



CROWNBET PTY LTD – PROPOSED MANAGEMENT PLAN IN ACCORDANCE WITH CLAUSE 6 OF THE GAMBLING CODES OF PRACTICE NOTICE 2013

CrownBet Pty Ltd (**CrownBet**) seeks to replace the below variable requirements the alternative solutions outlined on the basis that we consider that when viewed as a whole, these measures are at least the equivalent of the variable provisions.

Clause Reference	Variable Requirement	Proposed Variation	Reasons that the Proposed Variation compensates for the Variable Requirement
<p>Clause 21(1)(b) Plugs on Radio</p> <p>Clause 22(1)(b) Plugs on Television</p> <p>Clause 22(1)(c) Celebrity Commentary</p>	<p>In the case of a plug, the gambling advertisement must end with the condensed warning message and that national gambling helpline number 1800 85 858.</p> <p>Gambling advertising on television in the case of celebrity commentary—must include the person expressly or impliedly representing the gambling provider mentioning the national gambling helpline number 1800 858 858 and the need to gamble responsibly.</p>	<p>All ‘celebrity commentary’, pre-recorded market updates, panel or any other mention of CrownBet’s products or services on radio or television will include mention of the Condensed Warning Message at least once by one individual in each segment.</p> <p>In circumstances where multiple segments occur within a program, the substitute requirement will be met by at least one individual at the end of each segment or at least once per 30 minutes (on average).</p> <p>Whilst CrownBet will use its best endeavours to ensure the Condensed Warning Message is referenced, the requirement will not be breached where the commentary is cut off or otherwise excluded by broadcaster.</p>	<p>Given the nature of these crosses the majority of which re live, the inclusion of the national gambling helpline number is likely to be impractical in many situations. Accordingly, in some circumstances CrownBet’s representative may be unable to include the relevant message.</p> <p>In order to address this risk, all representatives will be carefully trained and counselled to ensure that the message is delivered where practicable.</p> <p>We are of the view that the proposed variation ensures that the warning message will be given the appropriate respect and air-time, rather than causing the message to be rushed in order to comply. We also consider the Responsible Gambling television commercial (proposed below) ensures that viewers are exposed to the key elements on the responsible gambling message.</p>
<p>Clause 22(1)(d)</p>	<p>Gambling advertising on television in the case of the</p>	<p>Where CrownBet's logo forms part of physical signage for a television broadcast, we proposed</p>	<p>It is CrownBet’s view that this clause does not apply to physical signage, however, we include</p>

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<p>Logo on television screen</p>	<p>presence of a logo on screen (other than as part of a television commercial which includes a mandatory warning message)—must include the placement of the condensed warning message adjacent to the logo, occupying no less space than that occupied by the logo.</p>	<p>that the variable requirement not apply.</p> <p>Where CrownBet’s logo is placed digitally on a television broadcast, we propose to include the Condensed Warning Message in close proximity to the relevant logo, dependent on the space available and they layout of the screen as dictated by the relevant broadcaster. In circumstances where it is practicable, CrownBet proposes to include the Expanded Warning Message on the same screen in place of the Condensed Warning Message.</p>	<p>this variable requirement for the sake of certainty. If this is not accepted, we rely on the alternative requirements contained throughout this Management Plan as suitable alternatives.</p> <p>We do not consider that by not appearing “adjacent” to CrownBet’s logo that the Condensed Warning Message would have any less impact. The use (where practicable) of the Expanded Warning Message provides further information and has a greater impact than the Condensed Warning Message.</p>
<p>Clause 22(2) Television Advertising</p>	<p>Gambling advertising on television must include a mandatory message that occupies at least 25% of the screen for one-sixth of the advertisement or the whole screen for one-tenth of the advertisement. The message must be spoken in a neutral tone at the same time it appears on screen.</p>	<p>CrownBet proposes to substitute the requirements in clause 22(2) by running a dedicated responsible gambling television commercial (Responsible Gambling TVC) on each day that it broadcasts other television commercials in South Australia. The Responsible Gambling TVCs will run only on free-to-air television networks (including secondary channels) on which CrownBet broadcasts advertising. This will ensure the responsible gambling advertising is broadcast to the target group of the CrownBet advertising.</p> <p>The Responsible Gambling TVC will constitute 10% of all television advertising conducted by CrownBet in South Australia at all times.</p>	<p>We are of the view that the Responsible Gambling TVC will have a greater impact from a responsible gambling perspective than the requirements in clause 22(2). The Responsible Gambling TVC will be a dedicated and segregated communication from CrownBet that does not reference any wagering products or services and is therefore better placed to deliver the warning message.</p> <p>The Responsible Gambling TVC represents a significant investment by CrownBet, which will ensure that it has a broad reach into South Australia.</p> <p>Further, we propose to screen the Responsible Gambling TVC to channels on which CrownBet has</p>

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		<p>The Responsible Gambling TVC will describe elements of CrownBet’s responsible gambling program, including the ability to make use of our voluntary pre-commitment tools. It will also make clear references to where people can obtain specialised support services, the national gambling helpline number 1800 858 858 and will encourage people to consider not only themselves, but those people around them.</p> <p>The responsible gambling message will be unbranded and clear in its delivery.</p>	<p>run other advertising. We consider this is an effective mechanism to ensure that the segment of the population exposed to our advertising is also in a position to view the Responsible Gambling TVC.</p> <p>All of CrownBet’s other commercials will otherwise comply with the Code and also meet the standard imposed by all other state based gambling regulators around Australia.</p>
<p>Clauses 31 and 32 Text Messages</p> <p>Clause 44 Direct customer communications</p>	<p>Gambling advertising which is a text message must be concluded with the condensed warning message (and the national gambling help number where > 16 characters)</p>	<p>Alternatively, and in order to have a more genuine impact on the promotion of responsible gambling, CrownBet proposes that:</p> <ul style="list-style-type: none"> • 2 social media posts per day are to be devoted to promoting responsible gambling features available on CrownBet’s website as well as approved gambling help providers. • Those posts will be made once in the afternoon (between 12.00PM and 5.00PM) and once in the evening (between 7.00PM and 11.00PM) on the basis that these periods accord with the peak time for CrownBet’s social media posting activity. 	<p>The requirement to include warning messages/phone number is overly onerous across platforms such as Twitter/Facebook and SMS communications to customers.</p> <p>Given the limited space, we do not consider that the message will have the desired impact.</p> <p>Accordingly, we consider that dedicated postings and links provide CrownBet with a further opportunity to engage directly with its customers on the matter of responsible gambling.</p>



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		<p>All material that is controlled by Betfair and linked to via social media posts will contain a link to responsible gambling pages where information and support is readily available.</p> <p>We confirm that all other electronic communications will contain all mandated information (including those communications covered by clause 44 that are not SMS messages.</p>	