

**Chongie Entertainment UK Ltd**



# **Customer Interaction Policy**

- 1 INTRODUCTION**
- 2 IDENTIFY**
- 3 INTERACT**
- 4 EVALUATE**
- 5 CUSTOMER INTERACTION FLOW CHART**
- 6 CUSTOMER DUE DILIGENCE**
- 7 ENHANCED DUE DILIGENCE**
- 8 RECORDING**
- 9 REVIEWS**

## 1 INTRODUCTION

Chongie Entertainment UK Ltd ("CEL") takes its responsibility to protect its customers seriously. This policy is to be read in conjunction with the Social Responsibility Compliance Pack.

Customer Interaction is a vital part of protecting customers and monitoring the customer journey, and is a requirement under LCCP 3.4.1.

CEL has taken into account the Gambling Commission's guidance on customer interaction and follows an Identify-Interact-Evaluate framework. This procedure is undertaken by staff across all venues but is heavily monitored by the Senior Compliance Team. All staff are trained on this procedure, along with all other company policies and procedures, annually. Refresher training is provided when necessary.

CEL are aware that what they must put together what they know about the customer, with any relevant indicators of harm, to decide whether they need to interact. More knowledge about what to look for, with effective processes for monitoring customer behaviour, can mean quicker and better-informed decisions.

CEL's customer base is predominantly regular customers who have identifying demographical data listed in the site specific Local Area Risk Assessment (LARA) at each location. The LARA for each premises identify the make up of the area, including levels of deprivation, crime levels and community facilities which may heighten the risk of vulnerable people being exposed to gambling environments/harm.

Affordability is a key topic when considering customers and vulnerability. What may be affordable for one customer might be unaffordable for another and consequently a risk based approach rather than fixed thresholds is crucial to protect all customers from the potential harms of gambling. Staff training and a proactive Senior Compliance Team allow CEL to undertake an effective risk based approach.

## 2 IDENTIFY

Whilst there is no 'one size fits all' description of a person who may be vulnerable or at risk of problem gambling, there are several signs which can indicate a potential problem and consequently warrant further investigation. All customers are observed and monitored whilst they are in CEL premises and staff are trained to be curious about their customers.

In order to Identify individuals who are vulnerable or at risk, staff are trained to look out for the following Identifying Triggers:

- Vulnerability factors such as ill health, disability, change in life circumstances such as bereavement, homelessness and loss of a job, financial difficulties, dyslexia, brain injury or the taking of medication
- Previous self-exclusions or customer interactions
- Time and spend indicators: observed amount and frequency of time spent or large

losses. For example a customer increasing their usual game play by playing on multiple machines, or by becoming more agitated as they attempt to play faster.

- Customer contact and potential social problems: information or hints from customers, frequent complaints, or signs of distress. This might include a customer discussing serious life changes, unemployment or financial struggles, death or illness in their family, or a traumatic event.
- Play indicators: chasing losses or erratic gaming patterns
- Finding it hard to manage or stop gambling
- Such as signs of distress, agitation, or changes which could be an indication that gambling is having a negative impact on a customer's wellbeing. Customers may target aggression at staff following a loss.
- Customer contacts CEL management regularly to express dissatisfaction with gaming outcomes and overall gameplay. This can include actions such as complaining about "rigged" machines Customer-led contact
- May not be displaying obvious signs of, or overt behaviour associated with, problem gambling, however the staff member has suspicions that they are gambling beyond their means
- Have triggered session reminders, present on most B3 machines. these alerts highlight spend and time for specific gaming sessions. Although these alerts are not always specific to each individual customer, as best practice venue staff should always interact with a customer when seen. These alerts also provide a timeout period where players are unable to gamble (up to 30 seconds) which allows staff time to engage during this pause in play.
- Multiple interactions with the same customer regarding any of the above

CEL recognises how important it is to Identify any customers where there may be problems early and proactively reach out and offer support.

Every event listed above constitutes an Identifying Trigger and an Interaction must be carried out.

### **3 INTERACT**

A customer Interaction can take on many forms of action, depending on the circumstances and the individual. Staff members are not provided with a script, or questions which they must ask, as this does not tend to warrant honesty from customers due to the impersonal feel. Staff members are trained on how to interact with customers, and the below constitutes suggestions on how to initiate and carry out conversations.

The staff member should start any interaction by:

- Engaging the customer in friendly conversation to ascertain how the customer is feeling
- Offering the customer refreshments as a way to prolong the engagement from the customer.
- Asking the customer if they are comfortable with their level of gambling, helping the customer to think about their gambling activity

A customer may then demonstrate to the staff member that they are happy with their level of gambling, or provide some explanation as to the Identifying Trigger they have inadvertently hit.

In any event, a customer who demonstrated an Identifying Trigger must continue to be monitored.

If the staff member is still concerned by the customer's behaviour they must continue the interaction with the customer. This may include asking Further Follow Up 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 interaction, along with the customer's description/details must be logged for the purposes of further interaction including further gambling management options including up to possible exclusion from future participation, should any similar incidents re-occur. This recording will also be reviewed by a member of the Senior Management Team to assess whether the interaction was appropriate in the circumstances, and whether the correct course of action was taken.

Where appropriate, the member of staff will explain the various management tools in place such as self-exclusion, and will provide information on GamCare, to any customers with whom an interaction has taken place. Information regarding self-exclusion and GamCare is clearly displayed throughout the venue.

#### **4 EVALUATE**

CEL consider the Evaluate step to be the most important in this framework as it is the outcome of the interaction. There are 6 options open to staff following an Interaction:

- Allow the customer to continue gambling under observation
- Provide information on available gambling management options

- Conduct Customer Due Diligence on the customer
- Conduct Enhanced Due Diligence on the customer
- Self-Exclusion
- Barring the customer from the premises.

The circumstances of the customer interaction will dictate which of the above takes place. The staff in the premises are well trained and get to know their customers each time they visit the premises. Senior Management are always involved in the evaluation of a customer when Further Questions have been asked.

By way of example, the following would normally result in a customer being asked to consider self-exclusion, and if they refuse they will likely be barred:

- Serious aggression, refusal to engage with staff, refusal to discuss gambling tools such as self-exclusion
- Openly discussing that they are unable to stop
- Openly discussing that they cannot afford to be gambling

This is not an exhaustive list. A combination of any of the indicators listed, repeated observations of any of the indicators or any extreme behaviour can also result in a customer self-excluding or being barred.

Staff members are all well trained and consequently knowledgeable and confident to make these decisions, however the Senior Management Team are available 24/7 to discuss a customer or an interaction to help evaluate the best outcome for that customer in the circumstances.

The Corporate Governance policy sets out who is responsible for assessing Customer interactions and how they are escalated through the company.

Any customer interaction may also be assessed from a Money Laundering or POCA perspective as well if information listed or identified raises a concern in this area

## **5 Customer Interaction Flow Chart**

## **Identify**

A member of staff **IDENTIFIES** a customer who they believe may be experiencing problems with their gambling. This is completed by using the risk triggers listed along with additional observations where present.



## **Interact**

The member of staff **INTERACTS** with the customer by approaching them and striking up a conversation. Full details of the conversation are recorded in the Customer Interaction Log.



## **Evaluate**

The member of staff then **EVALUATES** the Customer Interaction with the assistance of the Senior Management Team (where required) and decides on the appropriate follow up action.



The appropriate follow up action may be:

- The customer continues to gamble
- The customer agrees to think about their gambling habits
- Customer Due Diligence or Enhanced Due Diligence is undertaken
- The customer Self-excludes
- The customer is barred



## **Monitoring**

The customer is continuously monitored regardless of the outcome of the interaction and the interaction is recorded.



## **Review**

The Venue Manager and Senior Management team will review the interaction respectively and ensure that specific cases are advised on. A wider evaluation to enhance and consistently improve the Company interaction process is also undertaken on an ongoing basis.

## **6 CUSTOMER DUE DILIGENCE**

In the event a customer is evaluated as requiring Customer Due Diligence (“CDD”), this will likely be

carried out by the Area Manager or a member of the Senior Team.

The customer 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
- Any other information which a customer might offer during an interaction, for example their employment, any family business, their financial circumstances generally, any financial problems they may be experiencing, any address history (such as a recent move from overseas).

This must be recorded on the IHL tablet.

## **7 ENHANCED DUE DILIGENCE**

In the event a customer is evaluated as requiring Enhanced Due Diligence (“EDD”), this will be carried out by a member of the Senior Team.

Enhanced Due Diligence is likely to vary between customers but should normally include:

- A secondary piece of ID
- A recent Bank Statement
- Source of Wealth
- Background checks using open sources
- Any other information which a customer might offer during an interaction

This must be recorded on the IHL tablet.

## **8 RECORDING**

All staff are trained to make meaningful records of all interactions with customers which are then available to staff to use to aid decision-making. Customer interaction recordings are also made when an interaction has been ruled out, for example, because the customer is displaying signs of agitation.

These interactions are retained on the SmartHub tablet. Staff are trained to include as much detail as possible on the SmartHub, including but not limited to:

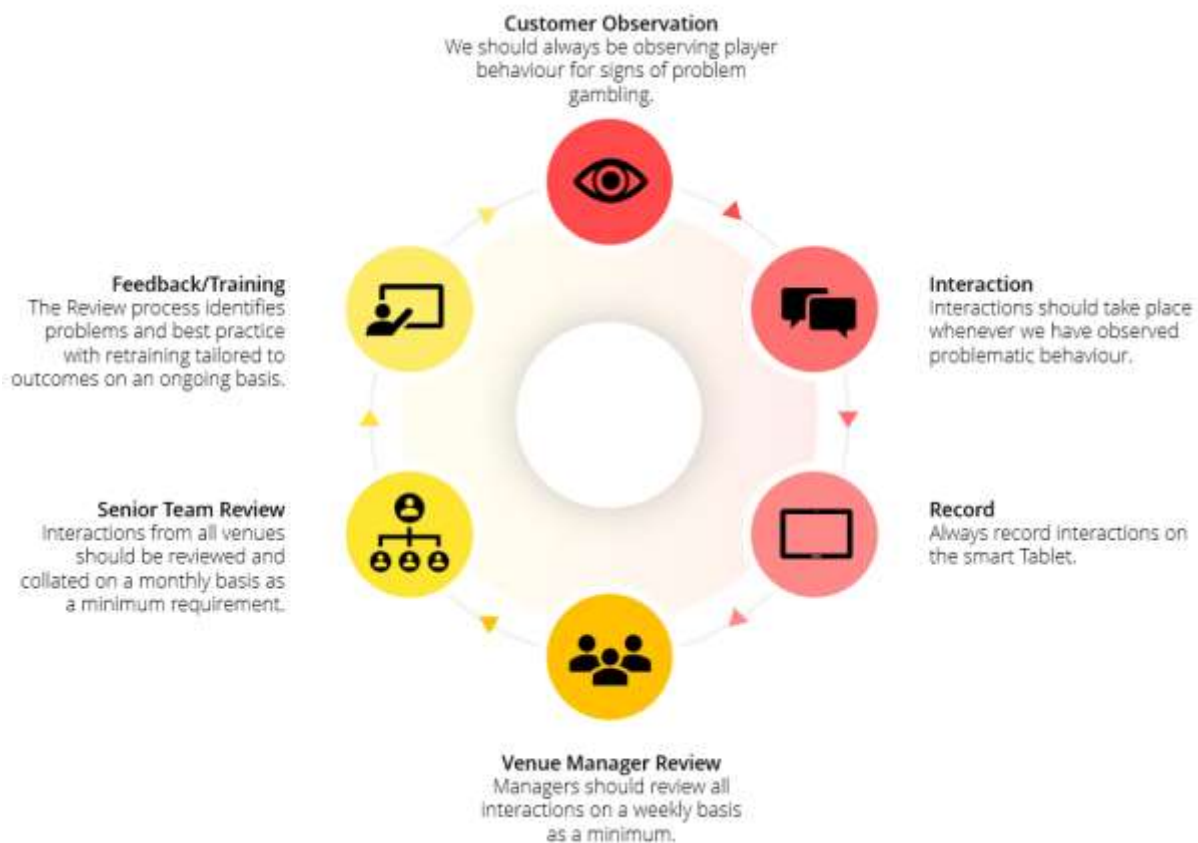
- the behaviour or activity before the interaction.
- the change in behaviour or prompt for the interaction.
- how the staff member interacted and what was said or done, for example advice or



suggestions to help the customer manage their gambling, or to take a break from their gambling, and

- what happened next.

## 9 REVIEWS



A weekly review of customer interactions is carried out by the Venue Managers in each location with the Senior Management review on a monthly basis, 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?
- Was the Customer Interaction carried out appropriately and effectively
- Was the Evaluation of the Customer Interaction appropriate in the circumstances

In the event the Senior Management Team identifies an interaction which ought to have been evaluated differently, or should have resulted in a different outcome, they will liaise with that venue

and ensure that customer is interacted with on their next visit. Additional staff training will also be provided ad hoc.

## **10 DOCUMENT REVIEW**

The Customer Interaction Policy is always measured against the Formal Guidance and in particular the following questions:

- Where concerns arise, are staff able to intervene early and engage with a customer at the right time?
- How do CEL ensure its staff are prepared and able to carry out interactions?
- Are CEL staff able to carry out customer interactions discreetly?
- Are CEL staff aware of and trained to carry out different levels of interaction?
- Have CEL allocated the right level and kind of resources to be able to interact with customers effectively when there are concerns?

The Venue managers have a monthly compliance review and training session held by the PML holder for regulatory compliance. This ensures a full feedback loop for the interaction process as well as being supported by ad hoc training, spot checks and compliance Audits.

### **Document Review**

<b>Date Reviewed</b>	<b>Reviewed by</b>
10/12/2024	Darren Hughes & Woods Whur
23/04/2025	Woods Whur