempting to exchange large volumes of paper notes for alternative denominations. Staff trained to watch suspicious behaviour, signs of stress, red flag indicators. E.g. Spend inconsistent with apparent income or unusual patterns of play. Potential AML incidents are recorded on the IHL Smart Tablet. Gaming machines are only supplied and maintained by businesses licensed by the Gambling Commission and machine audit trail retained. Analysis of cash staked and ticket transactions Instances of nil or low play of cash staked before redemption are cross checked to CCTV to identify individual(s). Instances of high stake values are cross checked to CCTV to identify individuals(s). Profiling of member(s) found to redeem stake with little or no play and who have high stakes, ascertaining further detail of spend levels and where appropriate additional personal information including source of funds. A HandPay process is used on Category B3 machines whereby a customer selecting to cash out any funds over the value of £50 will be paid through interaction with a member of staff rather than automatically being dispensed by the gaming machine. This acts as a further deterrent to criminal or money laundering activity.</p>

Treasury/Cash Office/change machines/ATMs	Banking activities Machine collections	Very Low	<p>All Treasury staff trained on ML/TF/PoCA Staff trained to look out for unusual/dyed notes Staff trained to report any concerns to Manager / Capturing all events on the IHL SMART HUB for Snr Manager Review.</p> <p>CCTV coverage in cash office areas Treasury staff are permanent</p> <p>All cash banking completed by senior staff members Staff & management to be alert to customers exchanging large volumes of paper notes for alternative denominations Any ML/TF/PoCA concerns/suspicious reported to Senior Management</p> <p>Gaming Machines' emptied by approved staff members.</p>	
Assessment Review				
Frequency of Review	Every 12 months or after any incidents or changes	Date Review Due :	September 2023	
Signature of Lead Assessor				
Signature of City Gaming Ltd Director		Position	Date	

GAME NATION – CUSTOMER AND STAFF NOTICES

It's important to provide our customers with all the information they need to have fun and feel safe and valued in our venues. It's also very important that our venue staff are well training and comfortable with their obligations. Reminders though visual notices is one way we use to drive home those important messages.

Eye catching and easy to read notes are posted in venue and back of house as a constant daily reminder.



FRONT OF HOUSE OF NOTICES

- Each venue has the House Rules notice poster local to the entrance, suited to that venue.
 - Pictograms highlighting CCTV, no alcohol or smoking etc.
 - Highlighting the complaints process, we also have a dedicated poster and leaflets for this
 - Responsible Gambling
- Complaints and Disputes Policy notices, several size versions and take away leaflets
- Think 25 notices would be posted local to entrance and through out the venue.
- Our "IT'S ALL UNDER CONTROL" poster available in several sizes, located throughout the venue. Highlighting GamCare details.

House Rules

COMPLAINTS & FEEDBACK

RESPONSIBLE GAMBLING

AGE VERIFICATION

GAMBLING ACT 2005

GAME NATION
SLOTS CLUB • LOUNGE

COMPLAINTS & FEEDBACK POLICY

IF YOU HAVE A COMPLAINT OR DISPUTE ABOUT THE OUTCOME OF A GAMBLING TRANSACTION OR WOULD LIKE TO MAKE A COMMENT ABOUT THE QUALITY OF SERVICE, FOOD OR BAR, PLEASE SPEAK TO A MEMBER OF OUR VIBE TEAM WHO WILL TRY TO RESOLVE MATTERS OR NOTE YOUR FEEDBACK.

Your complaint will be electronically recorded on our systems. If you have an issue that is not resolved within 48 hours, it will then be escalated to our management team who will respond within 5 working days, and you will be sent an acknowledgment email with a unique reference code.

You can visit also visit our website and log your complaint/ comment via the same system: www.gamenation.co.uk

If you prefer to correspond in writing, our contact details are below:

Customer Care
City Gaming Limited
4 Cavendish Square
London
W1G 0PC

If you have a made a complaint and are not satisfied with the outcome of the investigation, then you have the option to take the complaint to our alternative dispute resolution (ADR) service provider:

CEDR (Centre for Effective Dispute Resolution)
www.cedr.com
020 7300 3800

For details of the company operating this venue please refer to the House Rules poster

GAME NATION
SLOTS CLUB • LOUNGE

Remember we are obliged to ask for proof of age - It's a legal requirement

Think 25

If you are lucky enough to look under 25, you will be asked to prove that you are over 18

When you enter this area

Accepted ID

bacta
www.bacta.org.uk

IT'S ALL UNDER CONTROL

WE'RE HERE TO HELP YOU STAY IN CONTROL OF YOUR GAMBLING.

GamCare CALL US FREE: 0808 8020 133
GAMCARE.ORG

BeGambleAware.org
Helpline: 0800 800 133

PLAY RESPONSIBLY PLAY RESPONSIBLY PLAY RESPONSIBLY

FRONT OF HOUSE OF NOTICES

- Our “IT’S ALL UNDER CONTROL’ Bi-Fold leaflets, available throughout the venue for anyone to take away, including the toilets for customers to take discreetly
- The leaflets are there to help our customers and anyone who asks for help, highlight potential problems and signpost facilities that can help and support.

HERE TO HELP

GamCare

CALL US FREE: 0800 8020 133
GAMCARE.ORG

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling. Their helpline is run by trained staff who can offer counselling, information and advice, to problem gamblers, family members and to friends of gamblers.

IT'S ALL UNDER CONTROL

WE'RE HERE TO HELP YOU STAY IN CONTROL OF YOUR GAMBLING.

GAME NATION
HELP • CARE • SUPPORT

18+ BeGambleAware.org
PLAY RESPONSIBLY

THE GOLDEN RULES OF PLAYING FRUIT MACHINES

- Playing machines is buying fun, NOT investing money
- Only play with money you can AFFORD to lose
- Set LIMITS on what you will spend
- Playing within your means can be fun and exciting
- Spending outside your means can create PROBLEMS for you and others

PROBLEM GAMBLING

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

Gambling becomes a problem when you:

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

CALCULATING THE RISK

- Gambling is a fun and exciting form of entertainment, which provides an enjoyable experience
- Playing slot machines is an attractive way of taking a risk as long as the risk is kept under control
- The great majority of people who play slot machines or gamble in other ways enjoy the experience without any problems, but a very small number lose control of what they are doing
- For these players gambling ceases to be fun
- Their life can be dominated by gambling

STAYING IN CONTROL

Whenever you play machines it is wise to remember that:

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

CHECKING IT OUT

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

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

IF YOU FEEL YOU ARE IN DIFFICULTY WITH YOUR GAMBLING, OR KNOW SOMEONE WHO IS AND WOULD LIKE TO HELP: CALL THE NATIONAL HELPLINE OPERATED BY GAMCARE BELOW

WE'RE HERE TO HELP | CALL US FREE: 0800 8020 133 | GAMCARE.ORG

GAME NATION BACK OF HOUSE

- Back of house posters as a constant visual reminder of important messages and information. Smaller versions available for venues with limited wall space
 - Details of the 3 main licensing objective with explanations
 - Customer Journey flow chart. KNOW YOUR CUSTOMER
 - Customer greeting, age checking process, repeated friendly interactions to monitor the customers well being.
 - Self Exclusion. Easy guide flow chart on the SE process, constant reminder for all to feel comfortable and confident in supporting our customers should they wish to SE
 - Emergency Support Procedures, lines of communication for all venue staff, should they require help and support.

GAME NATION GAMBLING ACT

IT'S YOUR RESPONSIBILITY TO ENSURE WE ADHERE TO THE GAMBLING ACT AT ALL TIMES.

THE LICENSING MAIN OBJECTIVES FOR THE GAMBLING ACT ARE:

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

• CHASE

WHAT DOES THIS MEAN AND WHAT SHOULD I DO?

Be aware and report any of the following:

- Customers spending beyond their means.
- Customers chasing and not accepting their limit of gambling spend.
- Customers chasing and not accepting their limit of gambling spend.
- Customers chasing and not accepting their limit of gambling spend.

• OPEN & FINE

WE MUST ENSURE THAT WE ADHERE TO THE FOLLOWING:

- That all customers continue to play responsibly.
- That all employees continue to play responsibly.
- That all employees continue to play responsibly.
- That all employees continue to play responsibly.

• PROTECT

WHAT DO WE NEED TO PROTECT?

- Welfare of our customers.
- Welfare of our employees.
- Welfare of our customers.
- Welfare of our employees.

CUSTOMER JOURNEY

```

graph TD
  Start([WELCOME TO CLUB]) --> Q1{WHEN A CUSTOMER WALKS THE SHOP}
  Q1 -- YES --> Q2{DO YOU KNOW THEM?}
  Q1 -- NO --> Q3{DO YOU KNOW THEM?}
  Q2 -- YES --> Q4{IF THEY WALKS INTO THE SHOP DO YOU KNOW THEM?}
  Q2 -- NO --> Q5{DO YOU KNOW THEM?}
  Q3 -- YES --> Q6{DO YOU KNOW THEM?}
  Q3 -- NO --> Q7{DO YOU KNOW THEM?}
  Q4 -- YES --> Q8{DO YOU KNOW THEM?}
  Q4 -- NO --> Q9{DO YOU KNOW THEM?}
  Q5 -- YES --> Q10{DO YOU KNOW THEM?}
  Q5 -- NO --> Q11{DO YOU KNOW THEM?}
  Q6 -- YES --> Q12{DO YOU KNOW THEM?}
  Q6 -- NO --> Q13{DO YOU KNOW THEM?}
  Q7 -- YES --> Q14{DO YOU KNOW THEM?}
  Q7 -- NO --> Q15{DO YOU KNOW THEM?}
  Q8 -- YES --> Q16{DO YOU KNOW THEM?}
  Q8 -- NO --> Q17{DO YOU KNOW THEM?}
  Q9 -- YES --> Q18{DO YOU KNOW THEM?}
  Q9 -- NO --> Q19{DO YOU KNOW THEM?}
  Q10 -- YES --> Q20{DO YOU KNOW THEM?}
  Q10 -- NO --> Q21{DO YOU KNOW THEM?}
  Q11 -- YES --> Q22{DO YOU KNOW THEM?}
  Q11 -- NO --> Q23{DO YOU KNOW THEM?}
  Q12 -- YES --> Q24{DO YOU KNOW THEM?}
  Q12 -- NO --> Q25{DO YOU KNOW THEM?}
  Q13 -- YES --> Q26{DO YOU KNOW THEM?}
  Q13 -- NO --> Q27{DO YOU KNOW THEM?}
  Q14 -- YES --> Q28{DO YOU KNOW THEM?}
  Q14 -- NO --> Q29{DO YOU KNOW THEM?}
  Q15 -- YES --> Q30{DO YOU KNOW THEM?}
  Q15 -- NO --> Q31{DO YOU KNOW THEM?}
  Q16 -- YES --> Q32{DO YOU KNOW THEM?}
  Q16 -- NO --> Q33{DO YOU KNOW THEM?}
  Q17 -- YES --> Q34{DO YOU KNOW THEM?}
  Q17 -- NO --> Q35{DO YOU KNOW THEM?}
  Q18 -- YES --> Q36{DO YOU KNOW THEM?}
  Q18 -- NO --> Q37{DO YOU KNOW THEM?}
  Q19 -- YES --> Q38{DO YOU KNOW THEM?}
  Q19 -- NO --> Q39{DO YOU KNOW THEM?}
  Q20 -- YES --> Q40{DO YOU KNOW THEM?}
  Q20 -- NO --> Q41{DO YOU KNOW THEM?}
  Q21 -- YES --> Q42{DO YOU KNOW THEM?}
  Q21 -- NO --> Q43{DO YOU KNOW THEM?}
  Q22 -- YES --> Q44{DO YOU KNOW THEM?}
  Q22 -- NO --> Q45{DO YOU KNOW THEM?}
  Q23 -- YES --> Q46{DO YOU KNOW THEM?}
  Q23 -- NO --> Q47{DO YOU KNOW THEM?}
  Q24 -- YES --> Q48{DO YOU KNOW THEM?}
  Q24 -- NO --> Q49{DO YOU KNOW THEM?}
  Q25 -- YES --> Q50{DO YOU KNOW THEM?}
  Q25 -- NO --> Q51{DO YOU KNOW THEM?}
  Q26 -- YES --> Q52{DO YOU KNOW THEM?}
  Q26 -- NO --> Q53{DO YOU KNOW THEM?}
  Q27 -- YES --> Q54{DO YOU KNOW THEM?}
  Q27 -- NO --> Q55{DO YOU KNOW THEM?}
  Q28 -- YES --> Q56{DO YOU KNOW THEM?}
  Q28 -- NO --> Q57{DO YOU KNOW THEM?}
  Q29 -- YES --> Q58{DO YOU KNOW THEM?}
  Q29 -- NO --> Q59{DO YOU KNOW THEM?}
  Q30 -- YES --> Q60{DO YOU KNOW THEM?}
  Q30 -- NO --> Q61{DO YOU KNOW THEM?}
  Q31 -- YES --> Q62{DO YOU KNOW THEM?}
  Q31 -- NO --> Q63{DO YOU KNOW THEM?}
  Q32 -- YES --> Q64{DO YOU KNOW THEM?}
  Q32 -- NO --> Q65{DO YOU KNOW THEM?}
  Q33 -- YES --> Q66{DO YOU KNOW THEM?}
  Q33 -- NO --> Q67{DO YOU KNOW THEM?}
  Q34 -- YES --> Q68{DO YOU KNOW THEM?}
  Q34 -- NO --> Q69{DO YOU KNOW THEM?}
  Q35 -- YES --> Q70{DO YOU KNOW THEM?}
  Q35 -- NO --> Q71{DO YOU KNOW THEM?}
  Q36 -- YES --> Q72{DO YOU KNOW THEM?}
  Q36 -- NO --> Q73{DO YOU KNOW THEM?}
  Q37 -- YES --> Q74{DO YOU KNOW THEM?}
  Q37 -- NO --> Q75{DO YOU KNOW THEM?}
  Q38 -- YES --> Q76{DO YOU KNOW THEM?}
  Q38 -- NO --> Q77{DO YOU KNOW THEM?}
  Q39 -- YES --> Q78{DO YOU KNOW THEM?}
  Q39 -- NO --> Q79{DO YOU KNOW THEM?}
  Q40 -- YES --> Q80{DO YOU KNOW THEM?}
  Q40 -- NO --> Q81{DO YOU KNOW THEM?}
  Q41 -- YES --> Q82{DO YOU KNOW THEM?}
  Q41 -- NO --> Q83{DO YOU KNOW THEM?}
  Q42 -- YES --> Q84{DO YOU KNOW THEM?}
  Q42 -- NO --> Q85{DO YOU KNOW THEM?}
  Q43 -- YES --> Q86{DO YOU KNOW THEM?}
  Q43 -- NO --> Q87{DO YOU KNOW THEM?}
  Q44 -- YES --> Q88{DO YOU KNOW THEM?}
  Q44 -- NO --> Q89{DO YOU KNOW THEM?}
  Q45 -- YES --> Q90{DO YOU KNOW THEM?}
  Q45 -- NO --> Q91{DO YOU KNOW THEM?}
  Q46 -- YES --> Q92{DO YOU KNOW THEM?}
  Q46 -- NO --> Q93{DO YOU KNOW THEM?}
  Q47 -- YES --> Q94{DO YOU KNOW THEM?}
  Q47 -- NO --> Q95{DO YOU KNOW THEM?}
  Q48 -- YES --> Q96{DO YOU KNOW THEM?}
  Q48 -- NO --> Q97{DO YOU KNOW THEM?}
  Q49 -- YES --> Q98{DO YOU KNOW THEM?}
  Q49 -- NO --> Q99{DO YOU KNOW THEM?}
  Q50 -- YES --> Q100{DO YOU KNOW THEM?}
  
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SELF EXCLUSION

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graph TD
  Start([CUSTOMER REQUESTS TO SELF EXCLUDE]) --> Q1{DO YOU KNOW THEM?}
  Q1 -- YES --> Q2{DO YOU KNOW THEM?}
  Q1 -- NO --> Q3{DO YOU KNOW THEM?}
  Q2 -- YES --> Q4{DO YOU KNOW THEM?}
  Q2 -- NO --> Q5{DO YOU KNOW THEM?}
  Q3 -- YES --> Q6{DO YOU KNOW THEM?}
  Q3 -- NO --> Q7{DO YOU KNOW THEM?}
  Q4 -- YES --> Q8{DO YOU KNOW THEM?}
  Q4 -- NO --> Q9{DO YOU KNOW THEM?}
  Q5 -- YES --> Q10{DO YOU KNOW THEM?}
  Q5 -- NO --> Q11{DO YOU KNOW THEM?}
  Q6 -- YES --> Q12{DO YOU KNOW THEM?}
  Q6 -- NO --> Q13{DO YOU KNOW THEM?}
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  Q12 -- YES --> Q24{DO YOU KNOW THEM?}
  Q12 -- NO --> Q25{DO YOU KNOW THEM?}
  Q13 -- YES --> Q26{DO YOU KNOW THEM?}
  Q13 -- NO --> Q27{DO YOU KNOW THEM?}
  Q14 -- YES --> Q28{DO YOU KNOW THEM?}
  Q14 -- NO --> Q29{DO YOU KNOW THEM?}
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  Q15 -- NO --> Q31{DO YOU KNOW THEM?}
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  Q17 -- YES --> Q34{DO YOU KNOW THEM?}
  Q17 -- NO --> Q35{DO YOU KNOW THEM?}
  Q18 -- YES --> Q36{DO YOU KNOW THEM?}
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  Q19 -- YES --> Q38{DO YOU KNOW THEM?}
  Q19 -- NO --> Q39{DO YOU KNOW THEM?}
  Q20 -- YES --> Q40{DO YOU KNOW THEM?}
  Q20 -- NO --> Q41{DO YOU KNOW THEM?}
  Q21 -- YES --> Q42{DO YOU KNOW THEM?}
  Q21 -- NO --> Q43{DO YOU KNOW THEM?}
  Q22 -- YES --> Q44{DO YOU KNOW THEM?}
  Q22 -- NO --> Q45{DO YOU KNOW THEM?}
  Q23 -- YES --> Q46{DO YOU KNOW THEM?}
  Q23 -- NO --> Q47{DO YOU KNOW THEM?}
  Q24 -- YES --> Q48{DO YOU KNOW THEM?}
  Q24 -- NO --> Q49{DO YOU KNOW THEM?}
  Q25 -- YES --> Q50{DO YOU KNOW THEM?}
  Q25 -- NO --> Q51{DO YOU KNOW THEM?}
  Q26 -- YES --> Q52{DO YOU KNOW THEM?}
  Q26 -- NO --> Q53{DO YOU KNOW THEM?}
  Q27 -- YES --> Q54{DO YOU KNOW THEM?}
  Q27 -- NO --> Q55{DO YOU KNOW THEM?}
  Q28 -- YES --> Q56{DO YOU KNOW THEM?}
  Q28 -- NO --> Q57{DO YOU KNOW THEM?}
  Q29 -- YES --> Q58{DO YOU KNOW THEM?}
  Q29 -- NO --> Q59{DO YOU KNOW THEM?}
  Q30 -- YES --> Q60{DO YOU KNOW THEM?}
  Q30 -- NO --> Q61{DO YOU KNOW THEM?}
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  Q32 -- NO --> Q65{DO YOU KNOW THEM?}
  Q33 -- YES --> Q66{DO YOU KNOW THEM?}
  Q33 -- NO --> Q67{DO YOU KNOW THEM?}
  Q34 -- YES --> Q68{DO YOU KNOW THEM?}
  Q34 -- NO --> Q69{DO YOU KNOW THEM?}
  Q35 -- YES --> Q70{DO YOU KNOW THEM?}
  Q35 -- NO --> Q71{DO YOU KNOW THEM?}
  Q36 -- YES --> Q72{DO YOU KNOW THEM?}
  Q36 -- NO --> Q73{DO YOU KNOW THEM?}
  Q37 -- YES --> Q74{DO YOU KNOW THEM?}
  Q37 -- NO --> Q75{DO YOU KNOW THEM?}
  Q38 -- YES --> Q76{DO YOU KNOW THEM?}
  Q38 -- NO --> Q77{DO YOU KNOW THEM?}
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  Q39 -- NO --> Q79{DO YOU KNOW THEM?}
  Q40 -- YES --> Q80{DO YOU KNOW THEM?}
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  Q42 -- YES --> Q84{DO YOU KNOW THEM?}
  Q42 -- NO --> Q85{DO YOU KNOW THEM?}
  Q43 -- YES --> Q86{DO YOU KNOW THEM?}
  Q43 -- NO --> Q87{DO YOU KNOW THEM?}
  Q44 -- YES --> Q88{DO YOU KNOW THEM?}
  Q44 -- NO --> Q89{DO YOU KNOW THEM?}
  Q45 -- YES --> Q90{DO YOU KNOW THEM?}
  Q45 -- NO --> Q91{DO YOU KNOW THEM?}
  Q46 -- YES --> Q92{DO YOU KNOW THEM?}
  Q46 -- NO --> Q93{DO YOU KNOW THEM?}
  Q47 -- YES --> Q94{DO YOU KNOW THEM?}
  Q47 -- NO --> Q95{DO YOU KNOW THEM?}
  Q48 -- YES --> Q96{DO YOU KNOW THEM?}
  Q48 -- NO --> Q97{DO YOU KNOW THEM?}
  Q49 -- YES --> Q98{DO YOU KNOW THEM?}
  Q49 -- NO --> Q99{DO YOU KNOW THEM?}
  Q50 -- YES --> Q100{DO YOU KNOW THEM?}
  
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Emergency Support Procedure

For any incident of violence or if you require emergency support at this venue from Police, Fire Brigade or Ambulance you should call 999 immediately.

If you feel your safety is at risk you should exit the venue and get to a point of safety. If your venue has a maglock door system this should be switched off, if safe and practical to do so. This will allow entry back into the venue when the risk is over.

For issues that do not require Emergency response but do require advice or support please use the contact details below.

VENUE MANAGER: _____

AREA MANAGER: _____

REGIONAL DIRECTOR: _____

OPERATIONS DIRECTOR: _____

Your Twin site for checking in hourly when lone working is: _____

Other local sites are: _____

GAME NATION FRONTAGE WINDOW GRAPHICS

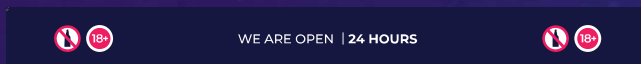
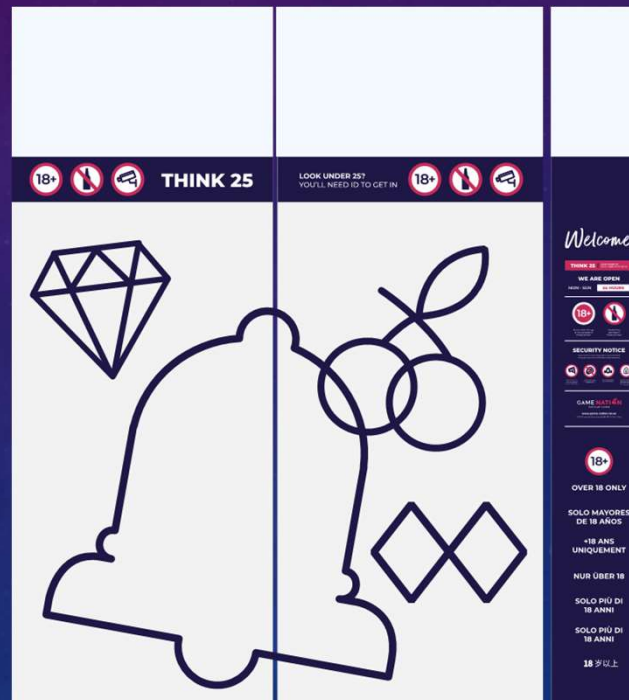
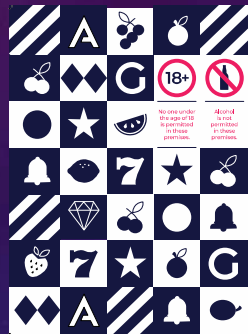
- The venue window graphics allow us to add important messages to our customers and access restrictions before they entry.
- These restriction messages are presented in multiple languages, a required.
- We also utilise the window mounted monitors to scroll messages



GAME NATION FRONTAGE

WINDOW GRAPHICS EXAMPLES

Messaging in multiple languages as required



POLITE NOTICE

Customers are not allowed to consume alcohol outside these premises. Customers consuming alcohol outside these premises may be banned. The management reserves the right to refuse entry, particularly to those who may appear intoxicated.

QTY GAMING LTD

GAME NATION BACK OF HOUSE

- Each venue will have their information station white board, this visual notice shows all staff the rolling performance of the venue, required tasks, notes and training requirements.
 - But it also reminds all staff that whilst venue performance is important, we need to always have our licensing objectives in mind.
- One of our company values is SAFE & FUN, noted on the 'Our Vision & Values' poster, this states that we take our legal and regulatory responsibilities extremely seriously, another reminder to all staff of the importance of SR.

OUR VENUE INFORMATION STATION

QUARTLEY INCOME ACTUAL	QUARTLEY BONUS TARGET	DIFFERENCE		
LAST WEEK	BUDGET TARGET	ACTUAL	DIFFERENCE	YTD DIFFERENCE
THIS WEEK	BUDGET TARGET	ACTUAL	DIFFERENCE	YTD DIFFERENCE

TOURNAMENT

TASKS

TRAINING REQUIREMENTS

OTHER REQUIREMENTS

TRAINING REQUIREMENTS

TRAINING REQUIREMENTS

TRAINING REQUIREMENTS

HERE ARE YOUR 3 MAIN LICENSING OBJECTIVES FOR YOUR VENUE

- 1 Encourage gambling cover over 18s to be under 18
- 2 Encourage gambling to be conducted in a safe & secure way
- 3 Encourage staff to become responsible gamblers

GAME NATION
SLOTS CLUB & LOUNGE

OUR VISION & VALUES

OUR VISION

TO BE THE VENUE OF CHOICE FOR LOW STAKE FUN & TO BE THE BEST IN EVERYTHING WE DO.

OUR VALUES

- ONE TEAM**
We are a FAMILY of fun and supportive people who pull together and always HELP one another.
- GET BETTER EVERYDAY**
We continue to LEARN everyday, working creatively and SHARING our ideas and knowledge with one another. We are the experts in our field.
- SAFE & FUN**
We promote a HAPPY environment, listening and engaging with people. We create EXCITING and memorable venues with the best service for our customers to enjoy. We treat it as our legal and regulatory responsibility to always create a SAFE environment for everyone.
- PRIDE & PASSION**
We are flexible, energetic and strive to go ABOVE AND BEYOND. We take pride in what we do, delivering a first class experience and customer offer.

GAME NATION
SLOTS CLUB & LOUNGE

GAME NATION STAFF



- All venue staff have name badges to identify themselves to customers.
- Think 25 badges pinned to their uniforms
- All venue staff have their credit card size Tri Fold with important information.
 - Reminders of our company values and IHL recording.
 - Importance of customer interactions and logging details on IHL
 - Constant reminder of their 3 licensing objectives





StaffGuard Features

We've developed StaffGuard™ to be simple and incredibly reliable to use. Helping your workers in conflict situations, medical emergencies or when they simply need reassurance from a friendly voice.

- An attractive slimline white impact resistant casing
- Audio verification available on any or all four alarm channels
- Built-in high volume audio verification speaker
- Built-in high sensitivity boundary microphone
- Radio single push-button key fob
- Intruder detection system monitoring as standard
- Fire detection system monitoring as standard
- Optional CCTV transmission interface
- Optional Man down Detection

