

X. A. 3. IDENTIFICATION OF PROBLEM GAMBLING

As presented at length at Exhibit X.A.6., the proposed manager of the new gaming facility (hereinafter referred to as “the Manager”) has developed and maintained for many years a comprehensive Responsible Gaming program. As part of that program, the Manager’s employees whose job titles have been identified as casino-related are trained in the identification of problem gaming and the appropriate measure to follow when a problem gambler is identified. Such employees are required to pass a test to ensure understanding of such training and the program. The Manager proposes to adapt its current responsible gaming program to the new Gaming Facility, but to adapt and expand it to the needs of the host community. This adaptation and expansion will include an employee training program that has been crafted in consultation with the New York Council On Problem Gambling.

Employee Training Policy

1.) Company-Wide Employee Training Policy.

All casino and casino related employees are required to complete training on Responsible Gambling and Problem Gambling. Training will be provided upon initial hiring and refresher training will be required annually. An evaluation process will be utilized that measures the individual employee’s knowledge and readiness to provide assistance. It is anticipated that this training will be administered and monitored by the Training section of the Human Resources Dept. A prototype of this training is attached hereto as Tab #1. Without limitation, the training will feature the following:

- a. All new casino and casino related employees will be educated on Responsible Gambling and Problem Gambling and will be required to be re-trained annually;
- b. The Responsible Gambling Committee will be required to participate in related training quarterly;
- c. Communications programs for employees to improve their understanding of Responsible Gambling and related policies and procedures will be implemented;
- d. Information on Responsible Gambling awareness including the HOPEline number will be posted in various places where employees congregate;
- e. The training objectives are clear to the learners, including but not limited to identification of possible problem or compulsive gambling;
- f. The training includes content that answers the questions: (1) what is chance and randomness? (2) Is there a link between misunderstanding the concept of chance and excessive gambling? (3) How does one recognize the symptoms of this illness? (4) How will the employee intervene if they decide to do so?
- g. A second level of training will be provided to designated casino employees, who

Exhibit X.A.3

- will be taught skills and procedures required of them for assisting patrons who may have problems with gambling;
- h. A third level of training specific for designated casino employees who would be responsible for initiating conversations with patrons who may have a problem will be implemented and reviewed annually;
 - i. There will be a monitoring and verification process in place to ensure all required employees complete required training and re-training;
 - j. There will be an evaluation process in place to measure the effectiveness of the training program;
 - k. Employee Assistance Program (EAP) Counselor(s) will be trained to assess and screen for problem gambling among employees.

2.) Departmental Training

In addition to the company-wide training described in paragraph A. above, each department having responsible gaming related responsibilities will ensure that their respective employees are thoroughly trained on those responsibilities. Specific departments have duties and responsibilities as set forth below:

1. **Security Department-** Security is responsible for the enforcement and reporting of operational efforts, which relate to the prevention of underage gambling, intoxicated gambling, and gambling by excluded and self-excluded persons. This includes identifying and removing underage, intoxicated, excluded and self-excluded persons.
2. **Surveillance Department-** Surveillance is responsible for the closed circuit television monitoring of all gaming areas, areas off the gaming floor where contests or tournaments are conducted and the food and beverage areas in the facility. The Director of Surveillance and personnel assigned to surveillance duties are responsible for monitoring these areas for patron intoxication, patrons appearing under the age of 21 who are on the gaming floor and/or are engaged in gaming activities and visual identification of excluded and self-excluded persons.
3. **Slot Department- The** Slot Department is responsible for attempting to recognize suspected compulsive or problem gambling behavior and identification of underage and intoxicated individuals and the prevention of underage and intoxicated gaming. Slot attendants are also responsible for verifying identification of individuals prior to payment of a hand paid jackpot to ensure that the individual is not underage or on the self-exclusion or exclusion list.
4. **Table Games Department-** The Table Games Department is responsible for attempting to recognize suspected compulsive or problem gambling behavior, the identification of underage and intoxicated individuals, and the prevention of underage and intoxicated gaming. Table Games employees are also

Exhibit X.A.3

- responsible for verifying identification of individuals to ensure that an individual is not underage.
5. **Cashier's Cage-** Cashier's Cage is responsible for preventing underage individuals and individuals on the exclusion and self-exclusion lists from cashing checks and conducting certain transactions at the cage.
 6. **Marketing Department-** The Marketing Department is responsible for ensuring that no individuals who are underage or are on the excluded or self-excluded lists receive player cards, player club privileges, complimentary services or direct mail marketing materials. Marketing is responsible for ensuring that excluded and self-excluded individuals are entered into the player tracking system, and flagged as soon as possible after notification of exclusion has been received.
 7. **Food and Beverage Department-** The Food and Beverage is responsible for preventing the service alcoholic beverages to visibly intoxicated guests and underage individuals and for notifying Security to prevent persons from gaming after having been determined to be visibly intoxicated.

Policy on Assisting Patrons Who May Have a Gambling Problem

To the extent that a patron is willing to receive information, Traditions Resort & Casino will provide persons suspecting they may have a gambling problem with information and assistance in connection with local support services. To that end, Traditions Resort & Casino will ensure that:

1. Clear procedures will be in place for assisting a patron who may have a gambling problem.
2. All casino staff will be aware of the policies and procedures for assisting patrons.
3. All casino staff will be knowledgeable about the helpline and self-exclusion and able to direct patrons seeking information.
4. Designated staff can provide assistance in a comfortable setting such as the RGRC private office.
5. Local treatment resources, Gamblers Anonymous information and other support service information is provided to the patron in a form that can be taken home for review.
6. If the patron is interested and willing, a direct connection will be made with the appropriate local treatment or self help resource.
7. A process and system for recording a tracking individual level problem gambling related issues will be developed with the intention of using the data to inform the effectiveness and improvement of the overall Responsible Gambling program's performance.