

Operations Manual

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1) Company Vision & Values

“To provide the best low stakes gaming experience in each location we operate and become the venue of choice for the locals wishing to gamble responsibly.”

Values

1. Safe, Fun & Compliant – We listen and engage with our customers making sure that they enjoy their time with us and gamble responsibly.

2. Proud of Our Service – We aim to deliver the best in service, working proactively with our colleagues and customers to get better every day.

3. Teamwork – Proactively sharing ideas, knowledge and trends with each other to make our business better.

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2) Promotions

The Cash Match Register and Freeplay Register can be found in the Appendix.

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3) Floats & Cash

Machine Floats

TITO Machines – Procedures with TITO machines regarding MARS System - refer to Mars Manual.

Each machine will have a machine float certificate inside for levels of floats for non-TITO Machines.

Cash and Money Handling Procedure

If and whenever you are involved in financial transactions with customers, you must ensure that you comply with the Company's procedures. Please ensure that you check the amount tendered and provide customers with the correct change.

Discrepancies

Where discrepancies arise employees who are on duty at the time will be responsible for the reimbursement back to the company. It is therefore essential that you take responsibility for the careful handling of company cash. Where shortfalls are deemed to be through negligent or dishonest behaviour, the company reserves the right to investigate and issue disciplinary action as appropriate.

Handling Cash

Two persons must be present with the cash at all times, during collection, counting and banking of the cash.

Recording Cash Transactions

You must ensure that accurate recordings are made on the company paperwork for monetary transactions. All transactions must be recorded on the proper documentation. Any shortfall must be reported

Daily Float Checks

Employees responsible for the shift is required to carry out float checks with the relief person taking responsibility on the following shift. All float checks safes must be completely recorded on the relevant forms and signed and dated by both.

The Daily Float Check sheets can be found in the Appendix.

Float checks must be performed daily for each shift and recorded and logged in a folder at all times. The person performing the task are responsible for the safe keeping of all the recordings.

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End of the week float checks

Shop Managers / Machine Collectors are required to carry out an end of the week float checks on all Safes prior to starting the end of week collection. Float checks must be completed on the end of week float form then signed and dated by the Shop Manager / Collector.

The End of the week float check sheets can be found in the Appendix.

This is to be printed and completed manually, then signed before all data is transposed onto the electronic version. The electronic version can then be uploaded and saved as an ongoing record of hours worked.

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4) Management Procedures - Change Machines GEWETE

- a) The floats that are held within change machines must be counted and balanced at least twice per week. One at the end of week and once when machines are emptied.
- b) Change machine checks must be recorded on the change machine spot check form which must be signed and witnessed by the manager.
- c) Only do a single float check at a time so as not to be distracted or mix cash floats up.
- d) All and any cash taken from the change machine must be counted in the locked office. It is recommended this is done prior to start of trading or at the end of trading.

Cash Security Guidance

Certain measures must be taken to ensure that the cash is kept secure and that we don't invite opportunist theft or place our staff in excessive risk within our venues.

The following procedures must be followed at all times.

- i. The Office door must remain locked at all times. The safe door and office door must never both be open at the same time and no cash should be left unsecured within the office.
- ii. Cash should always be handled discreetly and wherever possible out of view of customers.

Hand Pay Procedures and Processes

A hand pay is the process where a slot machine is programmed not to pay the customer without verification of the win by a manager. This will require the manager / floor staff to pay them by hand. The hand pay process is used in coin in coin out systems and not those with the latest TITO technology fitted. It is used in the following ways:

- 1. Coin jams
- 2. Inadequate supply of coins in the machine's hopper to pay the requested amount
- 3. Problems with the coin out mechanism
- 4. A large win which results in too many coins to be paid out by the machine

In order to perform the hand-pay the manager needs to complete the hand pay record sheet which can be found in the Appendix

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5) Operating Standards

Daily Checklist & Cleaning Process

- a. The Check lists are designed to organize your daily tasks and to verify your most important tasks. The aim of this is to ensure consistency and completeness in carrying out your duties and ensuring the building remains compliant with the law in the key areas that impact our business.
- b. This process allows us all to be more effective at taking care of customers and following Company's health and safety procedures as well as fulfilling our commitments towards the Gambling Commission. By helping to ensure that you provide superior customer service we can achieve excellence in the eyes of the customer.
- c. Using this checklist ensures that you do not forget anything.

The Daily standards checks sheet can be found in the Appendix.

This should be printed off and completed manually signed before all data is transposed onto the electronic version.

Daily Standards

Fire Doors

You will be trained on fire safety and the safety features that are available at your shop and you will be required to undertake daily and periodic checks of your fire safety features.

These include;

1. Fire exit routes must not be blocked and must also be free of debris every hour of operation.
2. Fire exit doors must be unchained and unlocked during operation.
3. Fire extinguishers and fire alarms must be working and available at all times of the operation.

Cleaning

We aim to keep all areas of the venue, the machines and the equipment in use by customers clean and sanitized at all times. After a customer has finished playing with any of our equipment it must be cleaned and sanitized using the cleaning materials advised by the manager. Cleaning duties will include shop floor hoovering, toilet cleaning and any reasonable request that the shop manager requests you to undertake during your shift.

Refrigerators

The refrigerator is one of the most important areas to focus on when you're cleaning your kitchen. It is absolutely vital that the appliance is kept clean and hygienic.

Daily Tasks

1. Spray every part of the fridge with a multi-purpose cleaner. Wipe down the walls, seams, and door seals for best results. Wipe away the remaining solution with a non-abrasive sponge for a spotless fridge.
2. Check the Fridge for; Spills on shelves, Spills inside door shelves, inside of drawers Inside storage bin, Walls of fridge, under the lip where bottom of fridge meets floor
3. Exterior; Clean and disinfect a fridge door handle and exterior using disinfectant or antibacterial wipes and allow to air dry. If you turned off the fridge to save power, now's the time to turn it on again.
4. Remove and dispose safely of any of the following; Expired food, open packages, food with no expiry date, old water bottles.

Coffee Machine

The Operating manual for the coffee machine will be kept in a folder near to the coffee machine. Should you experience any faults, or indicator lights on the machine that you need to clarify, please refer to the operations manual for the machine. If you are unable to resolve the machine's fault then please contact the manager to rectify the problem at the earliest convenience. The machine has a daily routine that operators need to follow as part of the daily checks.

1. Use the key to open the service door and then the service panel will be visible with 5 basic routines;
2. The quality of the drinks offered will only be at the right standard if the routines are followed daily.
3. The machine is very sensitive to dirt and must be kept clean at all times.

Daily Routines

1. Check the contents of the ingredients are containers and refill as necessary
2. Rinse the mixers at least twice per day into a rinsing jug
3. Clean the outside of the machine paying attention to the following;
 - Clean with a damp cloth or paper towel
 - Always put the clean parts back on to the machines
 - Rinse the machine more often than twice daily if the machine is in constant use.

Weekly Routines

1. Clean the mixer parts which must include; Extractors, Mixing compartments, hose, extraction filter cover, mixer blade.
2. You must use the machines manual using section 4 page 21 and follow the detailed instruction for each part of the machine.

Refer to "So Pure Beverage Technology User Manual Appendix 1 of this manual.

Toilets

A clean, well- maintained toilet promotes health and hygiene and reduces the spread of infection and disease. They should be checked, as a minimum, twice every hour for the following and signing the check sheet in the toilet to confirm the:

1. Unpleasant smells
2. Sufficient supply of toilet paper, hand gels & responsible gambling materials
3. General cleanliness of floors and sink areas
4. Any maintenance related issues should be reported to the manager / area manager immediately.

Air Conditioning

Maintaining the temperature of our venues is important to staff and customers comfort. Everyone reacts differently to varying levels of heat, there will never be a perfect venue temperature. There is, however, a generally agreed consensus based upon a wide range of studies which points to an optimal temperature which is underlying between 20 °C and 24 °C. As standard all air con systems should be set to 22°C. Refer to the AC manual on how to set the A/C to auto mode or please ask your managers who will be happy to help you. In instances or extreme weather this can be adjusted up or down with your area manager's approval.

GTab Equipment Routines

The GTab kiosk is where customers can credit and cash out their tablets. The kiosk includes a coin mech and note acceptor to credit the tablet and Tito printer to cash out any winnings from the GTab tablets.

GTab Charging Rack

It is essential that the tablets, when not in use are in the charging rack and the green light indicates that they will be fully charges for use by customers. The way that the units work is that they will stay lit for 2 hours then they will automatically switch to battery power to retain battery life. As part of the daily routines, you must ensure all tablets not in use are in the rack and that any faults are reported to management quickly for rectification. If GTAB units are not working properly it can affect the operating license of the premises so it is essential that these are checked hourly and problems rectified quickly.

See separate operating manual for GTAB units.

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Vantage Kiosk

This kiosk will be used by members of Little Vegas on entry. The kiosk will provide club member benefits such as cash match, promotional credits for machines and a number of seasonal offers. The kiosk and printer must be in use at all times as this system tracks customer use and ensures that daily promotions are managed properly. Please see separate operating procedures and ensure that the system is live and working at all times on your daily routines.

IHL Smart Tablet

This tablet is the recording system used for your compliance, so it is essential that it is fully charged and available at all times. You must check the tablet at the start of each shift and sign the check sheet to confirm this. As part of your daily routines, you must use this tablet frequently and it is a legal requirement for it to be available and in use. Please check it regularly in quiet times, use it and report it if it is not working.

Customer & Staff Refreshments

We offer our customers refreshments during their visit to our venue.

These include; Hot and Cold drinks and pre-wrapped snacks i.e., biscuits and chocolate bars.

There are no limits on what we offer each customer during their visit, however;

- Each site has a weekly budget for these refreshments so it must be managed in line with these amounts.
- Snacks should not be left unattended but kept on a tray in the office and offered out to customers every 20 – 30 minutes.
- This gives you the opportunity to talk and interact with our customers.
- Refreshments are ordered via our local provider Euro office and locally and are approved by the Manager before being placed. Each local provider has a menu with all allergen information contained within the menu so customers are informed.
- The order should be placed using the shop phone.
- These items are then delivered direct to venue.
- Items such as Milk are to be purchased locally via petty cash.
- All items must then be stored securely in the venue off of the floor.
- Items need to be rotated so that we use the near dated stock first.
- The coffee Machine must be cleaned Daily and in line with the manufacturer recommendation as described in the earlier section on coffee machines.
- Staff may have unlimited hot drinks through their shift. No drinking on the shop floor.

- Drinks and Snacks are for customers to consume in the venue during their visit, not for customers who are leaving the venue.
- Staff are not permitted to remove any drinks or snacks from the venue and take them home.

Uniform

Chongie Entertainment Ltd will provide staff with a company uniform. The uniform provided by Chongie Entertainment, will be issued by the company and subject to the following conditions;

- ✓ All uniform must be kept clean and in good condition at all times
- ✓ Issued uniform that needs to be replaced due to fair wear and tear will be replaced at the company's expense and issued periodically.
- ✓ Uniform that needs to be replaced due to misuse or negligence will be chargeable.
- ✓ Employees must return any uniform provided to them on leaving the company. The company reserves the right to deduct the cost of such items from any final payments due to an employee where the employee fails to return the items, or they are returned in an unacceptable condition.
- ✓ Black footwear to be worn.

Personal Appearance

We want you to feel comfortable and smartly presented at our venues at all time Mobile Phones must be stored in your lockers and will not be permitted on to the shop floor. You can check them during breaks and at intervals with the managers permission in the event of you needing to stay in contact for personal reasons.

Lockers

Are provided in the staff areas for your use and the company reserves the right to search your lockers (with you present) at any time.

Playing of Machines

Whilst we encourage you to know as much as you can about the games and the gaming machines content, we do not allow the playing of the machines in a "live shop environment" so put quite simply there is no playing of the machines at any time. We do have competition settings and demonstration settings on the machines and the shop manager will run briefings and staff competitions which will allow you free play and to learn about the games and features.

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6) Payroll & Rota's - Best Practice

To provide user friendly Rota management and accurate payroll data across our venues, Chongie Entertainment Limited uses the management platform Bright HR.

The Schedule:

1. Venue Manager has to build a weekly Rota ensuring at least two weeks approved Rota's on the system by every Friday 6pm.
2. Venue Managers to print off and display two weeks Rota in the office at all times.
3. On a daily basis venue managers must confirm time worked on the worklog and record/amend as needed
4. Venue Managers and Supervisors to work alternative shifts where possible.
5. To ensure accuracy, venue managers must confirm worklogs daily. Managers will ensure that all worklogs have been confirmed weekly pre 10am every day for paying staff]
6. Recording Absences – The recognized absences are set out below and must be accompanied with the correct paperwork for payment.
 - Lateness or overtime
 - Sickness with note
 - Sickness without note
 - Authorised absence
 - Unauthorised absence
 - Relief staff
 - Annual Leave
7. In the instance of all unauthorized absence or sickness a return-to-work interview will take place on your return and the return to work form will be filled in and kept on your personal records. All starter and leaver information and paperwork are to be emailed HR@chongieentertainment.com within the same week/pay period by venue manager.

The Weekly Rota sheet can be found in the Bright HR folder in the google drive.
Payroll.

To ensure that People get paid, accurately and on time the process should be managed daily to ensure that the data being inputted is both accurate and still in clear and vivid memory. Any disputes should be verified using the CCTV system to confirm start and end dates for weekly paid employees.

Accurate information is needed to:

- Calculate how much your employees need to be paid
- Calculate how much tax and NIC you need to deduct from an employee's gross pay

- Report employee pay details to HMRC
- And most importantly, pay your employees

If you are paid weekly, you will be paid according to your contract of employment. Should you leave the company then the pay will be as normal until the leaving date and any unpaid holidays or overtime will be settled on your final days pay. Please refer to the standard conditions of employment to verify policies around payment in lieu and unpaid holidays.

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7) Slot Machine Standards

At Chongie Entertainment Limited we aim to provide a safe, enjoyable and compliant Operation.

Below is a basic guide to help the team achieve this standard;

Basic Operational Machine Standards

Cleanliness

1. Machines must be cleaned following daily and periodical checklists.
2. Machine fronts, playfields, cabinets, footplates, and seating should be cleaned regularly.
3. Stools
4. Machine Dividers

Game Volume

1. Machine volume levels must be audible without overpowering neighboring machines.
2. Overall ambient noise levels should be comfortable within shops.

Playability

1. All machines should have excellent coin and note acceptance levels with regular checks and cleaning taking place.
2. All machine bulbs and lighting should be in good working order and checked regularly.
3. Machine locations should ensure comfortable access and playing positions for customers.

Legal Compliance Labelling

In order to meet company operational standards and to comply with the Gambling Act 2005, all gaming machines must have the following approved labels correctly placed and display.

Machine Identifier/Number Label

Every Gaming machine has a unique machine number and should be displayed on the top lefthand side of every machine/screen. The asset number will be displayed in the bottom left had side of the cabinet. Replacement labels can be sourced from Senior Managers.

Machine Categories

Compliance with the Gambling Act 2005 requires our slot machines to be Categorized under the Gambling Act as set out below.

These are the only categories of Gaming machine we can operate in the AGC.

CATEGORY	Maximum Stake	Maximum Prize
B3	£2	£500
C	£1	£100
D	10p	£5

Some Slot machines have factory fitted labels. All of our machines will be fitted with a category sticker which will be fitted on the right of the machine near the cash tray. This assists Local Authorities and Gambling Commission Officers to identify the machine quickly. These should be checked weekly to ensure they are still in place. Legacy denotes a machine manufactured before 2007 under the Act and will have this displayed on the category sticker as set out below with just the word “Legacy” added to the category sticker;

Price of Play & Percentage Pay Out

The price of play and game percentage pay-out will be displayed easily on digital machines and can be found in the game menu. On older reel-based machines it has to be accurately displayed and should be checked regularly with the manufacturers especially after content updates.

No Under 18 signage



This sign must be displayed on every machine – Often they are pre-built into the machine display, but where they are not a supply of these stickers are available from Head Office.

Responsible Gambling

It is a requirement to make customers over the age of 18 aware of help they can get if their gambling becomes problematic to them. In toilets and on machines Gamcare



stickers should be available and displayed. On the screen or near the note / coin acceptors.

Machine Faults, Service & Breakdown

The company has a system called MARS which is a machine management system and will also monitor machines performance and breakdown records.

If for any reason a machine is not working properly then the machine fault log must be filled in and then entered onto the MARS system to track the down time.

It is extremely important that GTAB's and B3 machines are repaired urgently so please also ensure that these are given the highest of priority.

The Machine Fault Log is in the Appendix.

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8) Security Procedures

Lone Working and Risk of Robbery Theft – Policy and Risk Assessment Approach

In certain circumstances, it is possible that one person operates some of our sites. There is no prohibition on workers operating alone in our business, however, as employers we are responsible for the Health and Safety of our employees and of those affected by their work. The following policy will be applied to determine the suitability of Single Manning operations in each site. The criteria are not exhaustive as unique circumstances may apply to individual shops. If uncertain, advice must be sought from the Manager. Some of our sites have also agreed to not single-man the operations as a condition to attain the Premise Licence.

Policy Criteria

Sites must not plan to operate with one member of staff where:

- Where a robbery or violent incident has occurred during the preceding 3 months or where a previous robbery history indicates a likelihood of recurrence.
- Where incidents of disorder have been a feature due to alcohol or drugs misuse during the preceding 2 months.
- Where the Fire Procedures/Emergency Evacuation cannot be operated by one person.
- Where the site is not fitted with an alarm system for use in case of illness, accident, personal attack or another emergency. A personal alarm should also be in use.
- The function of the personal alarm is crucial and should be tested fortnightly.
- 6. Where a site has 2 entrances front and rear The Manager will advise as to whether the rear entrance may be locked during single manning operations.

Personnel Criteria

Medical Suitability

Employees working alone must be free from any medical condition that would render them unable to operate in emergency situations on their own. If in doubt, consult the Manager.

Training Competence

Employees working alone must have knowledge of this procedure and the sites emergency procedures appropriate to their employment status.

In particular, they must clearly understand:

- Their role in respect of contacting the emergency services in the event of accident, fire, crime and illness.
- The safe operation of equipment, in particular fire extinguishers.
- Their own responsibilities under The Health and Safety at Work Act 1974.
- The call signs for the safe operation of the staff guard system.

Twin Shop Procedures

In the event an opening or lock up is to be performed under lone worker conditions then every site that single mans must have a nominated twin site for opening and closing link up and supervision arrangements. In the event that the site is not available then the senior manager must be called.

Closing

When ready to close, contact the twin site as above (senior manager). Follow same procedure maintaining telephone contact. When the site is clear of customers, and all doors are secured, advise the twin site (area manager)

Site Specific Procedures

- ✓ Some sites operate a single manning in the mornings from 9am to 2pm normally the site is paired with another for Security and Safety purposes.
- ✓ When operating a shift staff must carry their staff guard at all times.
- ✓ All cash transactions should where possible be carried out under the CCTV fitted within the site or behind the glass in the locked cashier's desk whenever the safe needs to be accessed. If the member of staff feels threatened then they can activate the staff guard monitoring service whilst they complete the transaction safely.
- ✓ All staff are to have been trained and have used the staff guard system and know and understand the codes to activate; an emergency situation a monitoring situation or a test of the service. See separate staff guard appendix for details.
- ✓ The rear entrance to the site should not permit access from the street during evenings where the site is single manned.
- ✓ 6. All staff must read and understand the fire and evacuation procedures for the site. They are required to know the location of all emergency telephone numbers.
- ✓ 7. The shop manager is required to test staff guard alarms weekly. The Operations Manager is required to oversee that staff guard alarms are tested.
- ✓ Any Security equipment faults safes, alarms, locks, shutters, CCTV etc. must be reported to the Shop and Senior Manager immediately. If staff have any concerns regarding this policy and procedure, please contact your manager.

Locked Door Policy Approach

In certain circumstances it may be required to operate with a locked door in certain of our locations.

Policy Criteria

Sites will operate a locked door policy where there has been a series of incidents or activities in the local community that affect the security and safety of our staff and customers. Incident logs will be reviewed and the senior manager will determine the policy with the local staff and management from time to time.

Criteria

During the times when sites operate with a locked door;

- ❖ The main entrance into the venue must remain locked by the maglock security system.
- ❖ A team member will remain adjacent to, or close by the front door at all times the Locked Door policy is in force. This will allow team members on duty to accurately control any customer entry into the venue whilst also allowing emergency exit.
- ❖ Customers must only be admitted into the venue once visually assessed to confirm the following.
 - ? Are they known to the staff on duty?
 - ? Do they seem to be vulnerable (under the influence of drink or drugs)?
 - ? Customers must be engaged with if allowed entry to fully assess if they are vulnerable.
 - ? Are they over 18 (Challenge 25) If ID cannot be provided entry must be denied. Are they are excluded or self-excluded?
 - ? The site is not over the maximum number of customers allowed in store at any one time (for either Covid-19 or single manning reasons)

Machine Fraudsters

The machines most at risk of fraudsters are those with cash in them, however there are some quite sophisticated scams that machine fraudsters will try to take advantage of.

There are certain policies to enforce whilst players are playing at the machines;

- * One Player to each machine at any time do not allow players to spoil the line of view to machine play or obscure the CCTV.
- * Players must not wear hats at the machine their faces must be clearly visible to the CCTV.
- * Do not allow yourself to be distracted from the new player who is at the machine by a second person distracting you from seeing the player.

- * Make sure the customer does not have his mobile phone placed on the machine unless it is being used to transfer credit via the APP wallet. Available on certain cabinets.
- * Never allow a customer to re-boot the machine and if a machine is re-booted escalate the incident to a senior manager immediately as it is likely a device has been fitted to the machine which will trigger on the re-booting of the machine.
- * Be aware of suspicious behaviour, such as players constantly looking to see if they are being spotted by a member of staff.
- * Remain familiar with the pictures of the main machine fraudsters which will be displayed on the staff notice board in the offices. BACTA (our trade body) circulate known machine criminals from time to time. DO NOT APPROACH them escalate to a manager immediately.

Training

The Locked Door policy will be used and implemented when deemed necessary by the Senior Manager. However, should a team members feel that additional security measures are needed, they should adopt the Locked Door policy and inform senior management via the emergency contact process.

The Locked Door policy may be used at any time and is not deemed solely for single manning situations.

Conflict Resolution

Dealing with Aggressive Customers - What causes aggression and violence?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object.

Below are some of the reasons in different situations;

- ✓ Platonic
- ✓ Instinctive Learned Behaviour
- ✓ Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
- ✓ The best defence is attack!
- ✓ Aggression is sometimes part of the behaviour we have learned from society.
- ✓ Energy Source Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way, society accepts and rewards.
- ✓ Frustration Response When frustration in an individual reach's certain levels the only option open may be a display of aggression. What are some of the causes of violence?

There are two aspects to consider:

- ✓ Physical Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather),
- ✓ Appearance, Illness, Defence of Territory of Possessions, Age Psychological Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of elf), Age, Illness (affective disorders, schizophrenia), Oppression.

There are tell-tale signs so the key thing is to observe customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour. These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Balanced to move?
- Fingers or eyelids twitching?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tears?
- Offensive weapon carried or available?

Procedure

Quite simply whenever there is an incident you should;

H = Hear the customer – listen to their complaint or issues.

E = Empathise – see to understand the problem.

A = Acknowledge – ‘I hear what you are saying’, ‘I’m sorry you feel that way’.

T = Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently:

Body Language

- a) 80% - 90% of our communication is non-verbal. It is very important to be able to identify exactly what we are communicating to others non-verbally.
- b) You may be trying to de-escalate the situation by talking to the other person, but your body language may be showing a willingness to get physical. It is also important that we recognize and understand the non-verbal cues from another person who has the potential of escalating.

- c) When people are angry, they sometimes do not “listen” to the words that are being said. Remember the difference between “hearing” and “listening”. Often, they do “see” and react to what you are “saying” with your body language. You must always be very careful with the message you are sending.
- d) Never point your finger this may seem accusing or threatening. You should also avoid shoulder shrugging this may seem uncaring or unknowing. A natural smile is good, a fake smile can aggravate the situation. Use slow and deliberate movements – quick actions may surprise or scare the other person.

Personal Space

Invasion or encroachment of personal space tends to heighten or escalate anxiety.

Note: Personal space is usually 1 ½ to 3 feet (Far enough away so you cannot be hit or kicked)

- Do not touch a hostile person – they might interpret that as an aggressive action.
- Keep your hands visible at all times – you do not want the other person to misinterpret your physical actions.

Challenging postures that tend to threaten another person and escalate any situation include:

- Face to face
- Nose to nose
- Toe to toe
- Eyeball to eyeball
- Touching
- Be alert and consider if you need further assistance.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move - stay on person's weak side where possible.
- Speak clearly and slowly and don't stop talking because the other person doesn't answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Do not argue! You really cannot win because the other person does not have to be logical. If you lose the argument and have to back off, your position is weakened. You may get so involved, if you do not carefully

measure your own response, that you might, in the end, lose some of your own self-control.

- Do not give orders.
- Never make promises you cannot keep.
- Do not disagree where it is not necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.
- Control your behaviour in body language, feelings and expression.

Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.

In conversation with the person being confronted use expressions such as: "I know you have a problem", "I know you are upset", "I believe you when you say something is wrong". Keep your voice at a calm, even pace. Say something is wrong". Keep your voice at a calm, even pace. These expressions will show that you have some affinity with the person and his/her position say something is wrong". Keep your voice at a calm, even pace. These expressions will show that you have some affinity with the person and his/her position. Always consider if you need further assistance from a colleague, if the person becomes abusive in their language or behaviour they should be asked to leave immediately, (remember to refund their stake money). If they refuse to leave then assistance from management or the police should be sought.

Preventing Staff from being abused

Under no circumstances should a member of staff put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked a manager should be called. If the customer is still aggressive and still refuses to leave the premises then the police should be called. At no time should a member of staff intervene physically in the removal of an individual from a site.

All incidents should be fully recorded on the IHL Smart Tablet incident log.

Whistleblowing

About this policy Chongie Entertainments Ltd are committed to conducting business with honesty / integrity and expect all staff to maintain high standards. We encourage staff to report suspected wrongdoing as soon as possible. This policy does not form part of any employee's contract of employment and we may amend it at any time.

Who is covered by this policy?

This policy applies to all employees working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors,

trainees, homeworkers, parttime and fixed-term workers, casual and agency staff and volunteers (collectively referred to as staff in this policy).

What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. It also includes negligence, conduct likely to damage our reputation, unauthorised disclosure of confidential information and the deliberate concealment of any of the above.

How to raise a concern

- We hope that in many cases you will be able to raise any concerns with your line manager. However, where you prefer not to raise it with your line manager, for any reason, you should contact the Whistleblowing Officer:

HR@chongieentertainment.com

Contact details are at the end of this policy.

- This policy should not be used for complaints relating to your own personal circumstances such as the way you have been treated at work and you are referred to the Company grievance procedure if you have such concerns. In those cases, you should use the company Grievance Procedure as appropriate.
- We will arrange a meeting or phone call with you (as appropriate) as soon as possible to discuss your concern.

Confidentiality

We hope that staff will feel able to voice their concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

Protection and support for whistleblowers

We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Staff must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform HR@congieentertainment.com immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

Staff must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

Contacts

Confidential details of the company officers responsible for whistleblowing:

Name: Dan Pearson
Telephone Number: 07957 231930
Email Address: Dan@chongie-entertainment.com

Emergency Support

- i. Should you require any support or advice you will find the company and emergency contact list of numbers for all eventualities in the office on the poster board.
- ii. All staff should familiarise themselves with these documents.
- iii. For the emergency services you must call 999 immediately. You must also call the police on 999 to report any incident of violence to either staff or other customers.
- iv. Should you require non-emergency support or to make management aware of any issues in venue you will find the numbers for the Venue Manager in the office. If you cannot reach your Venue Manager then there are also contact numbers for your Area Manager, Regional Manager and Operations Director.
- v. This poster also lists your 4 nearest sites and identifies which site is twinned with your site in order to check in hourly when Lone Working.
- vi. The information poster gives contact numbers for all local services that you may require including Gas, Water, Electric etc.
- vii. It is important that every site has a working landline or mobile phone. Any phone line faults must report to your Area Manager immediately.

Extended Hours Security Measures and Operational Management

All premises operate a direct neighbour policy to ensure neighbouring businesses and residents are respected. Robust security and management measures are in place to ensure the premises, customers and neighbours are well managed.

The following measures will be in place during extended hours operation:

- A duty manager will be onsite at all times.
- All venues have external notices stating drinking alcohol directly outside the premises is forbidden and those who do so will be banned from the premises.
- Individuals deemed to be under the influence of excessive alcohol will not be granted access to the premises.
- Main front doors will not be propped open while trading at any time.

- Background music only will be played, with no speakers near the main front doors.
- Customer notices are displayed at the doors reminding customers to leave quietly and respect our neighbours. Staff will also politely remind customers to leave quietly. Customers found to be loitering near the premises will be politely asked to move on.
- SIA licenced security guards will be employed through a licenced and reputable agency.
- All premises have a comprehensive CCTV system which continuously records and stores recordings for 31 consecutive days. Management will be competent in the operation of the CCTV system.
- A digital incident log is to be kept at the premises at all times and available to be viewed by an authorised officer of the Licensing Authority or the Police.
- All premises' front and rear doors are fitted with Maglock systems.
- All premises have panic alarms installed which are located discreetly throughout the premises.

The safety of customers and staff is of paramount importance to the company. Should a team member have any concerns regarding the Emergency Support Procedures they should discuss them immediately with the Area Manager.

Operations Manual

9) I.T. Policy

Computer and Electronic Devices – MOBILE PHONE POLICY

Hardware and Software computers provided by Chongie Entertainments are an expensive piece of equipment and in order to safeguard that it is used correctly, this policy must be adhered to.

Your attention is specifically, drawn to the fact that computer misuse can have broad ramifications and can attract various liabilities including criminal

Can you please take the appropriate steps to guard against unauthorised access to, alteration, accidental loss, disclosure or destruction of data? Under no circumstances should you divulge your password to anyone else nor should you gain access or attempt to gain access to information stored electronically which is beyond the scope of your authorised access level.

- ✓ You are responsible for any activity which occurs within your accounts.
- ✓ Personal use of computer and telephone systems is not permitted.
- ✓ Storage of personal files/images/software/Apps should be kept to a minimum and must not impact on the performance of the network or device.
- ✓ Storage of personal files/images/software/ Apps on the Company network or devices is not permitted.
- ✓ You must not use the Company Internet connections or devices to access content that is illegal, pornographic, or supports hate and/or discrimination.
- ✓ You must not send communications via any Company or personal device that could be deemed to be offensive.

Use Of Company I.T. Equipment

- ✓ Computers are only to be used for legitimate business purposes.
- ✓ This means that you must use your equipment for the normal day-to-day activities for which you are employed.
- ✓ If in doubt, you must seek guidance from a senior member of staff.
- ✓ The Company reserves the right to access and monitor use of all Company owned digital devices, including monitoring internet, telephone and e-mail use.
- ✓ The Company also monitors access to its network via private devices.
- ✓ Because of potential virus infection and consequent damage to the business, you must not download or load any software into any computer including memory sticks, flash drives, pen drives or any portable memory devices without the prior approval of management.
- ✓ Approval will only be given after virus checking.
- ✓ You must not make 'pirate' copies of any software for use by other persons inside or outside the Company. This not only breaks Company rules, it is an

illegal practice and prosecution will be sought to protect the company's business interests.

- ✓ The company reserves the right to use tracking facilities and equipment on their equipment. racking facilities.
- ✓ Company may use these as follows:
 - For the prevention and detection of theft
 - To protect the health and safety of employees.
 - As a method of checking the accuracy of Company records, such as timesheets
- ✓ You must not tamper with any tracking facility or device. Tampering with tracking may lead to action under the disciplinary procedure up to and including summary dismissal.
- ✓ All passwords must remain secure, and you must never leave accounts open whilst you are away from your device

Employee Social Media Policy

1. We all Use social media every day and that remains our personal choice. LinkedIn, Twitter, Facebook, Instagram etc.
2. There are certain things that it is not acceptable for you to talk about whilst an employee of the company. Your contractual obligations are set out in the standard terms and conditions of employment and you should make yourself familiar with them.
3. Discussions about any aspects of the company's business that is considered confidential information about the company's financial performance, promotional activity, employees or personal data, Will be treated very seriously as a breach of confidentiality which may lead to termination of employment.
4. We all respect each other's rights as human beings but anything that is discrimination, abusive, threatening related to you, or any other employee, customer or supplier is not acceptable.
5. Do not hide behind false accounts, brands or names (No astroturfing).
6. Never bait, bully or be abusive with any accounts that are linked back to the company or privately with your colleagues.
7. Never create social media accounts in the name of the company, you do not have the company's permission to do so, unless given in writing by the CEO.
8. Have fun using social media accounts but if you have any concerns or queries then please refer to your line manager or the whistleblowing policy to progress.

Operations Manual

10) Compliance

Licensing Objectives

The Company is committed to upholding the UKGC Licensing Objectives, which are:

To Ensure that Gambling is Offered in a Fair and Open Way

We aim to do this by only purchasing or renting machines from manufacturers that hold a UK Operating Licence, to ensure that all our machines are compliant with the UKGC Technical Display standards and have been tested to the appropriate standards.

Any promotions that take place in our venues will be checked for compliance before being implemented and displaying the Terms and Conditions for these promotions for our customers.

When we receive a gaming related complaint, we will endeavour to resolve this in-house, however where this is not achieved, the customer will be asked to call the dedicated complaints line: 0333 006 7110 or info@chongie-entertainment.com

If the Senior management team are still unable to resolve the complaint, the customer will be directed to our Trade Associations Alternative Dispute Resolution Provider: www.bactaadrservice.org.uk

This ADR facility will be provided free of charge to the customer and as an operator we will follow their decision and guidance.

To Prevent Gambling from being a Source of Crime and Disorder

Whilst Gambling sectors are exempt from the 4th EU Money Laundering Directive, as a Company we accept that we have a Duty of Care to ensure that our venues are not being used to facilitate any type of money laundering or spending the Proceeds of Crime. All of our staff are trained on how to spot suspicious behaviour or transaction and that they must report this to our Designated Money Laundering Officer.

As a cash rich industry, we are aware of the risks involved in cash handling and security – we have robust policies in place, in order to minimise these risks. A generic company money laundering risk assessment is in place and any specific venue based risks are addressed accordingly.

To Protect the Young and the Vulnerable

As a Company we operate the Think 25 scheme – to which all of our staff are trained. If they think that someone is under 25, they will prevent them from entering the premise, until they are able to provide valid photo identification – passport, driving licence or PASS logo ID. We do not employ anyone under the age of 18, should a contractor be required to enter our venue with staff that are under 18, this will be done outside of our opening hours, or they will also be refused entry. Every challenge is recorded on the IHL tablet.

(Insert instructions – attached).

Our staff are trained to identify people that could be vulnerable, whether that be from a physical point – age, learning difficulties, mental illness; or from an addiction point – alcohol, drugs, gambling. The company approach is to 'Know Your Customer' staff will identify their behaviours based on the level of play, frequency of visits and interaction, if any of these things change, the staff are trained to interact with the customer. All interactions will be recorded on the IHL tablet and reviewed by the senior management team.

(Insert customer interaction instructions – attached)

The Interaction is designed to check that the customer is ok – that they are in control of their gambling and that they understand there is help available to them, if needed. If, however, the interaction does not achieve the required outcome, i.e. that the customer realises that they are spending too much time or money on their gambling and changes their behaviour. Then the customer has the option to remove themselves from gambling in the short term in order that they can seek help.

As a company we participate in a Self Exclusion scheme which allows a customer to exclude themselves from all Adult Gaming Centres within a kilometre radius of their base venue. This is facilitated by the customer completing an agreement on our IHL tablet and their photograph is then circulated to all relevant operators in the vicinity. The period of self exclusion can be a minimum of 6 months and a maximum of 12, and the agreement states that they will not attempt to gain entry to an AGC and we agree that if they do and are recognised we will refuse them entry and/or ask them to leave. The tablet is GDPR compliant and can only be accessed by operators using secure log in protocols.

(Insert Self exclusion instructions – attached)

Access to our Venues by Co-Regulators

There are five Co-regulators that should be allowed unrestricted access to our Venues for Regulatory or Enforcement reasons. These are:

- Police
- Fire
- Local Authority – Licensing, Environmental Health
- HMRC – for tax purposes
- Gambling Commission

All our staff are trained that these bodies should be allowed access, however, without relevant ID they will not be entitled to look at any areas of the business not open to the public.

On receiving a visit, staff should immediately telephone a member of the senior management team and ask for ID.

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11) Health & Safety Policies

1. Basic company Policy Statement and approach to H&S signed by CEO

2. Accidents & Incidents

Any accidents and incidents must be recorded on the IHL tablet. Where it is an accident, the customer should be offered First Aid and a full, detailed report should be written, with photos and CCTV where possible. These should then be sent to Head Office for secure storage.

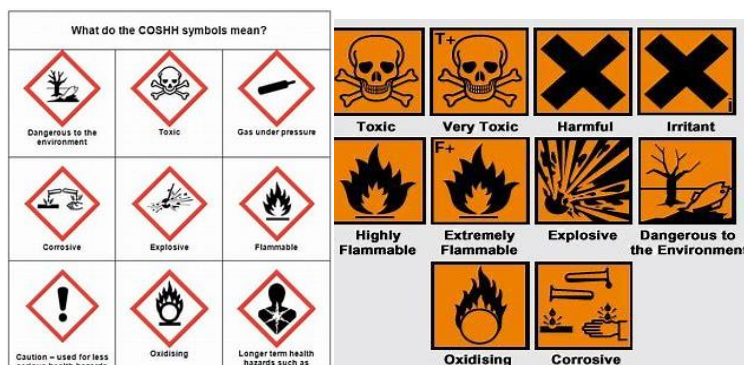
The cause of any accident will be investigated and where necessary action taken to prevent further such accidents.

3. Contractors on Site

Where contractors are on site, during opening hours, they must be accompanied at all times where possible. They must sign in and be made aware of the Fire evacuation procedure.

4. COSHH (control of substances hazardous to health)

COSHH assessments must be provided for all of the hazardous substances on site. These will be provided by the suppliers and stored securely in the venue office.



5. Electrical Installations and PAT testing

All electrical installations shall be carried out by a Registered company

7. Fire Safety

8. Food & Food Allergens

9. Gas Safety

10. Manual Handling

11. Microwaves

12. Expectant Mothers

13. New Equipment

14. Noise at Work
15. Slips trips & Falls
16. Stress
17. Working at Height
18. Workplace Transport.