



**RESPONSIBLE GAMING PROGRAM**

---

January 25, 2022

**TABLE OF CONTENTS**

I. OVERVIEW..... 3

II. RESEARCH & RESPONSIBILITY ..... 3

III. PROGRAM INFORMATION & ADVERTISING..... 4

IV. SELF BAR/EXCLUSION PROGRAM ..... 6

V. PREVENTING UNDERAGE GAMBLING AND UNATTENDED MINORS IN THE CASINO..... 7

VI. SERVING BEVERAGE RESPONSIBLY ..... 7

VII. TEAM MEMBER RESPONSIBLE GAMING TRAINING PROGRAM & AWARENESS..... 8

VIII. RESPONSIBLE GAMING COMMITTEE ..... 9

## **I. OVERVIEW**

The Muckleshoot Tribe d/b/a Muckleshoot Casino I & II (the “Casino”) recognizes the importance of responsible gambling as part of its shared responsibility to protect the health, welfare, and safety of the citizens of the Tribe, the State of Washington, and its guests.

The Casino is committed to promoting public awareness, education, and to providing information on available resources to those guests who believe they may have a gambling problem. The Casino maintains a program that allows our guests to voluntarily self-bar themselves from the Casino, which are provided as a service and convenience to our guests.

We understand that for most guests, gambling is a form of entertainment. For others, gambling may cause problems and become uncontrollable. We believe it is our responsibility to be sensitive to our guests and our host community by proactively addressing problem gambling.

The Casino’s goal is to create an effective, sustainable, measurable, socially responsible and accountable approach to gaming. The Casino’s objective will be to minimize the effects of gambling harm on individuals, families, and the community by promoting best practices in responsible gaming by utilizing emerging technologies.

It is the policy of the Casino to comply fully with all aspects of this program to mitigate pathological and problem gaming, ensure gambling is conducted in a fair and open way, prevent underage gambling and unattended minors in the Casino, and to serve alcoholic beverages and advertise responsibly.

## **II. RESEARCH & RESPONSIBILITY**

The Casino works to support responsible gaming research and a commitment to social responsibility. Social responsibility, sustainability, and guest protection are central to public confidence and therefore is a core business approach driven from senior leadership. The commitment contributes to the evolution of the Casino’s responsible gaming features, internal controls and program, team member training, and overall understanding of player behavior as part of its research and responsibility.

Problem gambling can cause disruption in many areas of life: psychological, social (relationships with family and friends), financial, and vocational (school and work). Based on a clinical assessment, an individual may be diagnosed with a gambling disorder, or may be found to be ‘at-risk’ for problem gambling. As with all addictions, problem gambling is a complex issue that usually requires clinical treatment to experience recovery. Individuals with problem gambling issues are also at a higher risk for co-occurring disorders (substance use and/or mental health) and suicide than the general public. However, recovery is possible when individuals work with trained problem gambling counselors using evidence-based treatments.

The impact in Washington State according to the Problem Gambling Task Force (“PGTF”) as of January 2020, estimate that 2.7% of Washington adults could be classified as at-risk gamblers, 0.7% as problem gamblers, and 0.5% as likely to be diagnosed with a gambling disorder, for a total estimated prevalence rate of 3.9%.

The PGTF is a joint legislative work group funded by the Washington State Legislature in 2019. They were created to review existing outreach, prevention, and treatment resources for problem and disordered gambling.

The Casino shall review the Problem Gambling Task Force Final Reports for any future amendments to the Casino Responsible Gaming Program.

Additionally, the Casino is committed to focused research on responsible gaming that includes initiatives of governments, operators, local councils, and advocacy groups supporting problem gambling awareness and to develop best practices. Muckleshoot shall follow or collaborate with important problem gambling advocacy groups such as the American Gaming Association, National Council on Problem Gambling, National Center for Responsible Gaming, the PGTF, national and tribal gaming regulators, and more.

### **III. PROGRAM INFORMATION & ADVERTISING**

The Casino shall adopt property signage and responsible gaming disclosures. The signage and resources are designed to foster responsible gaming and identifying the risks of problem gambling, as well as disclosing toll-free phone numbers and other resources for counseling and assistance.

The informational materials shall be made available at conspicuous locations throughout the casino, including all ATMs or cash dispensing kiosks, in or near gaming and cage areas, Sports Wagering Kiosks, etc. in the gaming facility.

Specific resources shall be available 24 hours a day. Anyone who may have a problem with gambling can call or text Evergreen Council on Problem Gambling (ECPG) at 1-800-547-6133. ECPG is a private, not-for-profit organization offering programs and services for problem and compulsive gambling in Washington and throughout the Pacific Northwest. The service provides free, confidential information and referral. ECPG can also be visited at [www.evergreencpg.org](http://www.evergreencpg.org). A copy of ECPG informational materials is part of the available informational materials available at conspicuous locations throughout the casino.

Gambling advertisements shall not target minors. Other advertisements should include information about responsible gambling and identify resources for individuals seeking information about problem gambling (e.g., national or local hotline numbers, etc.).

Moreover, each application for Mobile Sports Wagering application, if offered, shall include the option to self-impose limitations for wagering parameters, including the following:

- Limits on the dollar amount of deposits a player can make into his/her Player Account within a specified time period;
- Limits on the total amount of time available for play or wagering during a specified time period.

The Casino shall provide information on the Casino website, Informational Kiosk, brochures or other awareness signage describing responsible gaming, their policies and practices related to responsible gaming and where to find assistance.

Casino gambling advertising and marketing shall contain the following at a minimum:

- Contain a responsible gaming message and/or toll-free help line number where practical.
- Reflect generally accepted contemporary standards of good taste.
- Strictly comply with all applicable standards to make no false or misleading claims.

Casino gambling advertising and marketing will not:

- Contain images, symbols, celebrity/entertainer endorsements and/or language designed to appeal specifically to children and minors.
- Feature anyone who is or appears to be below the legal age to participate in gambling activity.
- Contain claims or representations that gambling activity will guarantee an individual's social, financial or personal success.
- Be placed before any audience where most of the audience is ordinarily expected to be below the legal age to participate in a gambling activity.
- Imply or suggest any illegal activity of any kind.

Casino informational materials shall include questions that guests shall review to determine if they have a problem gambling issue. The questions shall include the following 20 (most compulsive gamblers will answer yes to at least seven of these questions):

- Did you ever lose time from work or school due to gambling?
  - Has gambling ever made your home life unhappy?
  - Did gambling affect your reputation?
  - Have you ever felt remorse after gambling?
  - Did you ever gamble to get money with which to pay debts or otherwise solve financial difficulties?
  - Did gambling cause a decrease in your ambition or efficiency?
  - After losing did you feel you must return as soon as possible and win back your losses?
  - After a win did you have a strong urge to return and win more?
  - Did you often gamble until your last dollar was gone?
  - Did you ever borrow to finance your gambling?
  - Have you ever sold anything to finance gambling?
  - Were you reluctant to use "gambling money" for normal expenditures?
  - Did gambling make you careless of the welfare of yourself or your family?
-

- Did you ever gamble longer than you had planned?
- Have you ever gambled to escape worry or trouble?
- Have you ever committed, or considered committing, an illegal act to finance gambling?
- Did gambling cause you to have difficulty in sleeping?
- Do arguments, disappointments or frustrations create within you an urge to gamble?
- Did you ever have an urge to celebrate any good fortune by a few hours of gambling?
- Have you ever considered self-destruction or suicide as a result of your gambling?

#### **IV. SELF BAR/EXCLUSION PROGRAM**

The Casino is committed to assisting customers in need by making responsible gaming an integral part of our daily operations. Guests may ask for assistance, show emotional distress, or show other symptoms of fatigue. Responsible Gaming brochures will be displayed at the Cage, Muckleshoot Rewards, and Sports Wagering Kiosks. Team Members should provide the guest a brochure upon request or contact their Supervisor if a guest asks for assistance.

The Casino shall offer a self-bar/exclusion service for all Casino visitors. Under this program, Casino guests may exclude themselves from the Casino by completing a Self-Barring Notice at the Security podiums at the doors or other designated area.

By self-barring/excluding themselves from the Casino, the guest agrees to be removed from all privileges of casino guests (e.g., personal check cashing, credit card cash advances, etc.), participating in any and all marketing promotions offered, and all marketing materials or advertisements received by any means are to be disregarded.

No further points, rewards, or benefits may be accumulated or redeemed from the player recognition programs in which the guest has participated from and will be forfeited.

Self-bar/excluded guests who place unpermitted wagers will not be entitled to be paid any winnings or prizes, nor recover any unpermitted wagers, nor entitled to any relief whatsoever. The barrings are permanent and does not expire unless approved in writing by the Muckleshoot Gaming Commission. Guests who enter property before being reinstated by the Muckleshoot Gaming Commission, may be subject to arrest and prosecution for criminal trespass under applicable laws.

Security shall provide a daily list to Marketing of all self-barred/excluded guests. Guests who have been self-barred/excluded shall be marked in CMP as excluded by Marketing. Mailing lists, e-mail lists, and phone lists should be scrubbed of self-barred/excluded guests before mailing or phoning.

Team Members should check the CMP system for a self-barred/excluded guest before completing any of the following:

- Any jackpot;
- Personal Check cashing or debit card, credit card advance;
- Casino Credit;
- Issuing a player card;
- Issuing a player comp;
- Entering a player rating; and
- Any time an ID/TIN is presented when the guest exceeds the CTR reporting threshold.

#### V. **PREVENTING UNDERAGE GAMBLING AND UNATTENDED MINORS IN THE CASINO**

Casino will make a diligent effort to prevent underage individuals from participating in any gambling at the Casino and loitering in the gaming area of the Casino.

Signs shall be conspicuously posted at all public entrances prohibiting underage individuals from entering the restricted areas. Adults will be required to accompany minors in allowed areas.

The Casino shall communicate the legal age to gamble through messaging, on the Casino website, social media, and other gambling promotions.

Casino staff maintains a commitment to enforce the company-wide “Under 35 Challenge” which states that any person who appears under 35 years old must present valid picture identification prior to entering the building. All entrances shall be equipped with an Identification Scanner. If a guest claims to be over the legal age but is unable to provide a valid ID upon claiming a wager, Casino staff shall ask the guest to leave and return with ID so payment/credit can be made.

For the purpose of validating age, the acceptable type of valid picture identification includes the following:

- State Driver’s License;
- State Issued Identification;
- Military Identification (must not be scanned into the system);
- Passport;
- Valid Tribal Enrollment Identification.

If a child appears to be unsupervised or in violation of local curfews and other laws, Security shall be contacted, and reasonable steps shall be made to locate the parent or responsible adult on property or by telephone.

#### VI. **SERVING BEVERAGE RESPONSIBLY**

Alcohol has a disinhibiting effect on gambling behavior. Therefore, the Casino is committed to providing guests a responsible beverage service program that includes the following elements:

---

- Not knowingly serve alcoholic beverages to a minor.
- Not knowingly serve alcoholic beverages to a visibly intoxicated person.
- Make a diligent effort not to permit casino gambling by a visibly intoxicated person.

When a Team Member notices a guest may be intoxicated, the following steps must be followed:

- Notify a Food & Beverage Supervisor/Manager, Table Games Shift Manager or Security Team Member.
- The Table Games Shift Manager or Security Team Member shall assess whether guest is intoxicated.
- Guests assessed as intoxicated will have their alcohol service cut-off. If the guest violates the cut-off, the guest will be issued a 24-hour Guest Gaming Suspension.

## **VII. TEAM MEMBER RESPONSIBLE GAMING TRAINING PROGRAM & AWARENESS**

The Casino provides a training program for all employees. The training shall, at a minimum, consist of information concerning the nature and symptoms of problem gambling behavior and assisting guests in obtaining information about problem gambling programs. Additionally, the training shall consist of covering underage gambling and unattended minors, and alcoholic beverage restrictions for visibly intoxicated persons.

The training will include the following elements:

- The signs and symptoms of a gambling problem;
- The effects of a gambling problem on individuals and their families;
- A description of the responsible gaming program offered;
- How to enroll or contact a hotline for assistance;
- How to handle if someone asks the employee for help;
- What to do if an employee suspects a guest has a gambling problem but does not overtly ask for help;
- Which individuals or departments should potential problem gamblers be referred to.

Specific commitments to training shall include the following:

- Provide ongoing education to Team Members about responsible gaming and their role in promoting a responsible gaming environment.
- Reduce the risk of guests and Team Member gambling-related problems through training, policies and procedures, and best practices.
- Provide Team Members clear statements of expectations and responsibilities, including an emphasis on the importance of employees in promoting responsible gaming and creating a healthy gambling environment.

The Casino shall post responsible gaming awareness information, including a toll-free help line number, at various locations where employees congregate (e.g., Team Member Dining Room, Break Rooms, etc.). Team Members shall be trained where to find this information and how to assist guests seeking guidance.

---

All Casino Team Members shall be informed of the responsible gaming policy and commitment as part of their initial Team Member orientation.

Team Members can contact the Employee Assistant Program (EAP) for counseling regarding problem gambling or other addictive disorders.

Training shall be offered at new hire orientation and at least annually thereafter. The Director of Compliance, or designee, shall facilitate the training as part of the annual Compliance/Title 31 training.

#### **VIII. RESPONSIBLE GAMING COMMITTEE**

Muckleshoot Casino Resort has established a Responsible Gaming Committee comprising of the following leadership positions:

- Chief Executive Officer;
- General Manager;
- Chief Financial Officer;
- Executive Director of Human Resources and/or Director of Human Resources;
- Executive Director of Support Operations and/or Director of Support Operations;
- Executive Director of Gaming Operations and/or Director of Gaming Operations;
- Executive Director of Food & Beverage and/or Director of Food & Beverage;
- Director of Compliance;
- Chief Marketing Officer and/or Director of Marketing;
- TGA Representative.

The Committee shall meet at least annually to assess the program, assess compliance to practices and policies described in the Responsible Gaming Program, and to prepare a report of any findings to the Gaming Advisory Board and Muckleshoot Gaming Commission. The Director of Compliance shall facilitate the meeting and provide the Committee information of the program effectiveness and recommendations for improvements.