



***Racing
Victoria***

VICTORIAN BOOKMAKERS' POLICIES

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Purpose

The purpose of these Bookmakers Policies is to provide guidance and direction to Registered Victorian on-course Bookmakers in respect of:

- (a) Racing Victoria's (RV) process for assessing and approving applications by a Bookmaker for bookmaker stand allocations, including relevant criteria and factors which RV uses to consider applications;
- (b) the sale and transmission of a Bookmakers' business;
- (c) Bookmaker Partnerships and companies;
- (d) other matters relevant to the operations of Bookmakers and their employees at race meetings, including but not limited to, the use of Approved Substitutes, the use of the internet and computer betting systems, APN pricing and transferred or cancelled race meetings.

General Principle

As a general principle, all Licensed Bookmakers are expected to:

- (a) conduct their business with integrity;
- (b) act with due care, skill and diligence;
- (c) maintain adequate financial controls and resources;
- (d) have due regard to the interests of customers and treat them fairly;
- (e) have due regard to the information needs of customers, and to communicate with them in a way that is clear, not misleading, and allows them to make a properly informed judgment about whether to gamble;
- (f) act in accordance with the Rules and Policies of RV and the Victorian Commission for Gambling and Liquor Regulation (VCGLR) as they apply to Bookmakers and Licensed persons; and
- (g) act in accordance with the principles of the Bookmakers Code of Conduct as approved by the VCGLR.

Definitions

The following definitions are used in the Bookmaker Policies contained in this document:

“ABS Provider” means an individual who is party to a contractual arrangement with a Bookmaker to create, maintain and provide an ABS.

“ABS Review Committee” means the body which determines the approval of an ABS. Pursuant to Club Bookmakers’ Licence Rule 24, RV has delegated its powers under Club Bookmakers’ Licence Rule 13.1 to the ABS Review Committee.

“Accredited Testing Provider” is an independent third-party tester, approved by RV, who is required to use the RV Test Report when undertaking tests of betting systems.

“Agency Stand” means an additional stand operated by a Bookmaker on the same racecourse without requiring additional guarantees.

“AFSA” is the Australian Financial Security Authority.

“APRA” is the Australian Prudential Regulation Authority.

“Approved Betting System” or **“ABS”** has the same meaning as in the Club Bookmakers’ Licence Rules 2010 and includes the following systems expressly approved by Racing Victoria for use by Bookmakers:

- (a) Computerised Betting System;
- (b) Internet Betting System; or
- (c) Telephone Betting System.

“Approved Substitute” means a Bookmaker’s Key Employee who is currently registered by the VCGLR and has been approved by Racing Victoria pursuant to Section 91AB of the Racing Act and Licence Rule 9 to carry on the business of a Bookmaker during a period of absence by the Bookmaker.

“Area” means one or more parts or areas of a racecourse which Racing Victoria determines from time to time for the conduct of the business of a Bookmaker

“Area Allocation” means the allocation by Racing Victoria of a Bookmaker to a particular Area of a racecourse where that Bookmaker may conduct race-day bookmaking.

“Assessable Turnover” has the meaning as defined in ~~2.2.1~~ Schedule 1 to the Bookmakers’ Licence Levy Rules 2012.

“ASIC” is the Australian Securities & Investments Commission.

“Associate” means the following:

- (a) a person who holds or will hold any relevant financial interest, or is or will be entitled to exercise any relevant power (whether in right of the person or on behalf of any other person) in the ABS Provider's business, and by virtue of that interest or power, is able or will be able to exercise a significant influence over or with respect to the management or operation of that business; or
- (b) a person who is or will be an executive officer, whether in right of the person or on behalf of any other person, of the ABS Provider's business; or
- ~~(a)~~(c) if the ABS Provider is a natural person, a person who is a relative of the ABS Provider.

"Betting Supervisor" means the person appointed as such by Racing Victoria, and any other person to whom duties have been delegated by the person so appointed.

"Bookmaker" means a bookmaker registered with the VCGLR and licensed by Racing Victoria in accordance with the Racing Victoria Club Bookmakers' Licence Rules

"Bookmakers' Key Employee" means the holder of a current certificate of registration as a Registered Bookmaker's Key Employee under Part 5A of Chapter 4 of the Gambling Regulation Act.

"Bookmakers' Licence Levy Rules" means the Bookmaker Licence Levy Rules made pursuant to section 91B and approved pursuant to section 91D of the Racing Act.

"Caulfield Semi-Feature Meeting" means the following race meetings held by the Melbourne Racing Club at Caulfield Racecourse:

- (a) the Underwood Stakes race meeting;
- (b) the CF Orr race meeting;
- (c) the Blue Diamond Stakes race meeting; and
- (d) any other race meeting as notified by Racing Victoria at the commencement of a Racing Season.

"Club" means a thoroughbred racing club in Victoria that:

- (a) is registered by Racing Victoria under the Rules of Racing; or;
- (b) conducts a race meeting that is registered by Racing Victoria under the Rules of Racing.

"Computerised Betting System" means a system approved by Racing Victoria for use by Bookmakers, which may be comprised of computer equipment and software, and by which bets may be recorded and betting tickets issued.

“Country Racecourse” means all non-Metropolitan racecourses in Victoria.

“Country Race Meeting” means a race meeting other than a Metropolitan Race Meeting.

“Executive officer” in relation to an incorporated entity, means:

(a) a director, secretary or other officer (by whatever name called); or

(b) any other person who is concerned with, or takes part in, the management of the entity, whether or not the person’s position is given the name of executive officer.

“Internet Betting Rules” means the rules of that name made by Racing Victoria and approved by the Minister pursuant to section 4A of the Racing Act as amended from time to time.

“Internet Betting System” has the meaning given in the Internet Betting Rules.

“Key Employee” has the same meaning as **“Bookmakers’ Key Employee”**.

“Key Performance Indicators” means the specific criteria used to assess the performance of Bookmakers.

“Licence” means a club bookmaker’s licence as defined in section 84 of the Racing Act which is granted to a Bookmaker under the Racing Victoria Club Bookmakers’ Licence Rules 2010.

“Licence Levy” means the levy payable by the holder of a Licence or Approved Substitute in accordance with the Bookmakers’ Licence Levy Rules.

“Local Meeting” means the race meeting being conducted at the Racecourse at which the Bookmaker is conducting the bookmaking business on that day.

“Manual Betting System” means any betting system, other than an Approved Betting System, that has been expressly authorised by RV in accordance with Club Bookmakers’ Licence Rule 13.3, for use by Bookmakers in the course of their bookmaking business.

“Metropolitan Racecourse” means one of Flemington, Caulfield, Moonee Valley or Sandown.

“Metropolitan Race Meeting” means:

- (a) a race meeting conducted in Victoria by Victoria Racing Club, Melbourne Racing Club or Moonee Valley Racing Club; and a race meeting conducted elsewhere in Australia or outside Australia; and
- (b) designated as the equivalent of a Victorian Metropolitan Race Meeting by Racing Victoria.

“Partnership” means a bookmaking partnership where a Bookmaker has been approved by the Commission for approval for either or both of the following-

- (a) to be a member of a bookmaking partnership; or
- (b) to be a member of any other partnership where the business of that Bookmaker as a Bookmaker or any substantive parts of that business are conducted jointly with other Bookmakers.

“Picnic Race Club” means a Club which conducts a Picnic Race Meeting.

“Picnic Race Meeting” means a race meeting designated as such by Racing Victoria.

“Racecourse” means a racecourse licensed under section 24(1) of the Racing Act for horse racing.

“Racing Act” means the *Racing Act 1958 (Vic)* as amended from time to time.

“Racing Season” means the annual Victorian thoroughbred racing season from 1 August to 31 July inclusive.

“Rails” means the Area of the Racecourse as defined by Racing Victoria from time to time where Bookmakers are required to accept bets from customers risking to lose a higher amount than for those Bookmakers fielding off the Rails, as specified in the Rules of Racing.

“Relative” in relation to a person, means:

- (a) the spouse or domestic partner of the person; or
- (b) the mother or father of the person; or
- (c) a son or daughter of that person who has attained the age of 18 years.

“Relevant Financial Interest” in relation to an ABS Provider, means:

- (a) any share in the capital of the ABS Provider; or
- (b) any entitlement to receive any income derived from the ABS Provider’s business; or
- (c) any entitlement to receive any payment as a result of money advanced, or

where an ABS Provider or its ultimate parent company is listed on the Australian Securities Exchange or another similar exchange, will not mean any shareholder of the ABS Provider or its ultimate parent company (as applicable), or any other person, unless the relevant financial interest is such that it is equivalent to a 10% or greater shareholding in the capital of the ABS Provider or its ultimate parent company (as applicable) or RV otherwise determines.

“Relevant Power” means any power, whether exercisable by voting or otherwise and whether exercisable alone or in association with others:

- (a) to participate in any directorial, managerial, or executive decision; or

(b) to elect or appoint any person as an executive officer.

“Revenue” has the meaning as defined in the Bookmakers’ Licence Levy Rules 2009.

“RV” means Racing Victoria Ltd ACN NO. 096 917 930.

“RV Test Report” is a report constructed by RV incorporating the requirements from the Victorian Commission for Gambling and Liquor Regulation’s Wagering and Betting System Requirements Document dated April 2012.

“Spring Racing Carnival Meetings” means those Metropolitan Race Meetings and Country Race Meetings specified by Racing Victoria at the commencement of each Racing Season.

“Stand Allocation” means the allocation of a Bookmaker stand by Racing Victoria to a Bookmaker in an Area.

“Telephone Betting Rules” means the rules of that name made by Racing Victoria and approved by the Minister pursuant to section 4A of the Racing Act.

“Telephone Betting System” has the meaning given in the Telephone Betting Rules.

“Work” means a meeting at which a Bookmaker has operated a stand on-course. In the case of Bookmakers operating more than one stand at a Racecourse on the one day, only one Work will be recorded for that Bookmaker or Partnership for the day.

SECTION A: PROCESS FOR THE ALLOCATION OF BOOKMAKER STANDS

1. Introduction

RV is responsible for allocating bookmaker stands to Bookmakers at Metropolitan and Country Race Meetings.

This Section A sets out the process and guiding criteria for the allocation by RV of Bookmaker stands. Notwithstanding the processes and criteria set out below, RV retains absolute discretion in relation to decisions relating to the allocation of stands to Bookmakers.

RV, by allocating a stand to a Bookmaker for a period, makes no warranty or representation to a Bookmaker as to the allocation of stands in any future period, except as provided for in this Section A.

For the avoidance of doubt, by making a Stand Allocation, RV does not grant to (or purport to grant to), or otherwise recognise, any ownership right of, a Bookmaker in a Bookmaker Stand.

Note: Where a matter or issue arises which is not contemplated by this Section A, RV may consider and determine that matter or issue in its reasonable discretion.

2. Metropolitan Racecourse and Race Meetings

The process for obtaining a Stand Allocation at a Metropolitan Racecourse or Race Meeting has two steps:

- (a) the allocation of a Bookmaker to a particular area (Area Allocation); and
- (b) the allocation of a stand to the Bookmaker in that area (Stand Allocation)

2.1 Minimum Eligibility Criteria for Metropolitan Racecourses

To be eligible to receive an Area Allocation at a Metropolitan Racecourse, a Bookmaker must satisfy the following:

- (a) **Financial Assets:** have at least 150% in net personal assets of the guarantee relevant to the position as follows:

	Guarantee	Minimum Net Assets (150% of guarantee)
Metropolitan Guarantee	\$75,000	\$112,500
Telephone Betting Guarantee	\$100,000	\$150,000
Rails Guarantee	\$150,000	\$225,000

- (b) **Minimum Works:** A Bookmaker is required to Work a minimum of 33 percent of Race Meetings at each Racecourse they were allocated to Work in the previous Racing Season.

This minimum Work requirement applies to each stand allocated to a Partnership or company at a particular Racecourse. For example, if a Partnership or company is allocated more than one stand at a Racecourse they must ensure that each stand is operated at that Racecourse at a minimum of 33 percent of meetings.

2.2 Application for Area Allocations

Prior to the commencement of a new Racing Season, registered Bookmakers apply to RV for a licence (or renewal of their licence). As part of that application, Bookmakers apply to be allocated to a particular area at:

- (a) a Metropolitan Racecourse(s) (or particular race meeting(s) at a Metropolitan Racecourse(s)); and/or
- (b) Country Racecourses.

2.3 Metropolitan Area Allocation Process

RV receives the following applications for Area Allocations in respect of Metropolitan Racecourses:

- (a) initial applications for Area Allocations to existing areas at a Metropolitan Racecourse by either:
 - (i) licensed Bookmakers who did not hold an Area Allocation at a Metropolitan racecourse in the previous season; or
 - (ii) a newly licensed Victorian Bookmaker;
- (b) applications from licensed Bookmakers for retention of the Area Allocation of the previous Racing Season's area at a Metropolitan Racecourse.

RV allocates Bookmakers to Areas according to various criteria (see [2.5](#) below).

Once allocated by RV, Bookmakers maintain their Area Allocations for the Racing Season (or other specified period), subject to:

- (a) a Bookmaker meeting ongoing performance requirements throughout the Racing Season (see [2.5](#) below); or
- (b) in exceptional circumstances, and in consultation with the club conducting the meeting, RV using its discretion to move, promote, demote, or otherwise re-allocate Bookmakers across Areas, or to close an Area or Areas.

2.5 Criteria for Area Allocations at Metropolitan Race Meetings

Applications by Bookmakers for an Area Allocation at racecourses conducting Metropolitan Race Meetings are considered by RV with reference to:

- (a) certain minimum eligibility criteria (see 2.1 above);
- (b) Bookmaker Key Performance Indicators (**KPIs**) (see 2.7 below); and
- (c) comparative Assessable Turnover performance of other Bookmakers applying for similar allocations (see 2.8 below).

In addition, Bookmakers seeking to retain the same Area Allocation as the previous Racing Season are given priority over new applicants for those Area Allocations, except where:

- (a) RV considers that a Bookmaker should be allocated to an area ahead of another Bookmaker based on Assessable Turnover or KPIs; or
- (b) in exceptional circumstances, RV decides to use its discretion to allocate a Bookmaker to a particular Area for a specified period.

2.6 Agency Stands

Bookmakers are only permitted to operate an Agency Stand at RV's absolute discretion.

A Bookmaker who has been permitted to operate an Agency Stand is not entitled to retain that position for any Racing Season in the future or part thereof.

Where RV allocates an Agency Stand to a Bookmaker, that stand must be operated by a Bookmaker's Key Employee, and be located away from the Area where the Bookmaker's principal stand is located (for example in a restaurant, marquee or lawn area of the course, or The Forum at Flemington).

Agency Stand Allocations are not transferrable by the formation of a Partnership, sale of a Bookmakers' business or the dissolution of an existing Partnership.

2.7 Bookmaker KPI's

In considering the grant of an Area Allocation, RV considers certain KPIs relevant to individual Bookmakers. These include:

- (a) number of Works;
- (b) comparative Assessable Turnover performance; and
- (c) market percentages offered.

2.8 Comparative Assessable Turnover Performance

- (a) Definition of Assessable Turnover

For the purposes of comparing Assessable Turnover, RV calculates Assessable Turnover is by reference to the Assessable Turnover of a Bookmaker at a Racecourse in the prior Racing Season.

(b) Applications for Renewal of Area Allocations

In considering an application by a Bookmaker for the renewal of an Area Allocation for a Racing Season, RV may consider a Bookmaker's previous Racing Season's Assessable Turnover by comparing that Bookmaker's Assessable Turnover with the previous Racing Season's total Assessable Turnover of Bookmakers in that Area .

(c) Applications from Bookmakers previously licensed outside Victoria

Where a Bookmaker who was previously licensed outside Victoria applies for a Metropolitan Allocation, RV may consider evidence from that Bookmaker regarding their Assessable Turnover. Such Bookmakers may be allocated stands at RV's absolute discretion subject to availability.

2.9 Applications for New Area Allocations or Stands at Metropolitan Meetings

In the event that new Areas or stands become available at a Metropolitan Racecourse or specific race meetings, all existing Bookmakers who are currently servicing that Racecourse are to be given the first option of filling the positions, in order of number of Works at that track and, then, Assessable Turnover performance for the previous 12 months, subject to them satisfying the eligibility and minimum criteria as defined at [2.1](#). When completing the Spring Racing Carnival Meetings any Works/Assessable Turnover calculations required for new/vacant allocations will be calculated over the 12 month period prior to the 1st August of that same year.

For the avoidance of doubt and for the purpose of this Part 2.9:

(a) positions in new Areas may be allocated to all eligible Bookmakers, including Bookmakers fielding on interstate racing and Partnerships/Corporations;

(b) in calculating Works for Partnerships/Corporations Works are calculated from the date of approval by the RV Board of the Partnership/Corporation Licence.

The Club which creates the new Area may also specify minimum criteria in accordance with their requirements for that Area including but not limited to equipment, presentation, bet limits, dress standards and standards of customer service.

3. Country Racecourses and Race Meetings

3.1 Minimum Requirements & Guarantees at Country Racecourses

To receive an Area Allocation at a Country Racecourse, a Bookmaker must satisfy the following:

(a) **Financial Assets:** have at least 150% in net personal assets of the guarantee as follows:

	Guarantee	Minimum Net Assets (150% of guarantee)
Country Guarantee	\$25,000	\$37,500
Telephone Betting Guarantee	\$100,000	\$150,000

3.2 Allocations for Country Race Meetings

Applications by Bookmakers for an Area Allocation at Country race meetings are sought from eligible Bookmakers and considered by RV on a monthly basis.

Meetings will be allocated to Bookmakers with reference to previous Works at that Racecourse and comparative Assessable Turnover.

Bookmakers will only be allocated stands at Country Racecourses and Race Meetings if they have completed and submitted the monthly application on the Stand Allocation application form.

Bookmakers must submit their monthly application by the due date in order to be allocated stands at country race meetings. If a Bookmaker wishes to apply for two or more Country Race Meetings scheduled on the same day they are required to list their order of preference on the application form.

3.3 Calculation of Works at Country Meetings

In deciding monthly Stand Allocations for Country Race Meetings, the total number of Works by a Bookmaker at that Racecourse for the previous 12 months (or a minimum of six meetings), will be used to determine a ranked order of entry. When determining the ranked order of entry RV will calculate the Works/Assessable Turnover from the 3rd of the month. Eg. The draws for May 2016 are completed at the start of April 2016. Therefore, RV will calculate Works/Assessable Turnover over the prior 12 months from the 3rd April. This date period would be used for all the May draws except where a club does not conduct at least 6 meetings within this period. In this scenario RV will use the last 6 meetings for that club prior to the 3rd April 2016.

Should two or more Bookmakers have an equal number of Works, preference will be given to the Bookmaker with the highest Assessable Turnover for the previous 12 months at that Racecourse. If a Bookmaker does not have any Works at that Racecourse then the Bookmaker's total Assessable Turnover at all venues for the previous 12 months will be used to assess the highest rated Bookmaker.

When considering Stand Allocations in main ring positions, only previous Works/Assessable Turnover in the main ring will be included in the calculation of Works/Assessable Turnover.

3.4 Bookmakers Allocated Stands at Metropolitan and Country Race Meetings

A Bookmaker who has been allocated a stand at both a Country and a Metropolitan Race Meeting on the same day may choose which meeting to attend, unless otherwise directed by RV.

Where a Bookmaker elects or is otherwise directed to attend either the Country or Metropolitan Race Meeting, one Work only will be recorded for the relevant meeting which the Bookmaker attends.

3.5 Applications for New Area Allocations or Stands at Country Race Meetings

In the event that new Areas or stands become available at a Country Racecourse, all existing Bookmakers who are currently servicing that Racecourse, will be provided with the first option of filling the position(s). Allocations will be made in order of, first, number of Works at that track and, secondly, Assessable Turnover performance for the previous 12 months (or minimum of six race meetings), subject to them satisfying the eligibility and minimum criteria as defined at [3.1](#).

For the avoidance of doubt and for the purpose of this Part 3.5:

(a) positions in new Areas may be allocated to all eligible Bookmakers, including Bookmakers fielding on interstate racing and Partnerships/Corporations;

(b) in calculating Works for Partnerships/Corporations, Works are calculated from the date of approval by the RV Board of the Partnership/Corporation Licence.

The Club which creates the new Area may also specify minimum criteria in accordance with their requirements for that Area including but not limited to equipment, presentation, bet limits, dress standards and standards of customer service.

4. Meeting Emergencies

RV may designate a Bookmaker or Bookmakers to be Emergency Bookmakers for individual Race Meetings or Areas. Subject to this policy, Emergency Bookmakers are used by RV to fill vacancies arising from the unavailability of a Bookmaker who had been allocated to a stand.

The number of Bookmakers designated as emergencies for any individual Race Meeting or Area will be determined at the absolute discretion of RV. Emergencies are allocated in accordance with Bookmakers' Works and Thoroughbred Assessable Turnover at that Racecourse for the previous 12 months.

Where RV allocates an Emergency Bookmaker to a stand the Emergency Bookmaker is allocated to the stand made vacant by the Bookmaker who was unavailable.

If any stands remain vacant following the allocation of an Emergency Bookmaker (or Bookmakers), RV may, at its discretion, move existing Bookmakers from stands located at the ends of an Area to the vacant stands.

4.1 Metropolitan Meetings

RV may in its absolute discretion allocate one or more Bookmakers as an Emergency Bookmaker to Metropolitan Race Meetings or Areas for which they are eligible to work as follows:

- (a) two “Paddock/Ring Emergency Bookmakers” to field as an emergency at a particular meeting or meetings where:
 - (i) a stand which has been allocated to another Bookmaker becomes available in the Paddock/Ring Area; and
 - (ii) the number of Bookmakers in the Paddock/Ring is below 66 percent of the Stands allocated to the Paddock/Ring Area by RV for that meeting (or those meetings); and
- (b) two “Rails Emergency Bookmakers” to field as an emergency to the Rails Area where:
 - (i) a stand which has been allocated to another Bookmaker becomes available in the Rails Area; and
 - (ii) the number of Bookmakers in the Rails Area is below 66 percent of the Stands allocated to the Rails Area by RV for that meeting (or those meetings).

If a stand becomes available in an Area outside the Paddock/Ring or Rails and the Stand Allocations in that Area have fallen below 66 percent, the stand will be offered to Bookmakers working in the Rails or Paddock/Ring. This allocation will be based on:

(a) first, number of Works; and then

(b) Assessable Turnover,

at that Racecourse for the previous 12 months. Where a Bookmaker elects to accept such an offer, that Bookmaker’s existing stand is vacated and may be filled by an Emergency Bookmaker in accordance with this Part 4.1.

Notwithstanding the above, under this policy, for all Race Meetings that include a Group 1 race, there will be no requirement for Areas to fall below 66 percent before an emergency is allocated.

4.2 Caulfield Semi-Feature and Spring Carnival Race Meetings

If a Rails Bookmaker that has been allocated one of the Rails stands 1-12 withdraws from a Caulfield Semi-Feature Meeting or a Spring Racing Carnival Meeting, the Rails Bookmaker on the stand furthest from the track (as

determined by RV) on Stands 16-19 will move across to the vacated stand and the Emergency Bookmaker will be allocated the vacated stand 16-19.

4.3 Country and Picnic Race Meetings

Emergency Bookmakers may also be allocated to Country and Picnic Race Meetings at RV's absolute discretion. Emergency positions will be allocated to the highest-ranked Bookmakers in accordance with 3.3 above.

RV will allocate the stand which was allocated to the Bookmaker who is not attending the meeting to the Emergency Bookmaker who accepts the vacant position. Should RV be unable to replace the absent Bookmaker due to short notice (less than 2 business days), then the first emergency will be credited with a Work as if they had attended that meeting. If there is a vacant stand (or stands) still available after Emergency Bookmakers have been allocated, RV may, in its discretion, move existing Bookmakers from stands located at the ends of an Area to the vacant stands.

5. Stand Allocation Process

This Part 5 deals with the allocations of Stands once a Bookmaker has been allocated to an Area.

5.1 Metropolitan Meetings

For Metropolitan Meetings, Stand Allocations in each individual Area of a Racecourse will be determined on a random rotational basis for all race meetings other than on the Rails at those nominated Metropolitan Race Meetings occurring during the Spring Racing Carnival as specified by RV and communicated to Bookmakers at the commencement of each licence period, when a preferential draw based on Assessable Turnover at that Racecourse for the previous Racing Season will be conducted, as outlined in 5.3 below.

5.2 Country Meetings

For Country race meetings, Stand Allocations in the main betting ring will be determined on a random basis for all race meetings other than for those nominated major Country race meetings as specified by RV and communicated to Bookmakers at the commencement of each licence period, when a preferential draw based on Works at that Racecourse will be conducted, as outlined in 5.4 below.

In respect of allocations for stands outside of the main betting ring (e.g. lawn, marquees, grandstands):

(a) subject to (b) below, such allocations will be based on the highest number of Works and Assessable Turnover within that Area over the previous 12 months or 6 meetings (in the case where there has not been a meeting at that Racecourse in the previous 12 months);

(b) for Country Club Cup meetings, where a Bookmaker worked outside the main betting ring at that Country Club's Cup meeting in the previous year,

RV will, except in exceptional circumstances and as far as is reasonably possible, allocate that same Stand to the Bookmaker at the Club's Cup meeting the following year irrespective of the Bookmaker's number of Works or Assessable Turnover. This decision will be based on the availability of Stands, may be made in consultation with relevant Club and remains at RV's absolute discretion.

5.3 Rails Stand Allocation Process for Major Metropolitan Meetings of the Spring Racing Carnival

For the major metropolitan race meetings of the Spring Racing Carnival as specified by RV at the commencement of each racing season, Stand Allocations in the Rails Area will be determined in accordance with the previous Racing Season's Assessable Turnover (as defined at 2.8). The Bookmaker with the highest Assessable Turnover at that Racecourse for the previous Racing Season will have the first opportunity to select their Stand Allocation followed by the next highest and so forth.

5.4 Stand Allocation Process for Major Country Race Meetings

For major Country race meetings as specified by RV at the commencement of each racing season, Stand Allocations for the specified meeting(s) will be determined in accordance with the previous 12 months Works at that Racecourse.

In the case of two Bookmakers having the same number of Works at that Racecourse then Assessable Turnover (as defined at 2.8) for the previous 12 month period at that Racecourse will be used to determine a ranking order of Bookmakers. The Bookmaker with the highest ranking at that Racecourse for the previous 12 months will have the first opportunity to select their Stand Allocation followed by the next highest and so forth.

Bookmakers will be offered the opportunity to select their stand position in Works and Assessable Turnover preferential order at the time when all Stand Allocations are being conducted for the relevant meetings.

5.5 Transferred Race Meetings

If Stand Allocations have been conducted for a race meeting and that meeting is then transferred to another Racecourse, RV will continue applying Stand Allocations as if the race meeting was being held at the Racecourse from where the race meeting was transferred from.

Alternatively, if the race meeting is transferred to another Racecourse prior to stands being allocated, then the Stand Allocations will be conducted based on the Racecourse the meeting has been transferred to.

SECTION B: TRANSMISSION OF A BOOKMAKER'S BUSINESS

6. Transmission of a Bookmaker's Business

Licensed Bookmakers may enter into legally enforceable arrangements with other licensed Bookmakers which provide for the sale and purchase of a bookmaking business or the disposal and acquisition of interests in a bookmaking company or partnership which affects a disposal and acquisition of such a business (Transmission of a Bookmaker's Business).

Where there is a Transmission of a Bookmaker's Business, RV will facilitate that the acquirer of such a business will have access to the Bookmaker stand that was allocated and operated by the Bookmaker that disposed the business for the balance of the licensing period in which the disposal of the business was completed.

A purported "transfer" of a Bookmaker stand, separate to the Transmission of a Bookmaker's Business, will not be recognised by RV.

If the Vendor Bookmaker is part of a Partnership or Company (and that Vendor Bookmaker sells their share of the Partnership or Company) they shall not be entitled to rejoin or work as a Key Employee for that Partnership or Company unless RV provide written consent.

A Bookmaker's stand that is acquired through a Transmission of a Bookmaker's Business is subject to annual review by RV in accordance with its service, performance and integrity policies during the Bookmakers' licence renewal process for the next licensing period immediately after the licensing period in which the disposal of the business was completed.

6.1 Process for Implementation of Transmission of Bookmaker's Business

In considering an application to RV to facilitate the re-allocation of Bookmakers' stands following the transmission of a Bookmaker's business from one Bookmaker to another, RV will apply the following process:

- (a) Bookmakers are required to provide RV with written evidence (to RV's satisfaction) of a legally binding contract for the transmission of a licensed Bookmaker's entire business to another licensed Bookmaker. RV respects the right of Bookmakers to maintain confidentiality in business sale prices, and allows purchase prices to be masked to protect commercial confidentiality. RV will not facilitate the re-allocation of Bookmaker stands where a contract contains provisions which are contrary to R V's Bookmaker Rules or policies.
- (b) Both parties to a sale of a Bookmaker's business are required to execute and provide to RV a "Transmission of Bookmaker Business Form" together with evidence of the relevant legally binding contract for the sale of the business.
- (c) Vendor Bookmakers who enter into legally binding contracts for the transmission of their bookmaking business may wish to continue

bookmaking under their licence, and may re-apply for stand allocations. Such applications will be treated in accordance with RV's stand allocation guidelines and allocations will be subject to stand availability. Further, a Bookmaker's performance prior to the relevant business sale (including turnover and works history) will not be relevant to decisions made in relation to future stand allocations.

- (d) RV requires a period of approximately 10 working days for the consideration of applications to facilitate the re-allocation of Bookmaker stands to the Bookmaker acquiring the vendor Bookmaker's business.

SECTION C: BOOKMAKER PARTNERSHIPS AND CORPORATIONS

7. Bookmakers Partnerships and Corporations

Bookmakers may form Partnerships or Corporations to conduct their bookmaking business, whether as sole directors or in partnerships.

Subject to any additional requirements or conditions imposed by RV, an applicant for a Bookmaker Partnership/Company licence must first be registered with the VCGLR as an individual Bookmaker in order to be approved.

7.1 Bookmakers to Determine Commercial Matters

Subject to RV, or the VCGLR using its absolute discretion to approve or not approve a person to be registered as a Bookmaker and the formation of a Partnership/Corporation, Bookmakers are freely permitted to determine all commercial aspects of the formation and operation of a partnership/corporation (subject to applicable laws). The number of partners/directors, the quantum of ownership interest, acquisition value, contribution of assets and liabilities, distribution of profits, operational matters, staffing, method of betting etc., are all matters to be determined by the partners/directors.

7.2 Stand Allocations Vest in Partnership/Corporations

Where a Bookmaker becomes part of a Partnership/Corporation, a Bookmaker must vest their Stand Allocations(s) to the extent that such allocation has been allotted in accordance with the Stand Allocation Policy into the Partnership/Corporation, subject to the provisos outlined in 7.3 below.

Where there is a change of ownership in a Bookmaker Partnership/Corporation, RV will, in its absolute discretion, facilitate the transfer of any Stand Allocations which had previously been granted to a Bookmaker for the remainder of the racing season within which the change of ownership took place, in accordance with agreement that may have been reached amongst the Bookmakers within that partnership/corporation.

In the case of partnerships being dissolved or wound-up, the affected Bookmaker(s) may make application to RV to be re-allocated stands which had been allocated prior to forming the partnership/corporation as agreed by the Bookmakers who were partners in the business. Should the partner Bookmakers not be able to reach agreement amongst themselves, RV may re-allocate those stand allocations in its absolute discretion.

7.3 No Aggregation of Stand Positions

Bookmakers should not enter into arrangements that result in the locking up of stand capacity, Assessable Turnover dominance, the creation of cartels, or price control/manipulation.

Bookmaker Partnerships/Companies are permitted to operate only one stand position in any one Area, unless otherwise determined by RV.

7.4 Works and Assessable Turnover History

For the purposes of determining the performance history for a Bookmaker Partnership or Company, Works and Assessable Turnover will be calculated at each Racecourse for a new Partnership or Company from the date the Partnership or Company is approved by the RV board.

SECTION D: BOOKMAKER OPERATIONS

8. Bookmakers' Off-Course Premises Approval

8.1 Background

RV is responsible for approving off-course premises for Victorian Bookmakers to make or accept bets at premises other than a racecourse, using a method of communication approved by the Minister under section 4A of the *Racing Act 1958* (Vic) (**the Act**).

Registered Victorian Bookmakers issued with a Club Bookmakers Licence that elect to make an application to RV for the approval of off-course premises pursuant to section 4B of the Act, must complete and submit the 'Application for Approval of Off-Course Premises' Form to RV for approval.

8.2 Conditions of Approval

The following conditions will apply to all approvals of off-course premises:

1. The approved off-course premises must not be open to, or available for use by, the public or a section of the public for any purpose related to betting; and
2. The Bookmaker must comply with any requirements prescribed by the Minister under section 4E of the Act.

Approvals will also be subject to the conditions set out in sections 2.1 to 2.4 below. In addition to the above conditions, if required, RV may make an approval subject to any further conditions. All conditions to which the approval is subject will be specified in the written approval.

RV may vary the conditions of any approval granted to a registered Bookmaker:

- (a) on the written request of the Bookmaker;
- (b) on RV's own motion; or
- (c) following the variation of any requirements prescribed by the Minister under section 4E of the Act.

RV may by written notice, cancel or suspend any approval if the Bookmaker fails to comply with any of the conditions of the approval.

RV may revoke any approval at any time by written notice to the Bookmaker.

8.2.1 Adherence to the Rules and Policies of Racing Victoria

Any approval of off-course premises will be granted on the condition that the Bookmaker agrees to comply with the terms and conditions of the Club Bookmakers' Licence, RV Policies and agrees to be bound by the following rules, as amended from time to time:

- (a) Club Bookmakers' Licence Rules 2010;
- (b) Bookmakers' Internet Betting Rules 2001;
- (c) Racing Victoria's Rules of Racing;
- (d) Bookmakers' Licence Levy Rules 2012;
- (e) Bookmakers' Telephone Betting Rules 2001; and
- (f) Bookmakers' Sports Betting Rules 2007.

8.2.2 Steward and Betting Supervisor Access to Off-Course Premises

Any approval of an off-course premises will be granted on the condition that Stewards and Betting Supervisors will have the power at any time to enter upon the approved off-course premises to:

- (a) inspect, observe and search the premises and also search any licensed person at the premises;
- (b) to examine the premises and any article or thing situated thereon, and take possession of and remove from the premises any article or thing found as the result of the search, and retain the article or thing for such period as Stewards or Betting Supervisors consider necessary; and
- (c) shall have the right to take thereto such persons, articles and things as they consider necessary to exercise these powers.

8.2.3 Transfer of Files

The Bookmaker must transfer all files from his or her computerised betting system to RV at the conclusion of each day. In the event that a Bookmaker does not make or accept bets from the off-course premises on a particular day, the Bookmaker is still required to submit a return to RV for that day.

8.2.4 Live Access

The Bookmaker must provide RV with remote live access to Approved Betting Systems that are operated from an off-course premises.

8.3 Considerations

In considering any application for the approval of an off-course premises, RV will take into consideration the following factors:

- (a) Whether the off-course premises, the subject of the application, is an appropriate premises for the Bookmaker to make or accept bets using an approved method of communication; and
- (b) Whether the Bookmaker applicant and the premises, comply with and are capable of continuing to comply with, any requirements prescribed by the Minister under section 4E of the Act.

In considering the above, RV may have regard to any of the following factors:

- (a) whether the off-course premises are secure;
- (b) the accessibility for Stewards and Betting Supervisors to the off-course premises;
- (c) whether the off-course premises are being used for any purpose other than bookmaking;
- (d) whether the Bookmaker already has an approved off-course premises and if so, whether the Bookmaker has a proposal that adequately addresses factors such as how he or she intends to manage the premises, grant RV access and keep RV informed as to when the premises is being used at any given time;
- (e) whether RV deems any proposal provided in accordance with (d) above to be viable;
- (f) whether the off-course premises has street frontage;
- (g) the location of the off-course premises and whether it is considered a commercial or private residence; or
- (h) the availability of infrastructure to the Bookmaker to allow them to conduct betting in accordance with the Rules.

8.4 Substitutes

A Bookmaker may apply to RV for approval of their key employee as an approved substitute, who will have approval to carry on the business of the registered Bookmaker in the Bookmaker's absence. An application for the approval of a substitute may be for a specified period of time.

8.5 Prohibition on Advertising

Please note that any breach of this prohibition may lead to the imposition of a financial penalty.

In accordance with the Act, Bookmakers, or a person on behalf of a registered Bookmaker, must not publish or caused to be published:

- (a) any prohibited advertising in relation to the approved off-course premises; or
- (b) the address of the approved off-course premises.

Prohibited advertising includes any form of advertising that contains any information, term, expression, symbol or other thing:

- (a) that draws attention to, or may reasonably be taken to draw attention to, the approved off-course premises or the presence of Bookmakers or approved substitutes in the premises; or
- (b) uses a term or expression frequently associated with Bookmakers or betting and associates those terms with the approved off-course premises.

8.6 Offences

Please note that any breach of this prohibition may lead to the imposition of a financial penalty and/or imprisonment.

8.6.1 Offence to breach conditions of approval to operate off-course premises

A Bookmaker who holds an approval for approved off-course premises must not carry on the business of bookmaking at those premises unless it is in accordance with the conditions of that approval as specified by RV, including any requirements specified by the Minister.

8.6.2 Offence to open an approved off-course premises to the public

A Bookmaker, or his or her approved substitute, that holds an approval for an approved off-course premises or any other person is guilty of an offence under the Act if he or she makes or takes a bet from a person who is present at the approved off-course premises.

8.6.3 Right of Appeal

A Bookmaker may appeal a decision by RV to refuse an approval or to vary any conditions of an approval, to the Racing Appeals and Disciplinary Board.

9. Use of Substitutes

Bookmakers applying to RV for a Key Employee to act as an Approved Substitute to carry on the business of the Bookmaker during a period when the Bookmaker is absent must do so by completing the approved form and lodging it with RV for approval. There must be approval granted by RV for a Key Employee to act as an Approved Substitute prior to the Bookmaker commencing business at the Racecourse or approved off-course premises on that day.

An Approved Substitute is subject to the provisions of the relevant Acts in all respects as if the Approved Substitute were a Bookmaker.

Working as a Substitute for a Bookmaker without approval is a breach of the Rules of Racing and is grounds for disciplinary action against both the Key Employee and the Bookmaker.

Unless otherwise approved by RV, Key Employees will only be granted approval to act as an Approved Substitute for one Bookmaker in any Racing Season.

For the avoidance of doubt:

- a Key Employee is not restricted in the number of Bookmakers he or she can work for in any Racing Season;
- a Bookmaker is not limited in the number of Approved Substitutes he or she may employ in any Racing Season. However, a Bookmaker may not,

without the permission of RV, engage a person who has acted as an Approved Substitute for another Bookmaker in that same Racing Season;

- an Approved Substitute is not permitted to employ or engage a Bookmaker to assist in the operation of the bookmaking business whilst the Approved Substitute is acting for another Bookmaker;
- a Key Employee who has acted as an Approved Substitute for a Bookmaker in any Racing Season is unable to work for another Bookmaker when that Bookmaker has employed an Approved Substitute for the day. For example, where Key Employee (Peter) has acted as an Approved Substitute for a particular Bookmaker (Andrew) during a Racing Season, Peter is unable to work for another Bookmaker (Robert) when Robert has employed an Approved Substitute for the day.

10. Multi Venue Betting

All Bookmakers who are in the conduct of operating their licence are permitted to accept bets on any official horse racing event or any other Approved Event as determined by the VCGLR.

Bookmakers may conduct multi venue betting without displaying a separate betting board for each venue. Bookmakers who elect to offer multi venue betting in this format must display the Multi Venue sign, and may accept wagers on any race scheduled in accordance with the Guarantee and license requirements. Patrons may request a quote of a price if the Bookmaker is not displaying odds for the particular race in question. No application is required by a Bookmaker to operate Multi-Venue betting. At country and picnic racecourses a Bookmaker fielding on Interstate racing is permitted to also display a board for the Melbourne metropolitan meeting on that day, if there are less than three local Bookmakers displaying Melbourne prices.

Bookmakers operating at Country or Picnic Race Meetings who are offering markets on both the Local Meeting and Melbourne or interstate meetings must use more than one betting board and commence offering betting on the local races not less than 25 minutes prior to the advertised starting time of each local race, or as otherwise directed by the Betting Supervisor or Steward.

Bookmakers that are allocated a position to operate on Interstate racing at Flemington Racecourse during the Melbourne Cup Carnival are permitted to display prices for Melbourne races in addition to Interstate races.

11. Conduct of Bookmakers and Their Employees at Racecourses

All Bookmakers and their employees operating Bookmaker activities at a Racecourse must:

- (a) comply with the instructions of the Club and the reasonable instructions given by their staff, RV officials and the Betting Supervisor; and

- (b) comply with all applicable laws and regulations which may apply to on-course bookmaking from time to time and all guidelines and codes of conduct which may be issued pursuant to such laws and regulations;
- (c) not indulge in or be associated in any way with any practice that has, or might have, the effect of distorting artificially the betting market or starting price for any race whether by offering false prices on any horse or any other means;
- (d) conduct bookmaking activities from a stand and equipment (including display boards) that is compliant with the specification agreed by RV, the Club conducting the race meeting and the Victorian Bookmakers' Association from time to time;
- (e) keep equipment used in the course of his or her business in a clean, tidy and safe condition, free from clutter. All boxes or equipment not stored within the stand must be removed from the betting area at least thirty minutes before the scheduled time of the first race;
- (f) conduct his or herself and ensure that his or her staff conduct themselves in a proper and orderly manner at all times and conduct business with customers and other authorised personnel in a polite and helpful manner; and
- (d) comply with and ensure that his or her staff comply with any dress code in force in the particular Allocated Area of a racecourse on a raceday as advised by RV or the Club conducting the meeting from time-to-time.

12. Use of Internet on Course by Bookmakers

During a race meeting, a Bookmaker, Bookmakers' Key Employee or any person employed by or assisting the Bookmaker in the course of his or her business must not, without the permission of the Stewards or Betting Supervisor, use, whilst present on the racecourse any mobile telephone, internet-enabled device, radio transmitter, radio transceiver or other appliance, apparatus, instrument or equipment capable of receiving or transmitting information that has not been approved or issued by RV.

This protocol sets out the process to be followed in seeking such approval and the conditions which will be applied when approval is granted.

Any licensed Bookmaker may apply for permission using the approved form to use the internet on course at race meetings. Should permission be granted the following conditions will apply:

- (a) the internet must not be used to receive bets, access emails or to transmit information, unless the Bookmaker has express approval in accordance with the *Bookmakers' Internet Betting Rules 2001*;
- (b) the Bookmaker must only use a device for which permission has been granted and on which has been loaded any monitoring software deemed appropriate by RV;

- (c) the device used to access the internet must be available for inspection by the Stewards or Betting Supervisors at anytime, including but not limited to during race meetings; and
- (d) any other conditions appropriate in the circumstances.

Where there is non-compliance with any of the foregoing conditions, permission to access the internet may be withdrawn immediately.

Bookmakers granted permission to access the internet on course will be required to acknowledge that monitoring software loaded on to the approved computer or other internet-enabled device allows RV to monitor all activity on that computer or device.

13. Approved Computer Betting Systems

A Registered Bookmaker must conduct all betting activities as a Bookmaker using one or more Approved Betting Systems, provided that Bookmaker has obtained the express approval of RV to use such system in accordance with Club Bookmakers' Licence Rule 13.2, unless RV has permitted the use of a Manual Betting System-

Under the Club Bookmakers' Licence Rule 13.2.1, the Bookmaker must apply in writing, in a form specified by RV, for approval to use an ABS.

13.1 Approval of Betting Systems

RV may approve an ABS under Club Bookmakers' Licence Rule 13.2, if the Approved Betting System Provider (ABS Provider) meets the following suitability requirements:

- (a) ABS testing requirements - an ABS must meet certification standards in accordance with RV's Test Report which ensures the betting system meets prescribed technical and reporting requirements.
- (b) Required documentation - and ABS Provider must provide the requisite information, documents as determined by RV (in its absolute discretion) and make associated disclosures to RV regarding the following:
 - (i) criminal and disciplinary history and litigation information of the ABS Provider and its associates;
 - (ii) organisational information of the ABS Provider;
 - (iii) operational and technical capability of the ABS Provider; and
 - (iv) financial capacity of the ABS Provider.
- (c) Racing Disciplinary Assessment - the ABS Review Committee may receive advice from the RV Integrity Services about adverse regulatory issues or integrity concerns regarding the ABS Provider or its associates.

(d) Satisfactory interview with RV

(e) Insurance - the ABS Provider must procure and maintain insurance from an APRA authorised insurer (approved by RV in its absolute discretion) all forms of insurance prudently and reasonably required having regard to the nature of bookmaking services, including:

(i) public liability insurance of not less than \$20 million; and

(ii) professional indemnity insurance of not less than \$10 million.

(f) Signed Deed Poll of Undertakings and Warranties (Deed) - an ABS must provide and comply with a Deed in the form prescribed by RV with respect to the ABS.

(g) Evidence of legal right - an ABS Provider must have the legal right to provide the ABS to Bookmakers if the ABS Provider does not own the ABS.

(h) Additional inquiries - RV may make additional inquiries about the ABS Provider or its associates, including seeking information from other regulators or organisations, such as ASIC or AFSA.

(i) Additional requirements (Internet Betting Systems only) - if the ABS is an Internet Betting System, the ABS Provider must:

(i) ensure that the betting system is tested by an Accredited Testing Provider; and

(ii) obtain independent legal advice from a law firm (which is acceptable to RV) concerning the compliance of the ABS with legislation in any jurisdiction from which wagers are to be accepted. The ABS Provider is to instruct law firm to provide a letter of compliance to RV, in a form specified by RV.

13.2 Duration of Approval

An ABS approval is valid for 1 August to 31 July (subject to suspension, cancellation, or surrender), and is subject to ongoing compliance with the Deed, the terms and conditions of a Bookmaker's licence, RV's Bookmaker Rules, and any other condition as notified by RV from time to time. An ABS Provider must re-apply annually for approval.

13.3 Changes to an ABS

In the event that there is a proposed alteration (including an upgrade) to the operation or function of an Approved Betting System:

(a) a Bookmaker must not use the altered betting system unless such alterations have been expressly approved by RV; and

(a)(b) the ABS Provider must obtain RV's written approval before any proposed alteration is made and advise whether the proposed alteration is routine or significant.

A routine alteration does not require testing by an independent testing provider. However, a significant alteration to an Internet Betting System does require a report from an Accredited Testing Provider. This report must confirm that the ABS continues to meet RV's Test Report.

A Bookmaker who uses an altered ABS betting system which has not been expressly approved by RV may result in the Bookmaker being prevented from operating their Bookmaker activities until such time as the system (including alterations) is approved or an alternative approved ABS approved Betting System is used.

RV may direct that upgrades be made to the ABS approved Betting System in order that the system complies with changes to the *Betting Rules* or *Levy Rules*, Laws or Polices as set down by RV or the government and its agencies from time to time. Should such a change to the betting system be required, Bookmakers must ensure that they upgrade their system within the specified period as notified by RV. Failure by a Bookmaker to comply with the notice to upgrade may result in the Bookmaker being prevented from operating their Bookmaker activities until such time as the upgrade is completed in accordance with the instructions.

13.4 Bookmaker's obligations

It is the responsibility of each bookmaker who wishes to enter into a commercial arrangement with an ABS Provider to:

- (a) conduct its own due diligence regarding the ABS Provider and the suitability of the ABS to its business requirements and circumstances; and
- (b) ensure that it is satisfied with the commercial terms offered by the ABS Provider - including the level of insurance cover held by the ABS Provider - are appropriate and sufficient for the bookmaker's requirements and circumstances.

13.5 Limitation of Liability

RV's approval of a betting system as an ABS does not constitute approval or endorsement by RV of the business methods, or financial or operating systems, employed by the ABS provider during its business.

RV, its directors, officers, employees, agents and contractors accept no responsibility or liability for any claim, loss, damage or expense suffered or incurred by any person or entity, including any bookmaker, either directly or indirectly as a result of or in connection with the conduct of the ABS provider or the operation of the ABS.

14. Compensation for Cancelled Race Meetings

Bookmakers will not be paid compensation for meetings that are cancelled either partially or fully. The affected meeting will however, be credited as a worked meeting for any Bookmaker who was allocated a stand at that meeting.

15. Victorian Official Price (VOP)

15.1 TAB Race Meetings

The VOP is based on the prices displayed by the off course Wagering Service Providers. On 1st September 2016 RV introduced a system to automate the collection and dissemination of the VOP. The VOP operates at all Metropolitan & Country TAB meetings.

15.2 Country Non-TAB & Picnic Race Meetings

At Non-TAB Country & Picnic race meetings the official price will be assessed from all Bookmakers operating in the main betting ring. The price will be assessed by the Bookmakers' Supervisor as the best price available on at least three boards from all Bookmakers where there are eight or more Bookmakers fielding. In the case of less than eight Bookmakers fielding in the main betting ring, the best price available on two boards will be used. In the event that there are three or less Bookmakers, the price will be assessed by taking the best price available from Bookmakers.

16. Inclement Weather

When race meetings are affected by inclement weather, Bookmakers working outside may be provided with the opportunity to transfer to undercover areas providing this does not impact Bookmakers working in other areas and the Club is able to accommodate the move. The Betting Supervisor will be responsible for decisions in respect of this policy in consultation with the Club.

17. Underage Employees

Bookmakers must ensure that all employees or assistants engaged to assist in the operation of their business are at least 18 years of age.

18. Dress Code

18.1 Metropolitan Meetings

Bookmakers and Bookmakers' Employees engaged in betting activities at metropolitan meetings must adhere to the following minimum dress code:

- (a) Dress shoes – no sandals, thongs or athletic footwear permitted or similar appropriate footwear for women;
- (b) Dress trousers or slacks or skirt – no shorts or denims (of any colour) permitted; and
- (c) Business shirt with tie, blouse or similar appropriate attire for women

18.2 Country Meetings (TAB)

Bookmakers engaged in betting activities at country (TAB) meetings must adhere to the following minimum dress code:

- (a) Dress shoes – no sandals, thongs or athletic footwear permitted or similar appropriate footwear for women;
- (b) Dress trousers or slacks or skirt – no shorts or denims (of any colour) permitted; and
- (c) Business shirt (tie optional), blouse or similar appropriate attire for women

Bookmakers' Employees engaged in betting activities at country (TAB) meetings must adhere to the following minimum dress code:

- (a) Dress shoes – no sandals, thongs or athletic footwear permitted or similar appropriate footwear for women;
- (b) Dress trousers or slacks or skirt – no shorts or denims (of any colour) permitted; and
- (c) Business/collared shirt – tie optional, blouse or similar appropriate attire for women

18.3 Picnic and Non TAB Country Meetings

Bookmakers and Bookmakers' Employees engaged in betting activities at country (Non TAB) meetings must adhere to the following minimum dress code:

- (a) Dress shorts, trousers/slacks or skirt – no denims (of any colour) permitted;
- (b) Dress shoes with socks or similar appropriate footwear for women
- (c) Business/collared shirt – tie optional
- (d) Business/smart shirt, blouse or similar appropriate attire for women

19. Bookmakers' Betting Sheets

Bookmakers must display the following coloured sheets when operating on-course:

Local meetings	White sheets
NSW meetings	Green sheets
QLD meetings	Yellow sheets
SA meetings	Pink sheets

For Bookmakers working at country meetings betting on either local or local and Melbourne the correct colours are:

Local meetings	White sheets
Melbourne meeting	Blue sheets
Interstate	As above

The Local Board should be displayed on the left and the Melbourne or interstate board on the right side of the pole.

20. Bookmakers Employing Other Victorian Bookmakers

Bookmakers are permitted to employ other Bookmakers to assist in the operation of their businesses at a Racecourse or at an approved off-course premises, provided that the Bookmaker employing the assisting Bookmaker is present and no Approved Substitute has been employed to work for them at the time.

21. Provisional Race Meeting

Newly licensed Bookmakers will be allocated stands at fifteen (15) provisional race meetings in order to gain experience. These provisional allocations do not count as Works for the benefit of future stand allocations.

22. Bookmaker Financial Position

When RV is considering a license application, Bookmakers are required to have a minimum of \$75,000 in cash assets available for bookmaking purposes. Such amount should be held in an account or accounts by the Bookmaker for a minimum of 12 months, or derived from a current asset which the Bookmaker has held for a minimum period of 12 months immediately prior to the date of the license application.

	Guarantee	Minimum Net Assets
Minimum Net Assets		\$75,000
Metropolitan	\$75,000	\$112,500
Telephone and Internet Betting	\$100,000	\$150,000

Future Double Win/Place	\$100,000	\$150,000
Future Sport	\$100,000	\$150,000
Rails	\$150,000	\$225,000

23. Unclaimed Betting Tickets

The Club Bookmakers Licence Rules 2010 provide as follows:

“20.2 The Directors or the Stewards may revoke or suspend a Licence.....if they are satisfied that the Bookmaker or Approved Substitute: (d) has made default in payment of any bet”

A Bookmaker must pay unclaimed betting tickets within 10 working days of being notified by the VBA or action may be taken against a Bookmaker in accordance with Club Bookmakers Licence Rule 20.2.

24. Day and Night Meetings on the Same Day

Sole Trader Bookmakers may apply to work at both day and night race meetings conducted on the same date provided that a Substitute Application form is submitted and approved in accordance with Clause 8 of these Guidelines, for the Substitute to cover any races the Bookmaker may miss due to travel between the two Racecourses. Sole Traders are not permitted to work at two venues on the same day where race times overlap (eg. day and twilight meetings)

25. Transfer of Files

Bookmakers are required to transfer electronic files to RV by 11 p.m. on each day they operate. These files must contain all information generated from their Computerised or Internet Betting System as required by RV. For the avoidance of doubt, this requirement is made in accordance with Club Bookmaker Licence Rule 13.10. If a Bookmaker operates more than one stand at a particular race meeting then that Bookmaker is required to send End of Day Files from each particular stand.

26. Lost Ticket and Betting Disputes

Bookmakers are required to have in their possession lost ticket and mediation forms for completion on race day.

If a dispute arises which requires mediation, a mediation form will need to be completed and signed by both the Bookmaker and the punter. Any mediation can then be conducted at a mutually convenient time away from a race meeting.

In the event a punter has lost or destroyed their ticket, if a Bookmaker is unable to assist the punter, a lost ticket form will need to be completed and returned to the VBA. Bookmakers are required to keep a lost ticket form in their possession to provide to punters as required.

27. Social Media Policy

Bookmakers are reminded of Racing Victoria's social media policy.

This policy provides people who are holders of licences with Racing Victoria and who use social media as (a) part of their job or (b) in a personal capacity, with guidance as to the expectations where the social media engagement is about Racing Victoria, the racing industry, its people, and other racing related individuals, clubs or organisations. A link to the policy is below;

https://cdn.racing.com/~media/rv/images/racing-and-integrity/social_media_policy_for_rv_licensed_personnel.pdf?la=en