OS §: 5.2.4 Consumer Protection

**Objective:** To ensure GTECH Indiana efficiently and responsibly addresses public concerns and feedback and implements and supports the Hoosier Lottery’s Responsible Gaming initiatives, prevents the sale and award of prizes to persons under the age of eighteen (18), evenly distributes winning lottery tickets, and provides reasonable accommodations made for people with disabilities.

GTECH Indiana’s objective is to maintain a responsible gaming model, and to promote responsible gaming activities that best serve Hoosier players and communities. GTECH Indiana appreciates the unique obligation it has with respect to protecting players and providing gaming entertainment with the highest standards of social responsibility. Applying responsible gaming and consumer protection best practices, GTECH Indiana operates under a mission statement that emphasizes our core values of integrity and responsibility and therefore has implemented the following policies and procedures to reflect those core values.

**Public Concerns and Feedback:**

GTECH Indiana will maintain a consumer hotline and email address where players and the general public can register feedback or complaints related to the Lottery:

- For questions, comments and complaints from players and the general public, consumers may use either a toll-free hotline number or dedicated email address. The hotline number is posted in all retail locations on ticket stock, instant tickets, and on the Hoosier Lottery website. The email address will be posted on the Hoosier Lottery website. This number and email address are not intended for complaints by employees of GTECH Indiana.
  - Hotline number: 1-800-955-6886
  - Email address: info@hoosierlottery.com

GTECH Indiana takes all consumer comments and complaints seriously and they will be handled in a professional and efficient manner. GTECH Indiana commits to the following:

- Customer feedback will be received by GTECH’s National Response Center (NRC) via the hotline. A ticket (tracking number) will be opened for each call. Customer Feedback tickets will be forwarded to GTECH Indiana’s Director of Corporate Social Responsibility (CSR) and Compliance or functional equivalent, who will respond to the customer directly or direct the ticket to the appropriate individuals within GTECH Indiana, depending on the nature of the feedback.
- The Customer Service email will be received by the Director of CSR and Compliance, or functional equivalent, who will respond to the customer directly or direct the email to the appropriate individuals within GTECH Indiana, depending on the nature of the feedback.
• Complaints will be investigated within a reasonable timeframe and all customer feedback will be addressed.
• Resolutions to each complaint investigation will be recorded in writing by the Director of CSR and Compliance or functional equivalent, a copy of which will be maintained by the GTECH Indiana Legal Department.
• Records of all complaints will be retained for a period of two (2) years.

**Responsible Gaming Initiatives:**

**Problem Gambling Support Services**

GTECH Indiana defines individuals who cannot enjoy playing responsibly as follows: individuals who are under the age of eighteen (18); have behavioral/addiction problems with gaming; or are not engaging in lottery games in a financially responsible manner.

All of our responsible gaming initiatives are designed to provide assistance to those individuals who have difficulty enjoying lottery games responsibly from a behavioral and/or economic perspective. Communication, education, and treatment are the cornerstones of these programs, ensuring we address the social effects of problem gambling.

Support and assistance to players includes:

- A toll-free number that is easily accessible, and readily available.
  - Problem Gaming Hotline is 1-800-994-8448
  - Hotline is posted in the following locations:
    - the back of all ticket stock
    - instant tickets
    - hoosierlottery.com
    - the “Retailer Playbook” newsletter for retailers
- Information on problem gambling, including contact information for support resources is available on the Hoosier Lottery Website.
- Hoosier Lottery partnership with the Division of Mental Health & Addiction (a division of Indiana Family & Social Services Administration) to provide treatment programs through a funding agreement.

**Underage Play Prevention Measures**

Consistent with the Indiana Law, no Lottery tickets will be sold to persons under the age of eighteen (18).

To support the State’s mission against underage play, GTECH Indiana has committed to the following initiatives:

- Include language on Lottery tickets, play slips, and self-service terminals stating that persons under eighteen (18) years of age may not purchase Lottery tickets.
- Post age restriction notice on all self-service machines.
- Educate and train store personnel on state and federal laws prohibiting the purchase of lottery tickets by minors through the monthly Retailer Newsletter and monthly Retailer Playbook.
- Enable remote shutdown of self-service terminals which allows retailer to turn the machine off if underage patrons attempt to purchase tickets. Retailers are
provided with a Radio Frequency Key Fob device or remote-control shutdown from the online terminal screen.

- Place self-service machines in direct line of sight to the retailer wherever possible.
- Post age restrictions at all points of sale and designated lottery play areas.

The Director of Corporate Social Responsibility (CSR) and Compliance and the GTECH Indiana General Counsel will be responsible for ensuring compliance with the abovementioned principles.

**Even Distribution of Winning Tickets:**

Every Lottery instant ticket game is produced according to specifications contained in a document known as the “Working Papers”. The Working Papers for a game specify the graphic design of the ticket (front and back), the variable data that is printed on a ticket including its position and the type and quantity of prizes that are to be included in a game. Other game specifications such as how the tickets are packed in cartons and how cartons are packed on pallets along with other items that do not usually vary from game to game for an individual lottery are included in a companion document that is called the “Client Standards” or “Scratch-off Specifications”.

To ensure the even distribution of winning tickets, instant games are produced in segments known as “pools”. Over time, the concept of pool has evolved to represent the approach used by lotteries to ensure the even distribution of winning tickets throughout a game.

As is the practice in the lottery industry, the specifications as to the types and quantities of prizes for a game are described as the “Prize Structure”. The Prize Structure for a game specifies how many of each type of prize are to be included in each pool. The number of tickets in a pool is defined in the Prize Structure as well. Depending upon the ticket manufacturer, the lottery and the game, a pool may contain 120,000, 240,000 or 250,000 tickets or some other amount of tickets.

By specifying the types and quantities of prizes to be included in each pool, the Lottery and the ticket manufacturer ensure the even distribution of winning tickets throughout their games. Depending upon the value of the top prize and other large prizes in a game, it may not be possible to include one of each of these prizes in each pool of tickets. In these situations, the Lottery and the ticket manufacture agree that these prizes will be allocated over a multiple number of pools, maintaining the concept of an even distribution of prizes across the game.

Another element that is used to ensure the even distribution of prizes throughout each game is the use of Guaranteed Low End Prizes Structures (GLEPS). GLEPS is a process for specifying that each pack of tickets contain a specific assortment of small prizes that has an equivalent value.

There are usually between 3 and 5 specific GLEPS patterns used in programming an instant ticket game, though other amounts can be established for specific games. Each pattern contains a
different combination of small prizes that total to an equivalent (or near equivalent) value of small prizes. The GLEPS patterns are specified as part of the Prize Structure for each game. The Lottery can be assured that the distribution of prizes across tickets, regardless of strip, pack, lot, shipping box, or pool location, for any game is randomly distributed according to the game requirements established by the Working Papers and Client Standards documents.

Accounting Checks of Randomization
All games are subject to checks during programming and production by separate members of the software team and quality control staff to verify that the specifications included in the Working Papers for each game have been met and that the distribution of the winning tickets is random throughout the game. In addition, an internationally recognized accounting firm independently audits the programming of each game. They also confirm that the specifications included in the Working Papers have been met and that the distribution of the prizes is random throughout each game. As is the current practice, all instant ticket suppliers will be required to deliver an audit report prepared by an independent firm skilled in this activity to GTECH Indiana.

Customers with Disabilities:
GTECH Indiana is sensitive to the needs of our disabled players and is committed to making reasonable accommodations when possible. Our goal is to ensure that customers with disabilities are provided the same opportunities as all other individuals. For example:

- Customers who require the use of wheelchairs are able to redeem prize payments at GTECH Indiana sites in Evansville, South Bend, and Indianapolis.
- GTECH Indiana will assist retailers in implementing GTECH technology in a manner that is ADA compliant, such as putting play slips and ticket checkers in accessible locations.

Responsibility for the Consumer Protection Policy
The following GTECH Indiana staff and groups oversee development, implementation, and compliance with this policy:

- The Senior Director and Deputy General Manager along with the Director of CSR and Compliance are responsible for the development, continuous improvement, and management of the Consumer Protection Policy.
- The Director of CSR and Compliance ensures that all policy elements comply with GTECH Indiana obligations under the Operating Standards, as well as with all other responsible gaming and consumer protection requirements established under Indiana law.
- The Director of CSR and Compliance also serves as the primary point of contact for the Commission for all questions pertaining to this policy.
- The CEO of GTECH Indiana has ultimate responsibility for establishing, maintaining, and reviewing GTECH Indiana’s Responsible Gaming and Consumer Protection initiatives with assistance from GTECH Indiana’s Director of CSR and Compliance.
- Annually, prior to the submission of the Annual Business Plan to the Commission, the Director of CSR and Compliance will prepare a report on GTECH Indiana's
implementation of the Responsible Gaming and Consumer Protection program. The Senior Director and Deputy General Manager will review and approve the report as well as the CEO. As part of the Business Plan submission to the Lottery, the Director of CSR and Compliance will submit the report to the Lottery Commission.