

SUBMISSION TO INDEPENDENT LIQUOR LAW REVIEW

Executive Summary

- The Star is one of Sydney's pre-eminent international tourism and entertainment destinations. The Star welcomes around 11 million guests a year and attracts approximately 40,000 guests every Friday and Saturday night.
- There is a higher level of oversight and regulation at The Star than at any other licensed venue in NSW. The Star actively works with NSW Police and the Casino Regulator to ensure that The Star remains one of the safest licensed venues for local and international guests.
- Since the commencement of the lockouts, there has been a downward trend in the number of incidents at The Star. There were 64 violent incidents in 2014 and 52 in 2015. In 2015 there was approximately one alleged assault for every 211,000 visitors.
- The Star's main focus remains on Responsible Service of Alcohol (RSA) and associated safety strategies aimed at reducing anti-social behaviour. The safety and comfort of our guests is our absolute priority and complemented by the use of more than 2,800 surveillance cameras and a security and surveillance team of 258 personnel¹.
- In any discussion on statistical analysis, critical mass must be regarded as a factor i.e.
 the number of customers received as opposed to the number of incidents which occur
 per capita on the premises.

Background

The Star is an international tourism and entertainment destination for Sydney. In a 2011 report² it was recognised as one of the top four tourist attractions in Australia, surpassed in NSW only by the Sydney Opera House.

The Star is subject to casino specific legislation - the Casino Control Act 1992 and Casino Control Regulations 2009. This legislation is typical of all Australian jurisdictions and other overseas jurisdictions such as Singapore. The Star is also subject to Commonwealth legislation and regulation such as the Anti-Money Laundering/Counterterrorism Financing Act 2006.

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¹ As at 30 March 2016

² Euromonitor International, Tourist Attractions Australia, 2011.

Casino integrated resorts occupy a unique place in that they are subject to more stringent regulation and oversight than other gaming venues. This is because they cater not only for the domestic mass market but also interstate and, increasingly, international markets. They offer a varied gaming product - gaming machines, electronic table games and table games. They have separate VIP areas that are increasingly becoming an important part of the business, particularly in relation to overseas visitation. Typically they offer high end hotel and food and beverage offerings to their guests.

In this regard, The Star is a world-class integrated resort with two 5-star hotels and serviced apartments, comprising 623 rooms, which are routinely at maximum occupancy, particularly on weekends, public holidays and during special event periods.

There are 28 restaurants and bars at The Star. Just on 2.3 million restaurant covers and 9.4 million drinks (both alcoholic and non-alcoholic) are sold per annum. Bar sales account for only 3% of The Star's revenue. Three venues in the complex are operated by third parties under their own liquor licences – The Century, Flying Fish and The Lyric Theatre.

The complex includes The Lyric Theatre, The Star Event Centre, Marquee nightclub and 23 retail outlets. The Event Centre hosted 185 events in 2015 and has a maximum concert capacity of 4,000. There are 2,701 car spaces and the complex employs 4,368 full-time employees, as well as 400 agency staff, making it one of the largest single site employers in Sydney, and NSW.

As one of Sydney's leading entertainment destinations, The Star operates 24 hours per day, 365 days a year. Approximately 11 million visits are made to The Star annually. The Star attracts approximately 40,000 guests each Friday and Saturday night. These visitation figures do not include guest numbers to restaurants and bars outside the main gaming floor and excludes guest numbers for the hotel towers, the Event Centre, the retail arcade, The Darling Spa and the Lyric Theatre.

The Star Entertainment Group recently announced its proposal for a \$1 billion capital upgrade of The Star. This will include the construction of another hotel and serviced apartment complex, likely to be operated by Ritz Carlton, ensuring that the property continues to be a world class integrated resort attracting high value international and domestic tourists to Sydney. The capital upgrade will also include the development of a new signature restaurant precinct and further expansion of our VIP gaming facilities. This upgrade will not only provide a substantial benefit to Sydney and NSW, but will lead to the employment of an additional 2,000 employees over the next five years.

In any discussion on the number of incidents occurring at The Star, it is important that it be done so taking into account critical mass. To put it in perspective, the recent Sydney FC and Western Sydney Wanderers football match (the Sydney Derby) held at Allianz Stadium drew a crowd of 41,000 fans³. By comparison, The Star attracts a Sydney Derby crowd every Friday and Saturday night of the year.

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³ 20 February 2016

Pro-active policies and a zero tolerance approach

Since the introduction of the CBD Plan of Management, The Star has never positioned itself or allowed itself to be the last resort drinking venue for late night revellers. The 2013/14 ILGA⁴ Annual Report in fact stated that the lockouts had no major impact on The Star.⁵

The Star's focus remains on RSA and safety strategies aimed at reducing the level of anti-social behaviour at The Star. The Star has a zero tolerance approach to illegal, undesirable and anti-social behaviour. The Star continues to work with NSW Police and the Casino Regulator to minimise all forms of anti-social behaviour and ensure that it remains one of the safest licensed venues for all our guests – local, interstate and international.

In this regard, regular monthly meetings are hosted by our Asset Protection Manager with the NSW Police (primarily Sydney Central LAC) as well as our Investigations Department and the Police Casino Racing Investigations Unit. Information is exchanged at these meetings to prevent the pervasive nature of assaults and illegal and undesirable elements from entering or impacting on The Star's operations. This is complemented by The Star's own internal management, internal controls, standard operating procedures, risk assessments and other policies to deal with and respond to any suspected illegal and undesirable conduct. The Star's Senior Compliance Officer reviews compliance requirements and conducts regular audits to ensure compliance with the requisite legislation and policies by The Star's staff.

The safety and comfort of our guests is The Star's absolute priority. The Star has strict refusal of entry procedures as well as best practice training in RSA and security/surveillance. There are:

- More than 2,800 surveillance cameras at The Star (compared with, for example, 99 cameras in the Sydney CBD) and;
- A security and surveillance team of approximately 258 personnel. In addition there are 45 contracted security personnel working in Marquee nightclub and 28 in the taxi ranks, and retail and food court areas every Friday and Saturday night.

There is a far higher level of oversight and regulation at The Star compared to any other licensed venue in NSW.

The Star has introduced a number of measures to ensure the safety and comfort of our guests. These measures include:

- The voluntary implementation of measures that are imposed on other venues under Schedule 4 of the Liquor Act 2007;
- The cessation of live music in the Sports Bar in early mornings to discourage late night revellers from coming to the property;
- The use of tempered (polyware) containers after midnight and the introduction of the practice of decanting glass beer bottles from midnight in all bars;
- The introduction of extended shifts for security officers to 5am in the morning;

⁴ Independent Liquor and Gaming Authority

⁵ ILGA Annual Report 2013/14, p.14

- The introduction of surveillance camera scans to identify any groups or individuals that are undesirable or at risk of reaching a state of intoxication between 11pm and 5am;
- The introduction of plain clothed security rovers who are tasked with conducting covert assessments of guests for intoxication between 11pm and 5am;
- The investment of \$4.5 million in upgrading The Star's surveillance capabilities to a digital system, which has aided the investigation of many suspected incidents of illegal behaviour, assaults and drug use;
- The prevention of individuals showing signs of intoxication from entry to The Star and the ongoing monitoring of patrons on the gaming floor. The key strategy is in minimising, responding to and preventing intoxication on the premises;
- The introduction of additional perimeter security measures to minimise potential violence in and around the Casino and to minimise the impact upon local residents. This includes Surveillance monitoring the Casino perimeter on a 24 hourly basis;
- The introduction of Electronic identification ('ID Eye') scanners on weekends at Rock Lily
 and the Marquee to mitigate violent or anti-social conduct and to assist Police with the
 ready identification of transgressors; and
- The use of The Star's Incident Reporting system remains an effective tool for tracking assaults and other forms of anti-social conduct. This system captures crucial information concerning any illegal and undesirable activities suspected or reported from any Department and is subsequently investigated or reviewed by the Asset Protection Department or Police, thus allowing for the exchange of information within The Star and the Casino Regulator in relation to incidents believed to involve illegal and undesirable conduct.

Responsible Service of Alcohol (RSA)

The Star's approach to RSA includes voluntarily adopting the following guidelines:

- Use of polyware containers in all main gaming floor bars;
- Serving free water to guests during higher risk periods;
- Shots are not generally available. Shots are allowed within 2 outlets which have strict guidelines around the serving and consumption of shots in those areas. For example, no shots are served from 2am⁶.
- Double spirit mixers are not served between 2am and 10am;
- The Star promotes low, mid-strength or non-alcoholic beverages at a lower than market price point to encourage responsible consumption;
- Low cost food and snacks are offered on the main gaming floor at all bars;
- The single number of drinks that guests are able to buy during higher risk periods are limited:
- Restaurant staff are instructed to wait for a guest to re-order rather than top up drinks automatically and complemented with regular top-up of water at tables;
- Service to a guest is to be refused if they have not finished previous alcoholic beverages served to them, to prevent drink stockpiling;

⁶ While this is The Star's policy, in practice it regularly concludes at 12am.

- Food and Beverage Managers are empowered to identify higher risk periods and manage consumption during these times by limiting the amount of drinks that can be purchased at any one time i.e. one drink per person; and
- Food and Beverage staff and Security have discretion to request a customer to reduce, cut or slow consumption which is notified to Surveillance.

Staff Training and Licensing

The Star has industry leading RSA training, policies, procedures and management oversight in place that include the following:

- Employees who are involved in the service of alcohol or who perform duties that
 require them to hold a Security Industry Licence are required to hold an approved
 Liquor and Gaming NSW RSA (and RCG) competency card from an approved
 training provider and The Star's own tailored training courses.
- Internal training is required before commencing employment at The Star. All staff undertake specific on-line and classroom training on The Star's RSA policies, procedures and applicable legislative requirements. These sessions focus on the practical application of RSA policies including:
 - The use of case studies;
 - o Role plays; and
 - Assessments of staff.
- Competency Card holders are required to complete refresher training every two
 years as are all operational staff who interact with customers who consume alcohol
 in gaming and other entertainment areas of the Casino. (e.g. Gaming and VIP staff).

Management RSA Oversight

The Star has a Responsible Service of Alcohol Committee (RSA Committee). The RSA Committee is tasked with providing leadership and direction on the issue of RSA and related matters. The RSA Committee meets every 4 to 6 weeks and has objectives which include:

- Formulating and reviewing a written RSA policy to provide guidance to staff and foster a strong RSA culture, practice and standards;
- Identifying upcoming events which require special responses and risk minimisation strategies;
- Considering and addressing compliance or policy issues arising from the RSA Policy and requirements under the Casino Control Act and Casino Control Regulation, The Star's Liquor Licence or any Liquor Accords, including independent reviews of compliance undertaken including practice, enforcement and culture; and
- Reviewing RSA statistical reports tendered at Committee meetings, monitoring trends and making recommendations in relation to RSA at The Star.

Additionally an RSA Weekly Review meeting attended by venue managers, Food and Beverage Director of Beverage, Surveillance Operations Manager, Asset Protection Risk and Compliance Manager and the Regulatory Affairs Manager, reviews and identifies

actions that have not been consistent with company policy and ensures all inconsistencies are rectified.

Statistics

The introduction of the Sydney CBD and Kings Cross Entertainment Precincts lockouts initially resulted in an increase in the number of unsuitable persons attempting entry to The Star. By illustration, the number of RSA entry refusals rose from 15,956 in 2013 to 23,318 in 2014. In 2015, the number fell to 16,320, almost down to the 2013 level.

The BOCSAR statistics for 2014 found there was an increase in alleged assaults but the increase was found to be statistically insignificant and was found to be much smaller in absolute terms than the fall in assaults in the Kings Cross and Sydney CBD Entertainment Precincts.⁷

It also needs to be noted that under BOCSAR's current statistical recording methodology, individuals involved in an incident in the surrounding streets, have been recorded against The Star. The Star believes that the BOCSAR statistics are not an accurate reflection of incidents at The Star, when it was noted from our reviews that a number of assaults attributed to The Star occurred away from the property or in some cases involved individuals or groups who had not attended the property. Despite this, BOCSAR indicated in April 2015 there was no evidence of displacement in surrounding suburbs including Pyrmont.⁸

The Star's safety record is strong. According to records (which have been agreed with by the Casino Regulator) there has been a steady decline in assaults at The Star since the Football World Cup in June 2014. These figures for 2015 show an alleged assault rate of around 1 per 211,000 visitors.

In the 2014/15 ILGA Annual Report, CEO Micheil Brodie said:

"... During the 2014/15 reporting period....assaults at the casino itself continues to show downward trends. Changes in the way inspectorate staff work with the casino and changes in security management at the casino have seen the monthly number of assaults fall from a peak of 10 in July 2014 to just 2 in June 2015."

There has been a downward trend and decrease in the number of assaults from 2014 to 2015. There were 64 incidents in 2014 and 52 in 2015. This 19% decrease has been agreed with the Casino Regulator.

While other venues are given the opportunity to review BOCSAR statistics with NSW Police, The Star has no formal process in which to do so. The Star is of the view that these statistics should be made available by BOCSAR for discussion with The Star prior to their publication. This way, inconsistencies could be reviewed and a true and accurate set of figures that are agreed on by The Star, NSW Police, Casino Regulator and BOCSAR could then be published.

The Star's business growth in recent times followed the completion in 2013 of the \$870 million investment at The Star, which has further transformed the property into an internationally competitive integrated resort. There have been significant increases in hotel

8 Ibid, p.8

⁷ Crime and Justice Bulletin No.183, April 2015, p.8

accommodation bookings and increased visitation across restaurants, banquets, theatre and on the gaming floor.

As already outlined, further development works including a new hotel, expanded VIP gaming facilities and an expanded food and beverage offering are planned for the next stage of The Star's ongoing development.

Conclusion

The Star notes the reduction in reported assaults within the current lockout zones.

The Star supports a broader response to the issue of alcohol related violence which focuses on three areas:

- Consistent enforcement of RSA laws across all licensed venues;
- Encouraging measures that promote personal responsibility and sufficiently penalise and deter individuals who engage in anti-social behaviour; and
- Provision of education and training for licensed venues and working collaboratively with them in relation to measures that promote safety and discourage illegal and anti-social behaviour.

The Star also supports a methodology of statistical analysis for alcohol related violence that factors in the number of customers received.

While The Star supports a review and evaluation of the implementation, operation and overall impacts of the current Plan of Management, it does not support an extension of the lockouts to include The Star.

Given the level of regulatory oversight, industry leading practice in terms of security and surveillance operations, staff training and the fact that The Star remains a major tourist attraction for NSW and Sydney, The Star should continue to operate under existing conditions which are already the most stringent of any venue in NSW.



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2 June 2016

The Honourable Ian Callinan AC QC Liquor Law Review GPO Box 7060 Sydney NSW 2001

Dear Sir

Re: Supplementary Information

Please find attached additional information for the purposes of the Liquor Law Review.

1. Responsible Conduct of Gaming at The Star:

The Star is committed to having programs in place to minimise the incidence of problem gambling, by providing appropriate and timely assistance, support and referrals for customers who may be experiencing difficulties associated with their gambling behaviours.

According to the *Dow Jones Sustainability Index*, The Star is recognised as a world leader in the responsible conduct of gambling ('**RCG**') by receiving a 100% rating in 2015.

A comprehensive overview of The Star's RCG programs is to be found in <u>Attachment 1.</u>

2. Conferences and Entertainment at The Star:

The Star is a tourism and entertainment precinct in its own right. The Star welcomes approximately 11 million guests per year. On a typical Saturday night the Star welcomes up to 45,000 guests. This does not account for those guests who do not enter the casino gaming floor (with the exception of Rock Lily).

To put it in perspective:

- 620 hotel rooms are full (approximately 1,400 guests);
- Total food outlets in the whole complex covers number 10,000 guests;
- The Event Centre hosts a banquet or show with approximately 800+ guests;
- The Lyric Theatre performance will have 1,500+ guests;
- Marquee will host 1,300 guests;
- Rock Lily inside the casino will host a live band performance followed by a DJ.

- The carparks will hold 3,500 vehicles;
- The number of bar unit items sold will be approximately 40,000; and
- The number of team members (FTEs) on duty number 2,400 staff.

An overview of conferences and entertainment held at The Star is found in Attachment 2.

3. The Star's Contribution to the state:

The Star makes a significant contribution to the state of NSW. Apart from being the largest single site employer in Sydney, the Star made a real contribution of \$860 million to Gross State Product in 2015.

Total taxes and other charges paid in 2015 totalled \$326 million. Of this, gaming tax paid to the NSW Treasury in 2015 was \$222.1 million.

The Star's contribution to the Responsible Gambling Fund (RGF) was \$21.4 million in 2015. The RGF funds programs and services that aim to assist those individuals that have problems with their gambling behaviour. Independent trustees make recommendations to the Deputy Premier on how to distribute these funds. Please note The Star is the sole source of funding for the Responsible Gambling Fund.

4. Total revenue breakdown:

The following table provides a breakdown of revenue by source for FY15.

International Rebate Business	20.9%
(IRB)	
Gaming	68.6%
Bar	3.2%
F&B (incl.Bar)	7.3%
Hotel	2.0%
Parking	0.8%
Other	0.4%

5. Gaming Revenue breakdown:

The following table provides a breakdown of gaming revenue for FY15.

IRB	23.4%
International Cash	2.7%
Interstate	3.0%
NSW	70.9%

6. Security and Surveillance:

The Star has always adopted a zero tolerance approach to any anti-social behaviour. The security and surveillance measures implemented at the Star including the latest surveillance technology are industry leading. The additional measures implemented since the introduction of the lockouts in the CBD and Kings Cross in 2014 are outlined in Attachment 3.

7. BOCSAR:

The Bureau of Crime Statistics and Research (BOCSAR) released its annual crime statistics on 20 April. Additionally it released a report that specifically looked at incidents in and around The Star - "Did the Lockout Law Reforms Increase assaults at The Star Casino Pyrmont."

The report concluded that it was not proved lockouts had resulted in increased assaults at The Star. The reported increase in assaults post-lockouts was described by the authors as "not very substantial".

The report referred to the material decrease in assaults in Kings Cross and the CBD as 43 per month in 2014 against a reported increase at The Star of 1.8 per month post lockouts. The Star questions the use of three different sets of numbers that are used to "indicate" the number of alleged assaults at The Star.

No comparisons are possible between alleged assault numbers for The Star (as per the report) and previously published assault numbers for other NSW licensed venues. This is because different methodologies are used and other licensed venues have opportunities to challenge, review and expunge incidents which are not proved, or for which they are not deemed responsible.

Other licensed venues only have alcohol related incidents published. The BOCSAR report referred to alcohol related and non-alcohol related alleged assaults at The Star.

The Star and the casino regulator - ILGA - agreed, following detailed monthly reviews, that there was a reduction in assault numbers at The Star from 2014 to 2015. The Star reported 64 incidents for 2014 and 52 for 2015. Based on these figures, statistically, there was one incident at The Star for every 211,000 visitors. These ratios should shape any determination on a venue's safety. The Star has always encouraged comparisons with other licensed venues and entertainment precincts.

The NSW Police also confirmed in April that anecdotal evidence suggested a decline in the number of assaults in recent times directly linked to The Star. We would appreciate the opportunity to further discuss the discrepancies between BOCSAR's figures and The Star's figures and any other issue that may arise.

Yours sincerely,

Greg Hawkins

Managing Director - The Star Sydney



RESPONSIBLE CONDUCT OF GAMING AT THE STAR

Introduction

The Star Entertainment Group is committed to best practice in the provision of responsible gambling and has extensive harm minimisation programs which extend far beyond the legislative requirements. According to the *Dow Jones Sustainability Index*, The Star has received recognition as a global leader in the gambling industry and a world leader in responsible conduct of gambling (**RCG**) and in 2015 received a 100% rating. This recognition is tangible evidence of the work undertaken by The Star in regards to harm minimisation.

Executive Summary

1. Responsible Gambling Code

In 2011 The Star developed and launched the Responsible Gambling Code of Practice (RG Code). The intent of the Code is to set the standard and requirements for the whole of The Star to follow in the responsible delivery of gambling services.

The RG Code reflects The Star's underlying values and our commitment to minimising the potential harm associated with gambling and is a single point of reference for the care and expectations of our customers whom we serve and the community in which The Star operates. The Code of Practice was updated in 2013 and is available in seven community languages to reflect the diversity of The Star's members and guests.

2. Responsible Gambling Management Committee

The Star Entertainment Group has introduced a group-wide RG Management Committee that reports to the Board on new responsible gambling policy directions and develops initiatives to further enhance the organisation's responsible gambling practices. This Committee replaced the individual RG Committees which operated at each of the properties. The role of the RG Committee is to administer the RG Code and is responsible for:

- Ensuring there are policies and procedures in place to achieve compliance with this Code within The Star;
- Ensuring there are appropriate training programs in place for The Star's employees in relation to the RG Code;
- Ensuring ongoing evaluation and improvement of the customer care policies and practices;
- Ensuring there are processes for monitoring compliance with this Code, in line with the requirements of the Australian standard on compliance programs;
- Receiving reports on compliance with this Code;
- Investigating any allegation that this Code has been breached, and determining appropriate sanctions for breaches of the Code by employees;
- Ensuring that an independent periodic review of compliance with the Code is undertaken;

- Receiving reports on, and reviewing findings raised from, reviews of this Code; and
- Monitoring developments and research related to responsible and problem gambling.

3. Problem Gambling indicators

The Star Entertainment Group has developed a list of possible problem gambling risk indicators to identify problem gamblers in the casino using observable and reported signs as a training tool for staff. The document was based upon the research conducted by Dr Paul Delfabbro (2007) - *Identifying Problem Gamblers in Gaming Venues* for Gambling Research Australia. Prior to completion of the document Dr Delfabbro was consulted to peer review the list and he provided positive confirmation that our indicators were appropriate for the casino environment.

4. Responsible Gambling Customer Liaison

A full time trained customer liaison representative is available at each of The Star Entertainment Group's properties and is tasked to provide appropriate information and assistance to customers who potentially have gambling related problems, or who are identified as needing to access or be referred to local gambling support services.

In addition, onsite responsible gambling support services operate at the company's properties on a 24-hour basis and are supported by more than 300 Responsible Gambling Liaison Officers (RGLOs), 183 of whom are situated at The Star Sydney, many having bi-lingual skills. Their role is to respond to guests, and their families, who experience difficulties with their own gambling or with that of a family member or friend.

RGLOs complete training courses specially tailored to the casino environment, ensuring our RGLOs have the knowledge and skills to provide assistance and information to guests and/or other team members in the area of problem gambling and related matters. The courses include practical examples and role plays on how to conduct an intervention with someone who is experiencing a gambling related problem. The RGLO team is made from a variety of operational departments across the business and a number of General Managers and senior management from the business have also completed the training and are now trained RGLOs.

Some examples of the kind of situations RGLOs may become involved with include:

- Providing confidential assistance and support.
- Providing information on the relevant support services available (including Gambling Helpline, Gambling Help On-Line, Gambling Help Services and Self-Exclusion).
- Managing distressed customers sensitively, including crisis intervention.
- Acting as a resource/source of information for other staff members relating to customer welfare/behaviour.
- Providing back up support for our three Casino Patron Liaison Managers and documenting any actions taken during their shift.
- Providing additional Responsible Gambling presence within the casino.

5. RG Training for all staff

A Responsible Gambling on-line Refresher Training Course was developed at The Star in 2013. The target audience is all staff at The Star, whether directly involved in the provision of gambling or not. It is made available to all team members through our designated Learning Centres on-site, as well as on line. This course outlines any new initiatives or developments within the Responsible Gambling Department and refreshes the participant's knowledge on the Responsible Gambling Code of Practice. The course is mandatory for all team members and is run bi-annually.

6. RG Awareness for staff

A bi-annual Responsible Gambling Team Awareness Week (RGTA) is conducted at The Star which focuses on supporting the team and promoting awareness for those that work within the gaming industry. A booth is set up back-of-house in the employee dining room and is manned by our Patron Liaison Manager and our RGLOs. Representatives from Gambling Help Services attend to demonstrate our partnership approach to Responsible Gambling. Staff are encouraged to

engage by entering a competition to win prizes. Team Awareness Week aims to provide team members with information, ensuring they know the Responsible Gambling Liaison Officers (RGLOs) and where to get help if needed.

7. Support Services

The Star has engaged *Drake WorkWise* to provide the 'BetCare' gambling counselling service and crisis intervention for Casino customers and staff on a 24/7 basis.

The Star has also entered into Memoranda of Understanding with other Gambling Help Providers:

- LifeLine
- Hope Street
- Auburn Asian Welfare Centre
- Wesley Mission

To assist the Gambling Help Counsellors the Patron Liaison Manager organises guided tours of the Casino for the counsellors. The tour consists of a presentation outlining the company's RCG program, a tour of the casino, followed by a live gaming demonstration of Roulette and Baccarat, which is particularly helpful when counsellors apply cognitive behaviour therapy during their counselling sessions.

8. Voluntary pre-commitment

A voluntary pre-commitment program called "Absolute Assist" was rolled out at The Star at the end of 2012. The Absolute Assist Program offers our guests the option of setting a limit on their electronic gaming machine time and/or spend using their Absolute Rewards cards. This option is part of the Absolute Rewards Program and is offered within The Star Entertainment Group casinos. The Absolute Assist feature can be activated by our guests discreetly at any gaming machine. Our guests nominate the amount they want to set as their daily limit (based on a calendar day from 12am to 11.59pm). The limit/s will then be automatically put on the Absolute Rewards Card. The time and dollar amount are based on active play.

The guest can view their limits in time and dollars at any time from any gaming machine. When the limit is reached the guest will no longer be able to play any Electronic Gaming Machine with their Absolute Rewards Card inserted at the casino where they are playing.

Changing limits - A reduction in the set limit will take effect immediately. An increase in the set limit will not apply for 24 hours. A cooling-off option is available. The guest may nominate 15 minutes, 1 hour, 12 hours or 24 hours. Once selected, the guest will not be able to play the electronic gaming machine with their card inserted, for the period of time selected. While playing, guests are reminded to take a break while playing. A message will appear on the screen (eye level) suggesting the guest take a break.

9. Exclusion Program

The Star Entertainment Group provides information as well as sensitive and timely support to guests who wish to self-exclude themselves from company venues. The Star has also developed a remotely assisted self-exclusion program which enables individuals or their families to exclude (ban) themselves from the casino without attending The Star. In addition, the program was extended to Gambling Help counsellors during 2013 and enables key Gambling Help counsellors to support persons wishing to exclude themselves from The Star, without having to attend a casino property.

10. RCG Research

A percentage of gaming taxes paid by The Star Entertainment Group are directed to community benefit funds. These are allocated, through the relevant state governments, to projects benefiting the community via grants to non-profit community organisations and to research into gambling, the provision of problem gambling services and initiatives designed to reduce problem gambling behaviour in communities. A portion of the tax proceeds is also directed to the National Gambling Help Line and gambling help online services.

In NSW, The Star's funding contribution of 2 per cent of gaming revenue to the Responsible Gambling Fund has meant that more than 50 NSW specific gambling research projects have been commissioned since 1995. It should be pointed out that The Star is the only gaming venue in NSW required to provide funding to the Responsible Gambling Fund. The Star and Lifeline have also signed a Memorandum of Understanding under which they assist each other in promoting responsible gambling. The Star partners with Lifeline, as the 'Diamond Sponsor' of its Sapphire Gala Ball, its major fundraising vehicle.

The Star Entertainment Group has been directly involved in, or contributed to, a number of empirical research projects that seek to further knowledge about responsible gambling and problem gambling in communities across the country, including:

- 'Investigating effective antigambling advertising exploring the role of fear and challenge as a social marketing advertising strategy' by the University of Adelaide:
- 'The use of social media and gambling' by the Centre for Gambling Education and Research, Southern Cross University, University of Adelaide, University of Sydney and McGill University, Canada; and
- Participation in the 5th International Gambling Conference in Auckland, New Zealand (February 2014).

The company has engaged the Centre for Gambling Education & Research, Southern Cross University to complete independent annual Staff Gambling Surveys. The research investigates the gambling behaviour and level of gambling problems among staff to assist the company to ensure provision of a safe working environment, minimisation of gambling-related harm and implementation of appropriate support and assistance for employees and their families.

11. Regulatory oversight of gaming operations

In addition to approving all controlled contracts and approved gaming equipment under the *Casino Control Act*, the regulator is also tasked to approve all gaming machines before they are permitted to operate at The Star. These approvals are decided in accordance with a pre-existing approval regime, which requires, amongst other things, the following:

- Each gaming machine being certified by an accredited testing facility;
- A minimum Return to Player (RTP) of 85%;
- Compliance to relevant clauses of the National Standards (NSW Appendix);
- Compliance with harm minimisation measures outlined in the Casino Control Act; and
- Satisfaction of the responsible gambling safeguards imposed by selected items of the NSW Prohibited Features Register.

The following pages summarise the measures taken The Star in relation to harm minimisation and problem gambling. The summary outlines with regard to each measure whether the action is required by legislation or recommended by other sources or has been undertaken at the initiative of The Star.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
1.	Display of information concerning chances of winning prizes in each part of the casino where gaming machines are located	Casino Control Regulation 21(3) (a)	Signage is installed at all entrances to the casino advising customers "Think! What are the odds of hitting the jackpot? Your chance of hitting the jackpot on a gaming machine is no better than a million to one." THINK! WHAT ARE THE ODDS OF HITTING THE JACKPOT? Vertebors and in the casino. These signs are displayed in all areas of the casino.	New advisory RCG Cards developed and introduced in February 2015 to inform customers of advisory services for gambling concerns and placed on every bank of gaming machines. THINK! ABOUT TOMORROW THINK! ABOUT TOMORROW THINK! ABOUT YOUR CHOICES THINK! ABOUT YOUR FAMILY THINK! ABOUT YOUR FAMILY THINK! ABOUT YOUR FAMILY Responsible Gambling. Bet with your head not over it.
2.	Display of information	Casino Control	Signage in the form of a sticker has been placed on the	Audits are conducted by the Senior Compliance Officer to

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
	concerning chances of winning prizes on gaming machines	Regulation 21 (3) (b) and (4)	left hand facia of all gaming machines containing the words "What are the odds of hitting the jackpot? No better than a million to one". The sticker also incorporates the gambling warning notice and the problem gambling notice.	ensure these are displayed. THINK! WHAT ARE THE ODDS OF HITTING THE JACKPOT? Val classes of filling the judget less opening reaching into accommod from a million to 1999.
3.	Provision of player information brochures	Casino Control Regulation 23	The five brochures in the OGLR 'Think' series are available throughout the casino, at the host desks. In addition, a brochure display unit is situated at each entrance to the casino containing RG related brochures including the English versions of the OLGR 'Think' series, The Star Exclusion and Contact Policy, The Star RCG Code and Star Entertainment Group Responsible Gambling Policy (including Unattended Children) and the Star Child Protection Policy provided as Attachment 1.	The Star has produced a Self-Exclusion brochure, which provides information about the self-exclusion program and is available in 5 community languages. Vietnamese Chinese Turkish Korean Arabic These brochures are available at the same locations as with the OLGR 'Think' series throughout the Casino.

Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
			THINK! FOR GAMBLERS, FAMILY & FRIENDS For information about problem genifery and help options, or 1000186 for visit www.gamblinghelp.new.gov.as Front THINK! About your choices Call Gambling Help 1800 858 858 www.gamblinghelp.nsw.gov.au
			These brochures are provided in the information pack given to customers when their self-exclusion order is issued. A copy of the information pack is provided as Attachment 2 . THE STAR SELF EXCLUSION PROGRAM
			Regular weekly audits are conducted by the VIP Services Operations Manager to ensure availability of brochures and adequate stock of brochures is maintained. Responsible Gambling

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
4.	Provision of player information brochures in community languages	Casino Control Regulation 22	The OLGR 'Think' brochures are available in the published community languages from The Star host desks.	The Think brochures were translated and made available in 6 languages. • Vietnamese • Chinese • Turkish • Korean • Arabic
5.	Dangers of gambling – notice to be displayed on gaming machines	Casino Control Regulation 25	The gambling warning notice and the problem gambling notice are prominently displayed in a sticker format on each gaming machine. The sticker also incorporates the 'Chances of winning' message.	Audits are conducted by the Compliance Department to ensure these notices are displayed. THINK! ABOUT YOUR CHOICES WHAT ARE THE GOOD OF HITTING THE JACKPOTT NO BETTER THAN CALL GAMBLING HELP 1800 858 858. WWW.GAMBLINGHELP.NSW.GOV.AU

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				AND THE STATE OF T
6.	Counselling signage – notice to be displayed in the vicinity of any entrance to the casino	Casino Control Regulation 26	The required counselling signage notice is displayed at each entrance to the casino.	Audits are conducted by the Patron Liaison Manager to ensure are displayed. THINK! WHAT ARE THE ODDS OF HITTING THE JACKPOT? Nor claster of list ray of last on a garding machine as no bother than a machine as no bother than
7.	Signage to be displayed on ATMs and cash- back terminals	Casino Control Regulation 27	The ATM 'Think-line (NSW)' signage is installed adjacent to each ATM throughout the casino complex. The cash back terminals have both the OLGR 'Think' and a notice about the availability of a player activity statement displayed.	In addition, a screen saver on all ATMs provides the contact details for the <i>Think-line</i> (NSW) service. Monthly Audits are conducted by the PLM, Electronic Gaming and Cage staff to ensure compliance.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
			Your player activity statement is available from the cashier	THINK! About your choices Call Gambling Help 1800 858 858 www.gamblinghelp.nsw.gov.au
8.	Display of clocks	Casino Control Regulation 28	The Star has 31 single sided clocks and 8 multi sided clocks installed across the gaming floors. These clocks are positioned so customers playing at the tables or EGMs are able to view them.	The provision for clocks to be present in gaming areas has been included in the STAR Responsible Gambling Policy and this provision goes beyond the legislative requirement for these to be available when playing on gaming machines. In addition, as a further precautionary measure, all of The Star's electronic gaming machines (EGMs) has a clock installed as part of their screen display.
9.	Payment of prize money by cheque	Casino Control Regulation 29	Signage advises customers of the availability of cheque payments for prize money in excess of \$2,000.	Cheques issued for prize money are not redeemable at The Star for 24 hours after being issued.
10.	Requirements relating	Casino Control	All The Star prize-winning cheques are stamped with	These are provided for all for Slots winning cheques.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
	to prize winning cheques	Regulation 31	'Prize winning cheque- cashing rules apply'	
11.	Requirement to keep copy of player activity statement	Casino Control Regulation 32	The Star maintains player activity statements electronically and provides copies to customers upon request.	Your player activity statement is available from the cashier
12.	Prohibitions on gaming-related advertising	Casino Control Regulation 33 Casino Control Act 1992 s70A	The 'Think-line' (NSW) message is incorporated into all casino related advertising. The Star does not publish or cause to be published any casino advertising: (a) that encourages breaches of the law, or (b) that includes children, or (c) that is false, misleading or deceptive, or (d) that is not conducted in accordance with decency, dignity and good taste and in accordance with any relevant advertising code of practice in force at the time the advertisement is published, or (e) that suggests that winning a prize is a likely outcome of participating in gambling activities, or (f) that suggests that participation in gambling activities is likely to improve a person's social standing or financial prospects, or (g) that suggests that a player's skill can influence the outcome of a game that is purely a game of chance, or (h) that depicts or promotes the consumption of alcohol while engaging in gambling activities. The Star 'Advertising and Promotional Review Policy' ensures all promotional activity complies with the prohibitions contained in Regulation 33.	The Star has implemented an advertising compliance system known as 'Law of the Jungle'. All promotional and advertising materials are filtered through this system to ensure compliance with harm minimization obligations and the Think Line is included in advertisements. THINK! About your choices Call Gambling Help 1800 858 858 www.gamblinghelp.nsw.gov.au This system was updated and improved in 2013 to cater for newer forms of electronic advertising used by the Sales and Marketing Department. In addition, the Patron Liaison Manager and Regulatory Affairs Manager submit an RCG Assessment Form for all new Gaming products and promotions for review. New Gambling Products/Services/Procedures/Technology ML/TF and RG Risk Assessment and Approval Form

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
13.	Gaming machine advertising— exclusions	Casino Control Regulation 34	The Star does not display or cause to be displayed any gambling machine related signage unless the sign is located in the casino boundary and this material cannot be seen or heard outside of the casino boundary. Or unless the promotional material that contains an advertisement relating to gaming machines is sent to a member of a membership program established by the casino but only if: (a) the member has expressly consented to receiving the promotional material and that consent has not been withdrawn, and (b) the promotional material contains a statement to the effect that player activity statements are available on request, and (c) the promotional material contains a problem gambling notice (as referred to in Regulation 25 of the Casino Control Regulations), and (d) the promotional material contains a statement to the effect that the member may at any time withdraw his or her consent to receiving any further promotional material, and (e) the promotional material includes information or advertising apart from advertising relating to gaming machines, and (f) the casino operator keeps a written record of the member's consent to receiving the promotional material. The Star has a policy relating to advertising to ensure all promotional activity complies with the exemptions contained in Regulation 34.	The Star has implemented an advertising compliance system known as 'Law of the Jungle'. All promotional and advertising materials are filtered through this system to ensure compliance with obligations. This system was updated and improved in 2013 to cater for newer forms of electronic advertising

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
14.	Prohibition on gambling-related signs	Casino Control Regulation 35	The Casino does not display or cause to be displayed any gambling related signage unless the sign is located in the casino.	As above, The Star implemented an advertising compliance system known as 'Law of the Jungle'. All promotional and advertising materials are filtered through this system to ensure compliance with obligations. This system was updated and improved in 2013 to cater for newer forms of electronic advertising.
15.	Publicity for prize winners	Casino Control Regulation 36	The Star has implemented a procedure to receive and process prize-winner requests not to disclose identity for prizes greater than \$1,000 in value.	
16.	Assistance to patrons	Casino Control Act 1992 s72	At the request of a patron, The Star provides summaries of the game rules and complete copies of the rules are available for inspection upon request. The following information is prominently displayed in the casino: Information concerning the rules of games; Mode of payment of winning wagers; The odds of winning; Minimum and maximum wagers permitted at each table.	INFO 15
17.	Provision of problem gambling counselling services	Casino Control Act 1992 s72A Casino Control Regulation 37	The Star has an agreement with <i>Drake WorkWise</i> for the provision of gambling counselling for customers under the name 'BetCare'. Signs are displayed in each of the areas within the casino containing electronic gaming machines. All customers who self-exclude are provided with an information pack at the time the order is issued, providing information about all NSW based RG Funded Services including gambling counselling, financial and	Drake WorkWise ('BetCare') is also retained by the casino for 24-hour crisis intervention for distressed customers. BetCare also conducts welfare checks of customers when referred by the Patron Liaison Manager. BetCare also conducts gambling assessments for self-excluded customers seeking to have their exclusion orders revoked. The service contracts interpreter services, if required, to assist customers in the counselling and assessment process.

Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
		legal services.	gambling help 2 Online Counselling, information and support, 24 hours a day, 7 days a week
			THE STAR SELF EXCLUSION PROGRAM Contact Drake WorkWise Today Click here or call AU 1300 135 600 NZ 0800 452 521
			gambling HELP ****ONL*** ONL*** ********************************
			Can you lend me some money? Til catch up on the rent next week! I'll only put \$20 in today! Call Wesley Mission 24/7 1300 827 638

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
18.	Provision of credit	Casino Control Act 1992 s74	The Star does not accept wagers by any means other than money chips, or cheque (provided all requirements set out in Section 75 of the Act are satisfied). The Star does not extend credit to any patron in connection with gaming in the casino.	
19.	Provision of gambling contact cards	Casino Control Regulation 38	Each bank of slot machines has a cardholder attached which contains gambling contact cards, so they may be seen from any angle of approach to that bank.	The Electronic Gaming Department conducts a monthly audit to ensure compliance. The checklist used to install these banks of machines also has this requirement. New RCG advisory cards were introduced in February 2015. Correctly and Support Responsible Contacts Responsible Respons
20.	Exclusion of persons from casino	Casino Control Act 1992 s79 (3) Casino Control Act 1992 s79 (1)	The Casino issues voluntary exclusion orders to any people seeking to ban themselves from the casino. All customers requesting to be self-excluded are issued with information packs detailing contact information about problem gambling counselling services. The following 'voluntary' exclusions orders were issued: • 2012 – 221 • 2013 – 203 • 2014 – 194 • 2015 – 235	All self-excluded customers requesting to have their order revoked by the casino, are required to attend a gambling counselling session with either the <i>BetCare</i> or another recognised problem gambling counselling service. A gambling assessment (including a CPGI assessment, Canadian Problem Gambling Index) must be submitted by the counsellor to the exclusion review committee before the request will be considered. <i>BetCare</i> has conducted the following assessments: - 2012 - 69 - 2013 - 78 - 2014 - 88 - 2015 - 90

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
			All customers who self-exclude are encouraged to attend counselling. In 2015, The Star Entertainment Group's Management Risk and Compliance Committee (MRCC) approved the development and release of a company-wide 'Responsible Gambling Policy' and the STAR Exclusions and Contact Policy'	During the period (2012) to (2015), The Star has issued a total of 84 exclusion orders under 79 (1) of the Act for Responsible Gaming purposes to persons who are deemed not to be in control of their gambling and 79 of these orders are still current. Some 856 voluntary exclusions have been issued from 1 January 2012 to 31 December 2015. • Exclusions were also issued to parents for leaving their children unattended: - 2012 – 10 - 2013 – 23 - 2014 – 19 - 2015 – 13 In addition, by way of the Memorandum of Understanding (MOU) with external counselling agencies, exclusions can be arranged off-site from the casino complex. Since this system was introduced on 11 April 2014, there have been 43 exclusion orders issued through external agencies.
21.	Removal of excluded persons from casino	Casino Control Act 1992 s85	The Star removes any excluded person from the casino as soon as they are detected on the premises, in breach of their exclusion order. Since 2012, over 2,300 exclusion-re-entries have been detected, as set out below. 2012 – 627 2013 – 619 2014 – 617 2015 – 758	An incident report is created for each breach of an exclusion order issued under section 79(3) of the Act. A letter is generally sent to each person who has breached the order, reminding them that the order is still in place and providing them with details of problem gambling counselling services. In addition, once an excluded person has been identified by The Star as a 'serial re-offender' for breaching their exclusion order, the person's photo is placed on the notice board in the Security and Surveillance secure areas noting them as a 'person of interest'. This is to assist staff in preventing that person from attempting to enter the casino.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				If The Star receives information from a family member concerning the re-entry into the casino of any excluded person this patron is added to The Star Exclusions Hotlist and both Security and Surveillance are advised to look out for the patron and the person's photograph is circulated through the Security Muster Briefings.
				When an excluded person is detected in the casino, an updated photo image is taken by Surveillance and added to the customer's CID file.
				Further details of the manner in which The Star detects excluded persons who seek to enter the gaming areas of the casino are provided in response to Question 25.
22.	Conduct of gaming	Casino Control Act s70	The Star does not allow its employees or agents to induce persons outside the casino to enter the casino or take part in gaming in the casino.	
23.	Gambling Inducements	Casino Control Regulation 20	The Star does not offer or supply any free or discounted liquor as an inducement to participate, or to participate frequently, in any gambling activity in the casino. The Star does not offer free credits to players. The Star does not use letterbox flyers, shopper dockets or any similar advertising material to induce people to become gaming machine players.	The Star has implemented an advertising compliance system known as 'Law of the Jungle' All promotional and advertising materials are checked through this system to ensure compliance with obligations Internal Control audits are conducted of this process and report any breaches of the Policy are reported through the MRCC.
24.	Minors	Casino Control Act 1992, s 93 and 98	The Star restricts access to the casino by minors and requires the provision of identification at entrances by any person who appears to be 25 years of age or younger for this purpose. At each entry to the casino there is a notice advising that persons under 18 years of age are not permitted to access the casino. This is complemented by signs requiring identification for patrons appearing to be 25	The issue of minors entering the Casino is treated seriously and internal training conducted emphasizes the importance of preventing minors from entering and regarded as being a serious RCG issue.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
			or under.	Prescribed acceptable forms of identification are: Current motor vehicle drivers or riders icence, or permit issued by the Roads and Martine Service (RMS) - previously the Roads & Traffic Authority (RTA) - or interstate or overseas equivalent. NSW Photo Card issued by RMS Current passport issued by the Commonwealth or corresponding authority in another country. Current proof of age card issued by an interstate authority.
25.	Unattended children	Ministerial Direction to exclude the parent of any child left unattended at The Star. No legislative requirement	The Star's Security Department issues exclusion orders to customers who are believed to have left children unattended on the premises in breach of The Star's policy. Non-voluntary exclusions were issued for leaving children unattended as set out below: • 2012 – 10 • 2013 – 23 • 2014 – 19 • 2015 – 13	Signage at all car park entries and on light boxes in the lift lobby areas of the car park on levels 2, 3, 4 and 5 advises patrons not to leave their children unattended in the car park or throughout the complex. The signage advises that any customer who leaves a child unattended will be excluded. The Star has produced a brochure which is widely available throughout the complex, including the host desks, the hotel and apartments, and the wall of pamphlets (in English and three community languages) reminding parents not to leave their children unattended. ECHOENTERIAINMENT OF Please don't leave your kids unattended.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				Internal control procedures are in place for Security to regularly patrol The Star's car parks. More warning signage was added to the car park in 2014.
				The issue of unattended children is addressed as part of The Star's Responsible Gambling Policy and The Star's Child Protection Policy.
26.	Training courses for employees	Casino Control Act 1992 s 64 (1)	The Star developed a Responsible Conduct of Gaming (RCG) training package, incorporating an on-line component and a classroom assessment. The course was initially approved by the Casino Regulator in September 2001. In May 2006, the Casino Regulator approved the revised course. In 2010 the Casino ceased approving The Star's training courses. The RCG course was revised in 2010 and again in 2015. Where required, employees mandatorily complete a refresher-training course in RCG every two years.	In addition, The Star (where required) ensures all staff who have direct contact with customers in the on-line LMS Responsible Conduct of Gambling (RCG) course.
				All staff then undertake the RCG refresher-training course every two years.
				The Patron Liaison Manager also conducts additional RCG training for senior Gaming staff as required and provides input into the Responsible Gaming Liaison Officer course.

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				THE STAR Responsible Gambling Workshop Bonnie McKenzie Principal Psychologist March 27, 2014
27.	Staff gambling prohibition	Casino Control Act 1992 s 86 (2)	Persons employed in the casino as special employees (as defined in Part 4 s 43 of the Act) are not permitted to gamble in the casino.	All staff are required to accept the Star Code of Conduct as part of their employment contract. The Star Code of Conduct prohibits staff from The Star Sydney from taking part in any gaming or wagering at The Star whilst employed by The Star, whether or not they are on duty. Disciplinary action is taken against staff for breaches. The Star Employee Gambling Policy, last updated in 2014, is provided as Attachment 6.
28.	The Star Responsible Gambling Policy and Responsible Gambling Code.	No legislative requirement	Staff training through LMS.	Star developed The Star Responsible Gambling Policy and The Star Responsible Gambling Code, which was updated in 2014, and 2015. The Code requires The Star to meet self-imposed standards in the following areas: - Customer Assistance and staff training; - Support services; - Self-exclusion; - Customer care; - Co-operation with Problem gambling services; - Responsible Gaming Register;

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				- Provision of player information;
				- Playing environment;
				- Responsible Communication and Review of compliance.
				Copies of The Star Code are provided as part of Attachment 4.
				THE STAR RESPONSIBLE GAMBLING CODE
29.	The Star Responsible Gambling Committee	No legislative requirement		The Star Entertainment Group has a Responsible Gambling Committee, which is scheduled to meet on a bi-monthly basis.
				The Committee comprises of the following permanent members from each casino property:
				A. Managing Director
				B. GM Marketing
				C. GM Table Games
				D. GM Electronic Gaming
				E. GM VIP Marketing Domestic
				F. General Counsel
				G. Director VIP Services
				H. Patron Liaison Manager
				I. Community Engagement Manager
				J. Regulatory Affairs Manager
				The Responsible Gambling Committee provides stewardship of the responsible service of gambling across all of The Star Entertainment Group's properties, through:
				Governing policy and applicable supporting processes/procedures (such as checklists completed for new products and services) to achieve industry best practice;

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				2. Staff training to ensure awareness of responsible gambling policy requirements;
				3. Monitoring responsible gambling activities and other initiatives to ensure compliance with Group policy and mitigate business impacts arising from regulatory and other external developments that may impact responsible gambling obligations and initiatives; and
				4. Exchange information on persons of interest that may frequent more than one Star property.
				(Attachment 7)
30.	Patron Liaison Manager	No legislative requirement	Provides a Patron Liaison Manager. ('PLM') (Position Description as Attachment 9	The Patron Liaison Manager is responsible with the Executive General manager Governance Risk and Compliance for the policy and development of RCG initiatives and is the key contact for counselling services. The Patron Liaison Manager is normally the primary contact for customers and family members in relation to Responsible Gambling and self-exclusion issues, although customers can also seek assistance through Security, Gaming staff or RGLOs.
31.	Responsible Gambling Awareness Week	No legislative requirement		The Star commenced an RG Awareness Week for staff in July 2004 with the purpose of of increasing staff awareness of Responsible Gambling. The Star has conducted an RG Awareness Week each year in 2012, 2013, 2014 and 2015. Responsible Gambling

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
32.	Responsible Gambling Liaison Officers	No legislative requirement		The initial training of Responsible Gambling Liaison Managers (RGLMs) commenced in December 2005. This has been replaced by the Responsible Gambling Liaison Officers' Course in 2013, which is now delivered by qualified external agency being 'BetCare'. Since inception, 8 courses have been conducted for Gaming, Management and Security staff and 191 trained RGLO have been trained since 2012. Goals for this workshop
33.	External Review of The Star's compliance, risk and fraud control.	No legislative requirement		In February 2013, 2015 and 2016, The Star engaged Neil Buck and Associates to review The Star Entertainment Group's Compliance, Risk and Fraud Control Framework. The principle objectives of the review were to obtain an independent understanding of: the effectiveness of The Star Entertainment Group's overall governance, risk and compliance framework in delivering sound compliance practice by application of AS/ISO 31000, Risk Management, ISO 10002, ISO19600 Compliance Programs. In summary the finding of this Review were: "The Star Entertainment Group has a suitable governance, risk and compliance framework, a competent compliance team and a commitment to compliance from the Board and Executive. On

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				this basis we concluded that it is likely that the organisation and its managers and staff understand their obligations and have systems and process that will ensure that for the most part the obligations are met."
				A copy of the Reviews undertaken by Neill Buck and Associates in February 2013, 2015 and 2016 were previously provided at Attachment 2.
				Also in 2015, Internal Control was required to conduct an assurance audit of RCG compliance. (Attachment 2).
34.	NAMB Screen Message- Take a break	No legislative requirement.		This message has appeared on The Star electronic gaming machines (i.e. 'How long since you had a break') as an effective RG message to prompt patrons to consider taking a break from play.
				This message was first displayed in May 2011.
35.	New Product / Service RG Checklist	No legislative requirement		The Star requires that all new products and services are reviewed and a risk assessment is undertaken to determine and manage the RCG impact of all products or services to be introduced. A copy of the checklist is provided as Attachment 8 .
36.	Electronic Gaming Products	No legislative requirement.		In June 2008, a Ministerial Direction was issued relating to The Star stating that there should be a presumption in favour of approving gaming equipment where that gaming equipment has been approved for use in a Casino in another jurisdiction with a similar level of regulatory controls to those applying under the Casino Control Act.
				In its discussions with The Casino Regulator, The Star agreed not to seek approval for gaming equipment available in other similarly regulated jurisdictions unless it satisfied the following requirements:
				1. A minimum return to player ("RTP") greater than or equal to
				85%; within a single game variation or configuration,

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				2. A change to betting options selected that causes a change to the resultant RTP of more than 6% will not be permitted;
				for games that have bet level eligibility requirements to win a jackpot feature, RTP differences of greater than 5% between eligible and non-eligible bets will not be permitted;
				3. Games with an RTP for non-qualifying bets (i.e. bets which do not qualify for the jackpot) of less than 85% will not be permitted;
				4. Auto-initiation of Game Play will not to be permitted;
				5. Auto-play (i.e. the automatic play of a machine initiated by pressing a single button with no further interaction required for the game to continue) will not be permitted;
				6. Player inducement messages will not to be permitted;
				7. Graphics displaying legal tender will not be permitted;
				8. Inappropriate button layout (i.e. utilising maximum bet buttons in a manner which is inconsistent with normal domestic gaming machines) will not be permitted; and
				9. Games that give a false expectation of better odds by falsely representing any occurrence or event will not be permitted
37.	Time Spent Gambling policy developed	No legislative requirement		Following a recommendation from the 2006 Casino Licence Review, a working group was set up to review the literature and

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				research in relation to time spent gambling.
				Further development was undertaken by the Patron Liaison Manager for Jupiter's (Gold Coast), to develop a manual 'Extended Play Data System' in 2013.
				This was further enhanced by The Star Entertainment Group's IT Department in February 2014, and integrated into the <i>KCMS</i> as an automated alert system, which records when a player reaches 24 hours play.
				The player is then approached and required by a Gaming Manager to take a break for a minimum of 8 hours and up to 24 hours depending on circumstances. An Incident Report is then generated to monitor repeated instances.
				This system has been very successful and since an automated alert system was introduced some 216 interventions have occurred.
38.	ATMs are not located within designated gaming areas or on the same floor as gaming	No legislative requirement		No ATMs are located within designated gaming areas of The Star. In addition, ATMs within the The Star complex are located on the ground floor of the Hotel. Gaming areas are located on level 01 and above.
	areas			This measure encourages those patrons seeking to withdraw money from an ATM to take a break by leaving the gaming areas and travel to a different floor.
39.	Crisis Intervention Protocol	No legislative requirement		A protocol was developed by the Patron Liaison Manager and BetCare to assist RGLO's in the process for contacting the crisis intervention service.
				In 2012, the Patron Liaison Manager conducted a familiarisation tour for all the <i>BetCare</i> Counsellors and the Patron Liaison Manager gave a presentation on how the RCG program works in practice, as well as Gaming demonstration.
				A copy of the <i>BetCare</i> protocol is provided as Attachment 9.
40.	Participation in the	No legislative		The Patron Liaison Managers attend the yearly annual

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
	National Association of Gambling Studies	requirement		conference of the National Association for Gambling Studies. NA NATIONAL ASSOCIATION FOR DAMBLING STUDIES INC. ON THE PROPERTY OF THE PARTY OF THE
41.	Conflict resolution training for Security staff (Managers and Supervisors)	No legislative requirement		CRTC (Melbourne) conducts courses each year for Security staff in 'Manage Conflict Through Negotiation' and 'Advanced Customer Aggression Management' courses for Security staff and Management. Conflict Resolution Training Consulting Workshops' and Conflict Resolution Training Services have training, The Star staff in Negotiation and Crisis Intervention. Verbal De-escalation Training Exercise Security in any particular deaths training of the service and th
42.	The engagement of Southern Cross University to conduct a study in relation to gambling practices of The Star employees	No legislative requirement		In each year since 2011, The Star engaged Southern Cross University to conduct a survey of employees of The Star to investigate the gambling behaviour and level of staff gambling issues. A copy of the final report issued on 1 June 2015 in respect of findings about gambling practices of The Star employees is found at Attachment 3 . General observations was that Star employees of The Star generally: - 'engaged in gambling on an infrequent basis'

	Measure	By Legislation	How The Star meets requirement	Voluntarily / Additional Measures
				least a fortnightly basis. - 'Most gambling by employees was on lottery and sporting wagering' - 'The majority of employees appear to gamble at moderate frequencies and spend moderate amounts per month'.
43.	Monthly reporting to Casino Regulator regarding RCG	No legislative requirement		The Patron Liaison Manager provided a monthly report of RCG activities to the Casino Regulator up until January 2015. The reports provided information relating to RCG related incidents; the numbers of voluntary exclusion orders issued; the number of referrals to <i>BetCare</i> for gambling assessments RCG training activities conducted, and any other RCG related activities of note (e.g. RCG Awareness Week and participation on external conferences and forums etc).
44.	Compliance with the Australian Government Department of Social Services - Harm Minimisation Interstate Comparison Table	No legislative requirement		The Star complies with all relevant harm minimisation areas highlighted within the Harm Minimisation Interstate Comparison Table. (Attachment 10)



ADDITIONAL SECURITY AND SURVEILLANCE MEASURES SINCE 2014

The Star has always adopted a zero tolerance approach to any anti-social behaviour. The security and surveillance measures implemented at the Star including the use of the latest surveillance technology are industry leading. The additional measures implemented since the introduction of the lockouts in the CBD and Kings Cross in 2014 are outlined below.

Leadership

- An additional security duty manager has been introduced to the roster to assist with floor management on Saturday nights and from 1 July this will occur on Friday nights as well.
- An additional 4 security supervisors have been added to the security team on Friday and Saturday nights to enable a direct supervision of all staff.

Entry Points to the casino

- 5 additional security officers are stationed at the entry points to the casino, to perform a shift from 9pm to 5am. They are stationed at the two main entry points at Harbourside (Pirrama Road side) and the Porte Cochere (Pyrmont Street side) and their core function is to identify RSA issues and deal with undesirable groups.
- 2 Welcome Team leaders have been implemented on the main entry points on Friday and Saturday nights, thus ensuring a faster response time to critical decisions allowing for greater control at the entry points.

Pro-active Security

- On Friday and Saturday nights, 2 external rovers commence shift at 9pm to 5am and an extra 4 commence at 11pm to 5am. These officers roam the perimeter of the complex, to assist with patron safety and identify large undesirable groups and RSA issues prior to their attendance at the casino entry points. These rovers will report groups / individuals to the entry points to prevent their entry to the casino. This team also assist with guests who are asked leave and ensure they leave the property.
- A dedicated security console operator is in place to complete a camera sweep of the casino gaming floor and casino precinct to assist with identifying any groups or individuals that are undesirable or are at risk of reaching a state of intoxication.

- A proactive safety team has been implemented on Friday and Saturday nights from 11pm to 8am. This team consists of 4 of the best safety security officers and a security supervisor. These officers proactively monitor the main gaming floor looking for any undesirable activity.
- On a Friday and Saturday night 2 covert security officers are placed on the proactive safety team for the 11pm to 5am shift, tasked specifically with performing roving duties throughout the casino property. They are tasked primarily with identifying RSA issues and undesirable groups. Part of this teams rove sectors are the bathroom areas where they look for illegal activity such as substance abuse.

Bars

- The finish time for security officers on static duties inside bars has been extended on Friday and Saturday nights from either 1am or 3am, to 5am and 8am.
- A glass pick up strategy by security officers has been implemented to assist with identifying intoxication.

Casino Precinct Safety

- 5 extra security officers have been allocated to the taxi rank on Pirrama Road and Porte Cochere from 9pm and 11pm to 5am on Friday and Saturday nights.
- Contract security staff have had their shifts extended from 3am to 6am on Friday and Saturday nights to perform metal detection and crowd control duties.
- Use of metal detector scans has been increased on Friday and Saturday nights.

Training

- The Security Training Co-ordinator has facilitated the co-ordination of RSA and ID vetting training for all Welcome Team and Safety Team officers. This now occurs on a monthly basis.
- All advanced safety courses occur monthly to ensure all officers complete the course and officers are required to complete a refresher course every 2 years. These courses, which are provided by registered training providers, include the following:
 - Advanced conflict JPR Training and People Solutions
 - o Drug awareness Drug and Alcohol Research and Training
 - Verbal conflict resolution Conflict Resolution Training and Consulting
 - o Human Behaviour course (influencing and identifying suspicious behaviour) BTAQ Consulting
- Shift supervisors provide safety team officers with Outlaw Motor Cycle Gang information at briefings as new intelligence becomes available.

Logistics

Security officers carry and utilise department issued LED/UV torches to assist with authenticating identifications produced by patrons wishing to gain entry into the Casino.



CONFERENCES AND ENTERTAINMENT AT THE STAR

The Star Event Centre

Built on the rooftop of The Star with views over Sydney Harbour and the city skyline, the \$100 million Star Event Centre has hosted many exciting and elaborate A-list events including the AACTA Awards, the X-Factor auditions, the World War-Z premiere and the ARIA Awards.

Multi-use in every sense, The Star Event Centre has varying capacities for each function type including up to 980 for banquets, 2,000 for cocktail receptions and 3,000 for theatre style events which can be broken down into two sides each with a capacity of approximately 600. A separate meet and greet room can hold 110 for theatre style set ups. The 1,077 square metre column-free space also offers pre function lobby space for up to 800 guests. The banquet area is the largest space located in a hotel in Sydney, ideal for gala dinners and award ceremonies.

The Star Event Centre hosted 353 events in the calendar year 2015, and welcomed 186,000 guests who attend these events. Break down as follows:

- 128 banquet lunches/dinners
- 47 conferences
- 41 red carpet/special events
- 40 concerts
- 36 internal events
- 33 cocktail functions
- 14 conferences with dinner and/or cocktail functions
- 14 meetings

The Star Event Centre kitchen prepared more than 120,585 fully-plated meals (not including cocktail or pre-event functions).

Across the property, The Star held more than 800 functions across our event spaces for the 2015 calendar year. *A full list for 2015 is attached.* Highlights events included:

- The Australian Academy of Cinema and Television Arts (AACTA) Awards,
- Victor Chang 20th Anniversary Ball;
- Dally M Awards;
- World Business Forum;
- Australian Olympic Committee "One Year to Go" Appeal Dinner;
- Australian Recording Industry Association (ARIA) Awards;
- Tesla Australian Launch;
- · Miss Australia Chinese Pageant;
- EY Entrepreneur of the Year Awards;
- Emerald Ball; and
- The Sony Foundation Gala.

In 2016, entertainment staged so far include:

Quentin Tarantino Laugh Your Pants Off

Chinese New Year Gala 2016

Making A Murderer

Tom Jones Karen Mok

Air Supply
Josh Altman

Li Jian

Billy Crystal

Human Nature

Na Ying Chris Isaak

Sammi Cheng The Ten Tenors

Celtic Thunder

Laugh Your Pants Off

Charlie Sheen

Sydney Darts Masters Guo Degang & Yu Qian

The Sydney Lyric at the Star

The Sydney Lyric at The Star is a 2,000 seat theatre owned and operated by the Foundation Entertainment Group since 2011. It has its own liquor licence and has staged popular productions such as West Side Story, Oliver, and Phantom of the Opera. It opened in 1997.

The Lyric has also provided a temporary home to music performers including Bon Jovi, Elton John, Stevie Wonder, Julio Iglesias and Tony Bennett. The Lyric theatre is known for its venues and events and its ability to offer individuals of all ages the best in entertainment.

Some figures from more recent performances are set out below:

- Matilda: 28 July 2015 28 February 2016. Average 8 shows per week
- Rocky Horror Show: 11 April 7 June 2015. Average 8 shows per week
- Dirty Dancing: 28 November 2014 22 February 2015. Average 8 shows per week
- Strictly Ballroom: 25 March 5 October 2014. Average 8 shows per week

Please note these figures are to be taken as commercial – in – confidence and are not for publication.

All performances at The Lyric are listed below:

2016	Matilda, We Will Rock You, Singing in The Rain
2015	The Rocky Horror Show, Le Noir - The Dark Side of Cirque, Thriller - Live.
2014	Strictly Ballroom (world premiere), Dirty Dancing
2013	War Horse, Hot Shoe Shuffle, Blue Man Group, Grease
2012	Legally Blonde the Musical (Australian premiere). An Officer and a Gentleman (world premiere), Frankie Valli & the Four Seasons
2011	Annie (2011–12), Richard III starring Kevin Spacey, Elton John Live, An Evening with Al Pacino, Stevie Wonder Live, Hairspray, Doctor Zhivago (world premiere)
2010	Cats, West Side Story
2009	Mamma Mia, Chicago, Buddy
2008	Priscilla Queen of the Desert (return), The Phantom of the Opera, Shout
2007	Miss Saigon
2006	Priscilla Queen of The Desert (world premiere 2006-07), Dusty
2005	The Producers
2004	We Will Rock You (2004–05), Lisa Marie Presley, Cirque Dreams, Shanghai Circus,

	Sleeping Beauty on Ice, Saturday Night Fever
	The Lion, the Witch & the Wardrobe
2003	Mamma Mia, Oliver, Pirates of Penzance
2002	
2001	The Wizard of Oz, Hale and Pace, Singing in the Rain, Michael Ball, Petula Clark
	Annie, Tony Bennett, Jerry Lewis, Al Jarreau,
2000	Peter Ustinov
1999	Merry Widow, Geraldine Turner, Kamahl, Adam Brand, Popcorn, Tony Bennett, <i>The</i> Sound of Music
1998	Julio Iglesias, <i>An Ideal Husband</i> , <i>Show Boat</i>
1997	Michael Crawford, Natalie Cole, Peter Paul and Mary, Elisa Chan, Kenny Gee, K.D.Lang, Air Supply

Marquee

In April 2012, The Star reinforced its status as one of the premier entertainment venues in Australia by opening Marquee nightclub in Sydney. Marquee Sydney is the third nightclub in the Marquee network after Marquee New York and Marquee Las Vegas. These award-winning nightclubs have built an undisputed reputation as the venue of choice for music lovers and celebrities alike, with major line-ups of local and international artists week after week.

Calvin Harris, Drake, Avicii, Tiesto, Hardwell and Armin Van Buuren are just some of the top tier artists that have appeared at Marquee Sydney and kept it at the forefront of international dance music. Marquee has redefined the standard of hospitality in Sydney, and has established itself as the number one celebrity party destination in Sydney. Key to this is Marquee's legendary VIP table and bottle service that is unique to Marquee, including rigorous RSA standards.

Marquee regularly plays host to high profile stars from entertainment and sport with an extensive list of distinguished visitors over the past three years. Some of the names to have enjoyed Marquee's world renowned hospitality include:

- Leonardo DiCaprio
- Jamie Foxx
- Justin Bieber
- Miley Cyrus
- Adam Lambert
- Chase Crawford
- Jennifer Hawkins
- Jason Day
- Tim Cahill
- Ian Thorpe
- James Harden

- Usain Bolt
- One Direction
- Paris Hilton
- Geoffrey Rush
- Cate Blanchett
- Ricky Martin
- Naomi Campbell
- Adam Scott
- Jarrod Hayne
- Bernard Tomic
- Tottenham Football Club

Rock Lily

Rock Lily is a live music venue situated on the main gaming floor of The Star. Big international acts and local bands line up to play. On average Rock Lily hosts between 20 and 25 local acts a month, as well as encouraging young talent by staging the Clash of the Bands in August and September and Monplay on Mondays where student bands are encouraged to present their musical skills. On Fridays and Saturdays, DJs provide entertainment after 12am as well as on Sunday nights. Aside from music, Rock Lily also hosts a monthly comedy night as well as trivia nights during the year.

Please see attached a sample of bands playing at Rock Lily.





