

Responsible Gaming Policies and Procedures

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1.0 Overview

1. The purpose of this document is to provide detailed Responsible Gaming policies and procedures in an effort to ensure compliance with current regulations and to protect both patrons and employees from the effects of problem gambling.

2.0 Problem Gambling and Resources

- The Suquamish Clearwater Casino Resort is committed to providing a fun and safe environment for both patrons and employees. An essential component of this commitment is to ensure that our patrons can responsibly enjoy casino games as a form of entertainment.
- 2. According to the National Council on Problem Gambling:
 - a. Problem gambling includes all gambling behavior patterns that compromise, disrupt or damage personal, family or vocational pursuits.
 - b. The symptoms include increasing preoccupation with gambling, a need to bet more money more frequently, restlessness or irritability when attempting to stop, "chasing" losses and loss of control manifested by continuation of the gambling behavior in spite of mounting, serious, negative consequences.
- 3. When gambling becomes a problem and is no longer a form of casual entertainment, help is available.
 - a. Washington State Problem Gambling Helpline
 - i. (800) 547-6133
 - ii. evergreencpg.org
 - b. National Council on Problem Gambling
 - i. (800) 552-4700
 - ii. rcpgambling.org/help-treatment
 - c. Suquamish Wellness Center
 - i. (360) 394-8558

- ii. https://suquamish.nsn.us/home/departments/wellness-center/
- Problem gambling services including assessments, individual sessions, family sessions, and group sessions are provided to all community members.
- 4. While employees are not counselors, they can provide liaison support to guide patrons to the help they need. In the event an employee encounters a patron with a suspected gambling problem:
 - a. Listen to patrons in a respectful and non-judgmental manner
 - b. Notify management and/or Security personnel
 - c. Provide problem gambling information if requested

3.0 Self-Exclusion

 A Permanent Self-Exclusion from the Suquamish Clearwater Casino Resort can be requested through the Suquamish Tribal Gaming Commission (STGC) when a player feels that their gambling has become a problem, pursuant to Suquamish Tribal Code 11.5.86. Gaming Employees who receive or become aware of a player's request for permanent self-exclusion will direct the player to a Suquamish Tribal Gaming Commission officer.

4.0 Employee Training

- 1. Gaming employees will be trained on problem gambling issues at least once per calendar year.
 - a. New hires and transfers will undergo problem gambling training within the first month of being in their new position.
 - b. This training will include guidance on how to identify problem gamblers, how to provide assistance when asked, underage gambling prevention, and unattended children.
 - c. Management and Security will be provided separate training specific to their positions.
 - d. Employees will be required to pass an assessment at the conclusion of the training.

5.0 Minors

- 1. All minors on the gaming floor must continuously walk until they reach a non-gaming destination in accordance with the *Minors on the Gaming Floor Memo*.
- 2. In the event an unattended minor is located on the gaming floor or in a parked vehicle on property, Security will contact the minor and ask for the name of their adult guardian.
 - a. Security will page the guardian and reunite them with the minor.
 - b. The adult guardian will be reminded of the casino's policy on minors on the gaming floor and if it is found that they do not comply, the guardian and minor will be asked to leave property.

6.0 Underage Gambling

- 1. No person under the age of eighteen years shall be permitted to play any Class II or Class III game.
- In the event an individual under the age of 18 is observed playing a Class II or Class III game in the casino, Security will notify a Suquamish Tribal Gaming Agent and Surveillance.
 - a. Security will confirm the age of the individual by checking their identification.
 - b. The individual will be escorted to the Security Office where they will be refused service until the age of 18.

7.0 Employee Gambling

- 1. All non-gaming Port Madison Enterprises employees may play all Class II and Class III Games at the Suquamish Clearwater Casino Resort.
- 2. No person who is a director or in an equivalent position in any department of the Suquamish Clearwater Casino, is employed in the Compliance Department of the Suquamish Clearwater Casino or is employed as part of the executive management of the Suquamish Clearwater Casino (which, for these purposes, shall be the Chief Executive Officer, Chief Operations Officer, Chief Financial Officer, General Manager,

Assistant General Manager, and Comptroller), whether on a full-time, part-time, or contract basis, may play any games conducted at the Suquamish Clearwater Casino.

- 3. All other employees of the Suquamish Clearwater Casino, while off the clock and out of uniform, may play any games that are not part of their department.
 - a. By special exception to this Section, poker employees may, while off the clock, participate in a Class II or Class III poker game, and while on the clock, may participate in the Class II or Class III poker game as a "proposition player," using the employee's own money for wagering.
- 4. When an employee feels that their gambling has become a problem, they can request to be refused service under the Employee Permanent Gaming Refusal of Service policy while still retaining employment.
 - a. If approved, the employee would not be allowed to participate in any form of gaming at the Suquamish Clearwater Casino.

8.0 Responsible Gaming Disclosures

- 1. A responsible gaming disclosure that includes resources for problem gambling will be included in all promotional material sent to patrons.
- 2. Available problem gaming resources to patrons will be conspicuously displayed within advertising and marketing signage materials.
 - a. All Sports Wagering Kiosks shall display a commitment to responsible gaming and provide a link to this document.

9.0 Historical Changes

- 1. December 15, 2021 PME Board approved the 09-27-2021 draft.
- 2. September 27, 2021 Document drafted