

**ANNEX C**

**APPLICATION FOR PROVISIONAL STATEMENT BY APOLLO RESORTS AND  
LEISURE LIMITED**



**Application for a provisional statement under the Gambling Act 2005 (standard form)**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is in respect of a vessel the application should be made on the relevant form for that type of premises.

**Part 1 – Type of premises to which the application relates**

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

**Part 2 – Applicant Details**

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

**Section A**

**Individual applicant**

1. Title: Mr  Mrs  Miss  Ms  Dr  Other (please specify)

2. Surname:

Other name(s):

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]*

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

*[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

## Section B

### Application on behalf of an organisation

6. Name of applicant business or organisation: APOLLO RESORTS AND LEISURE LTD.

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]*

7. The applicant's registered or principal address:

APOLLO RESORTS AND LEISURE LTD.  
24 ADAM & EVE MEWS  
LONDON

Postcode: W8 6UJ

8(a) The number of the applicant's operating licence (as given in the operating licence): N/A

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: 24/05/2010

9. Tick the box if the application is being made by more than one organisation.

*[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

## Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): Not known at present

11. Address of the premises (or, if none, give a description of the premises or proposed premises and their location):

The Small Casino will be sited in a seven storey development (including a lower ground floor) at the following address: Cattlemarket site, Walcot Street, Bath. BA1 5BD.

This is bordered by Walcot Street to the West, the River Avon to the East and the Hilton Hotel to the South. The Cattlemarket site is owned by BANES Council.

The casino has a principal entrance from Walcot Street at ground floor level.

The casino is based on the first floor of the seven storey building. The only access to the casino at first floor level is via the principal entrance. Also at the lower ground and ground floor levels, in separate units, will be commercial uses (that may include bars, restaurants, retail).

The entrance to the hotel is at ground floor level with the accommodation sited on floors 2, 3, 4 & 5.

Postcode: BA1 5BD

12. Telephone number at premises (if known): Not known at present

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

Answer to 13. is provided in a separate sheet at the end of this form. (\*)

14(a) Are the premises or proposed premises situated in more than one licensing authority area?  
Yes/No *[delete as appropriate]*

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises or proposed premises are partly located, other than the licensing authority to which this application is made: N/A

#### Part 4 – Times of Operation

15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? Yes/No *[delete as appropriate]*  
*[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

15(b) If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	00:00 <i>hh:mm</i>	24:00 <i>hh:mm</i>	N/A
Tue	00:00	24:00	
Wed	00:00	24:00	
Thurs	00:00	24:00	
Fri	00:00	24:00	
Sat	00:00	24:00	
Sun	00:00	24:00	

16. If you want the premises licence to have a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: N/A

**Part 5 – Miscellaneous**

17(a) Does the application relate to premises or proposed premises which are part of a track or other sporting venue which already has a premises licence: *Yes/No [delete as appropriate]*

17(b) If the answer to question 17(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application:

18(a) Do you hold any other premises licences that have been issued by this licensing authority?  
*Yes/No [delete as appropriate]*

18(b) If the answer to question 18(a) is yes, please provide full details:

19. Please set out any other matters which you consider to be relevant to your application:

We have included a sample of our Policies:

1. Crime and Disorder Policy
2. Social Responsibility and other policies.

These are attached separately at the end of this form.

**Part 6 – Declarations and Checklist (Please tick)**

# We confirm that, to the best of my/ our knowledge, the information contained in this application is true. # We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

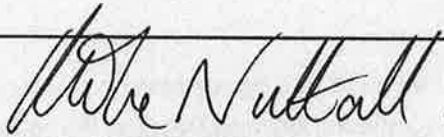
Checklist:

- Payment of the appropriate fee has been made/~~is enclosed~~
- A plan of the premises or proposed premises is enclosed
- ~~#~~we understand that if the above requirements are not complied with the application may be rejected
- ~~#~~we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

**Part 7 – Signatures**

20. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature of Applicant:



Print Name: MR MICHAEL EDWARD NUTTALL

Date: (28/02/2011) Capacity: MANAGING DIRECTOR

21. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

*[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 20 and 21.]*

*[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]*

**Part 8 – Contact Details**

22(a) Please give the name of a person who can be contacted about the application:

MR MIKE NUTTALL

22(b) Please give one or more telephone numbers at which the person identified in question 22(a) can be contacted:

T: 020 7937 1773

23. Postal address for correspondence associated with this application:

APOLLO RESORTS AND LEISURE LTD.  
24 ADAM AND EVE MEWS  
LONDON

Postcode: W8 6UJ

24. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

**mn@apolloresorts.com**

\*

**Answer No. 13**

**The Small Casino will be sited in a seven storey mixed use (leisure, entertainment, hotel, commercial development (including a lower ground floor) at the following address:**

**Cattlemarket site, Walcot Street, Bath. BA1 5BD.**

**This is bordered by Walcot Street to the West, the River Avon to the East and the Hilton Hotel to the South. The Cattlemarket site is owned by BANES Council.**

**The casino has a principal entrance from Walcot Street at ground floor level. The casino is based on the first floor of the seven storey building. The only access to the casino at first floor level is via the principal entrance.**

**Also at the lower ground and ground floor levels, in separate units, will be commercial uses (that may include bars, restaurants, retail). The entrance to the hotel is at ground floor level with the accommodation sited on floors 2, 3, 4 and 5.**

**-X-**



# BATH CASINO



**APOLLO**  
RESORTS & LEISURE LTD

**RTKL**

28th Feb 2011





Proposed Casino Location



Proposed Site Location

**GENERAL NOTES**

All dimensions are in meters unless otherwise stated.  
 All dimensions are to the centerline of the building unless otherwise stated.  
 All dimensions are to the centerline of the building unless otherwise stated.  
 All dimensions are to the centerline of the building unless otherwise stated.

Site Plan

**TOTAL AREAS FOR PREMISES TO BE LICENCED**

TABLE GAMING: 754 sqm  
 NON-GAMBLING: 821 sqm  
 OTHER GAMBLING: 441 sqm  
 BOH: 435 sqm  
**TOTAL: 2451 sqm**

- TABLE GAMING AREA
- OTHER GAMBLING (getting machines tested)
- NON-GAMBLING AREA
- BOH (back of house)
- Development (to be done)
- CIRCULATION

- Defined building perimeter of development
- Efficient of premises to be licensed
- Streets Light

The Principal Entrance is located off Vahed Street. Bath BOH Adjacent to the proposed hotel entrance.

**BATH CASINO**  
 APOLLO RESORTS & LEISURE LTD



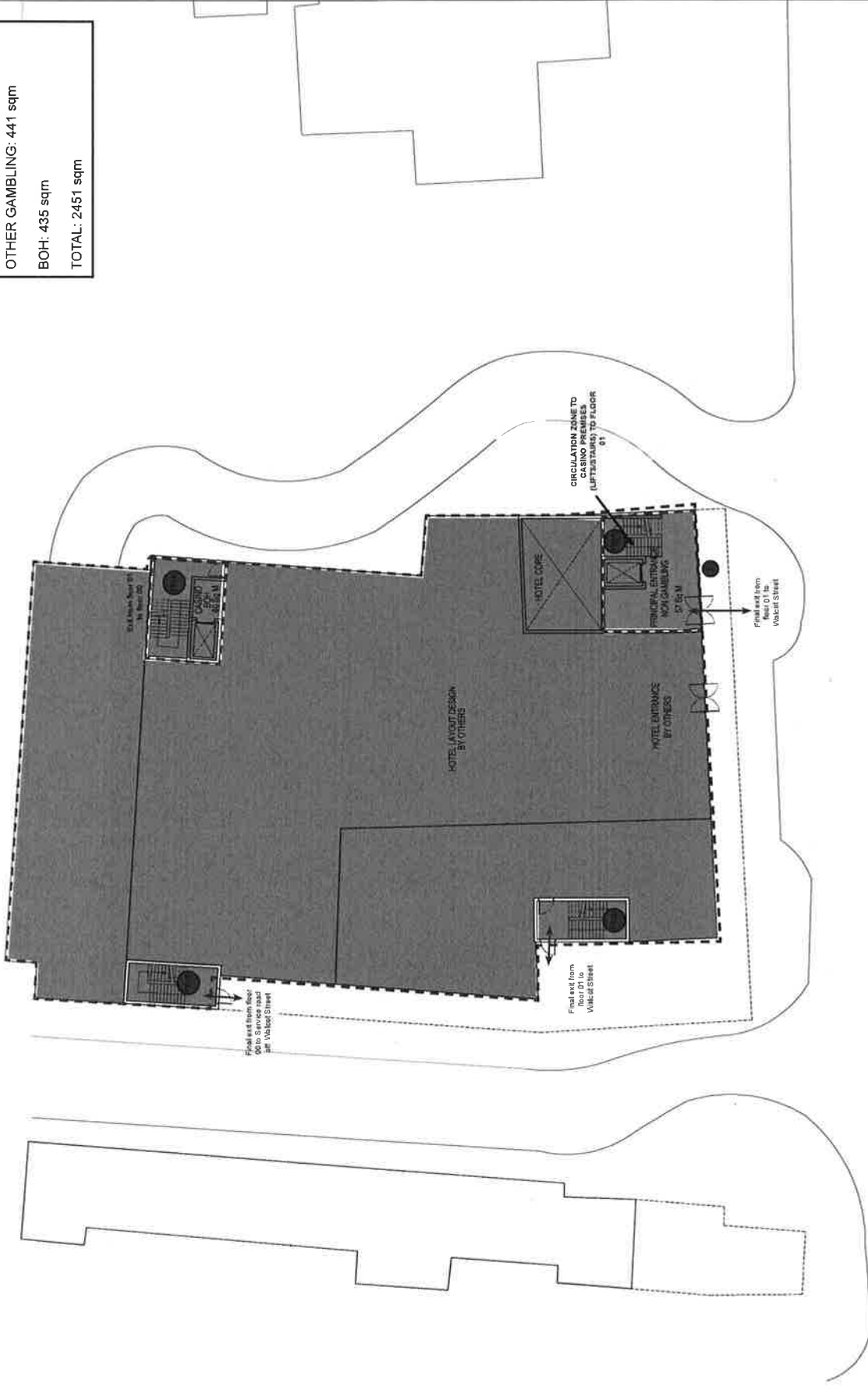
RTKL GROUP  
 11th Floor, 111, Market Street, Singapore 048947  
 Tel: +65 6500 7000  
 Fax: +65 6500 7001  
 www.rttl.com

**CASINO ENTRANCE LEVEL 00**

**PRELIMINARY**

Scale: 1:500

Sheet: A-01



**GENERAL NOTES**

All dimensions are in meters unless otherwise stated. All dimensions are to the center line of walls, columns, and other structural elements unless otherwise stated. All dimensions are to the center line of walls, columns, and other structural elements unless otherwise stated. All dimensions are to the center line of walls, columns, and other structural elements unless otherwise stated.

- TABLE GAMING AREA
- OTHER GAMING (pools, bars, etc.)
- NON-GAMING AREA
- BOH (back of house)
- Depositions (B.A. diffusers)
- CIRCULATION
- Defined building perimeter of development
- Extent of premises to be developed
- System Line

**PROJECT**

**BATH CASINO**

**CLIENT**

APOLLO RESORTS & LEISURE LTD



**CASINO FLOOR LEVEL 01**

**PRELIMINARY**

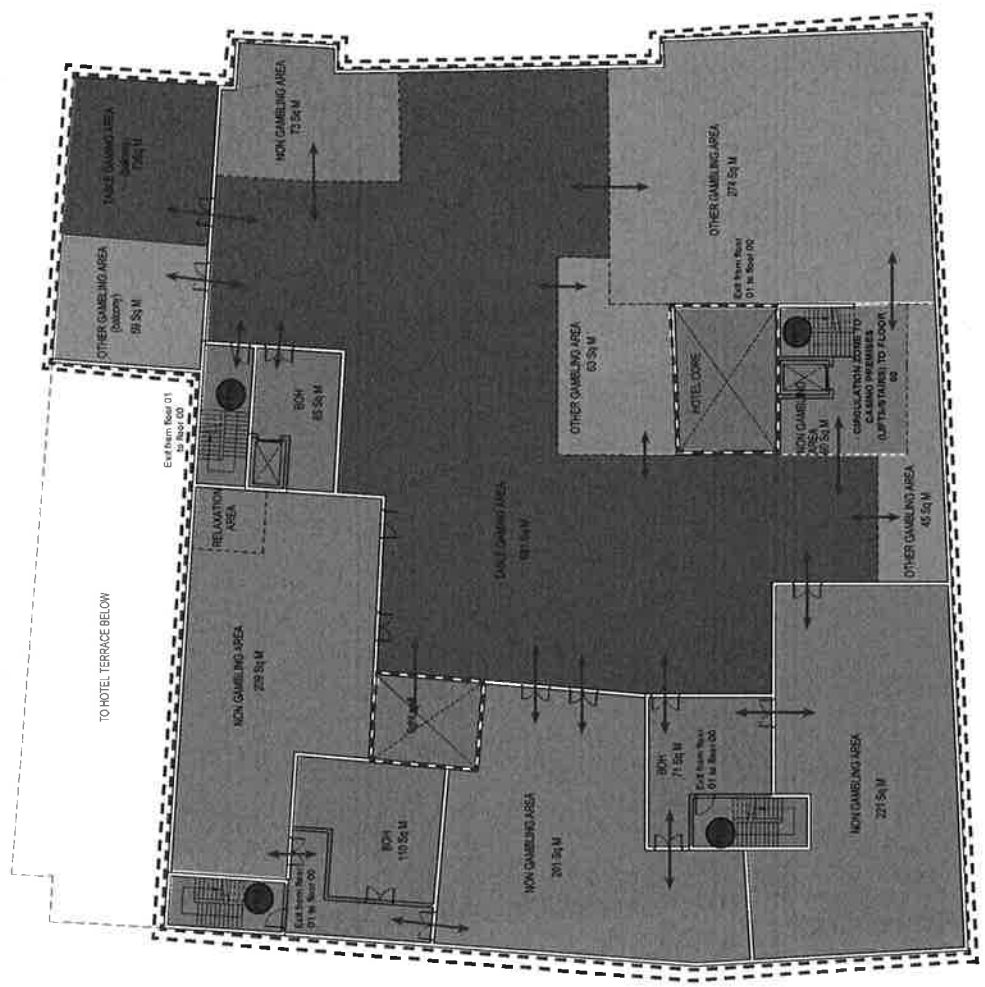
DATE: 10/10/2011

PROJECT: BATH CASINO

CLIENT: APOLLO RESORTS & LEISURE LTD

SCALE: 1:500

NO: 02



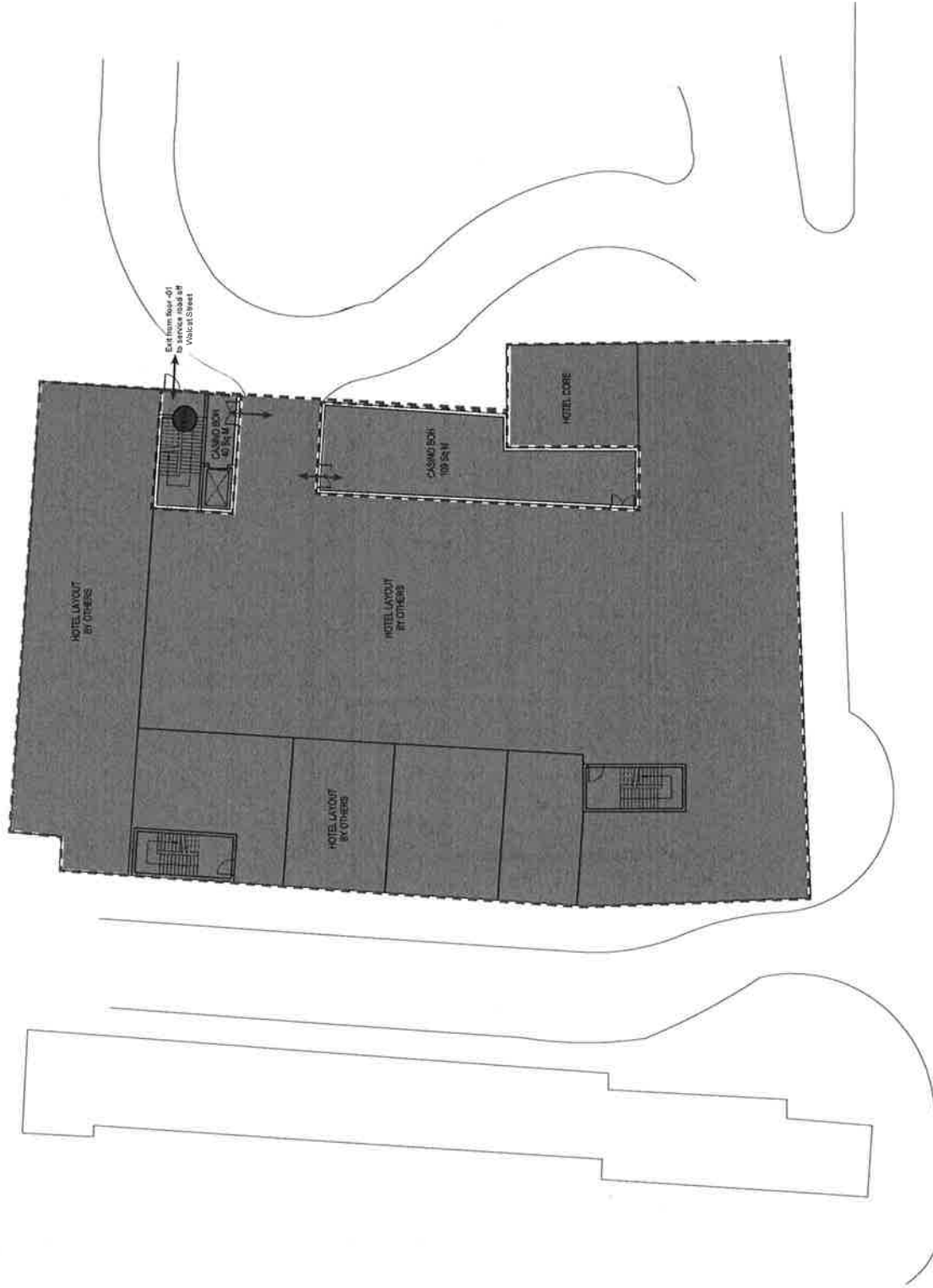
**GENERAL NOTES**

All areas are shown in grey. Areas in white are to be developed. Areas in white with a dashed border are to be developed. Areas in white with a solid border are to be developed. Areas in white with a dotted border are to be developed.

Note: All areas are shown in grey. Areas in white are to be developed. Areas in white with a dashed border are to be developed. Areas in white with a solid border are to be developed. Areas in white with a dotted border are to be developed.

Do not scale from this drawing.

- TABLE GAMING AREA
- OTHER GAMING (gaming machines, betting)
- NON-GAMING AREA
- SCM (back of house)
- Development (by align)
- CIRCULATION
- Defined building perimeter of development
- Extent of perimeter to be developed
- Setback Line



REV. DATE. DESCRIPTION

PROJECT

**BATH CASINO**

CLIENT

APOLLO RESORTS & LEISURE LTD



RTKL Ltd  
 27 Colindale Avenue  
 Colindale, London NW9 1NS  
 Tel: +44 (0)20 7730 0100  
 Fax: +44 (0)20 7730 0100  
 www.rtkl.com

PROJECT NAME

**CASINO LEVEL -01**

DATE

**PRELIMINARY**

DATE	DESCRIPTION
03	03





## **Crime and Disorder policy**

Apollo Resorts and Leisure Ltd (ARL) has an exemplary track record of delivering unique and exciting leisure and entertainment activities in all of their projects within a safe, secure and compliant environment. ARL and its employees will strive to meet the Gambling Act 2005 licensing objectives at all times:

- (a) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime**
- (b) Ensuring that gambling is conducted in a fair and open way, and**
- (c) Protecting children and other vulnerable persons from being harmed or exploited by gambling**

ARL will comply with all Codes of Practice issued by the relevant regulatory bodies and Local Authority.

The Directors and retained advisors of ARL have a long and established history in the Gaming industry with an exemplary track record.

### **Objectives**

The continued safety of customers, colleagues and contractors is paramount at all times and we will create and maintain a safe and secure environment free of crime and disorder by preventing:

- Money Laundering
- Cheating
- Credit betting
- Illegal gambling
- Under 18's entering the premises
- Antisocial behaviour
- Use of drugs
- Substance misuse
- Alcohol misuse
- Violence
- Assault with a deadly weapon (i.e. gun or knife)
- Robbery
- Vandalism
- Abandoned cars
- Large groups

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



- Graffiti
- Pickpockets
- Prostitution

## Strategy

- a. The Objectives stated above are not exhaustive, but by consulting and working in partnership with the relevant Police Authority, Transport Police, local Crime Prevention Groups, key local stakeholders and Crimestoppers we will work collectively to improve, promote and deliver our prevention of crime and disorder policy. Particular attention will be paid to the local sensitivities and trends
- b. Compliance with all relevant Gambling Commission requirements, including PML's and PFL's and sharing best practice wherever possible
- c. Consult and communicate with the local community at all times
- d. Regular evaluation and review of the policy
- e. During the build of the premises particular attention will be paid to "designing out crime" including external and internal lighting; street furniture; entrances and exits
- f. CCTV to cover all potential high risk areas including entry and exit points, perimeter areas, gaming locations and cash desk etc
- g. Door Supervisors, and high level security awareness and reaction training being continually monitored and updated
- h. Operational procedure manuals to include social responsibility, security, anti money laundering, gaming, cash handling and reception policies

## Implementation of strategy

- a. Door Supervisors to be qualified to Level 2 for Door Supervision in the National Qualification Framework (NQF) or equivalent
- b. All employees to undertake an ongoing training programme, continually monitored and evaluated with particular focus on the three Licensing Objectives

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800





- c. CCTV to be operational on a 24 hour continuous basis; maintained to the highest standard with the operators holding a PML and recordings held as per the legal requirements
- d. Employees will have a responsibility to report all suspicious incidents, dishonesty and suspected contraventions of security, legislation or procedures to Management at all times
- e. All incidents that the door supervisors deal with will be recorded. The record will include the supervisor's name, the time they commenced and finished duty. These records will be kept and maintained by security
- f. Illegal drugs. Knowing what signs or symptoms to look for will help Security and Door Supervisors in detecting the use of drugs with full training provided
- g. Money Laundering approach is covered in detail below

## **PREVENTION OF MONEY LAUNDERING**

### **Policy Statement**

The Directors of ARL take seriously their responsibilities to ensure that Anti Money Laundering legislation is complied with. The Directors will ensure that all employees of ARL, with their individual obligations in respect of anti-money laundering, will take seriously the robust measures that will be put in place. The objective of these robust measures is to ensure that any efforts to launder the proceeds of criminal activity through the company's operations are prevented.

Procedures will be in place to deal with any suspicion of money laundering, so that it can be dealt with appropriately and within the associated legislation.

The company recognises the penalties for failure to comply with Anti Money Laundering legislation that could affect the ability of the company to operate in the future. The company will regularly assess the adequacy of their systems and controls.

In order to ensure that the company and its employees are not in breach of Anti Money Laundering legislation the company will:

- Appoint a designated Money Laundering Reporting Officer (MLRO) and Deputy MLRO
- Deliver staff training at all levels to include identification of suspicious gaming transactions, activity or incidents and the correct reporting process

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

3



- Audit process that measures compliance with Anti-Money Laundering legislation and procedures identifying points of difficulty or uncertainty
- Provide a source of communication for all enquiries or questions regarding this Policy and a reporting process that directs information to the MLRO
- Make Suspicious Activity Reports (SARs) in accordance with Anti Money Laundering legislation and Serious Organised Crime Agency (SOCA) guidelines
- Cooperate fully with the Gambling Commission (GC), Police, Serious Organised Crime Agency (SOCA) and Local Authority Licensing Departments and instruct Management to do this at all times
  
- Consider any action by an employee that is in breach of company instruction or policy in relation to Anti Money Laundering as an action which may lead to summary dismissal

It will be the responsibility of every member of staff to report any suspicions regarding potential money laundering to the MLRO, or in his absence to the PML holder on duty. All reports are dealt with in the strictest confidence and handled by the MLRO.

The company will produce a policy and procedure manual on Anti Money Laundering that will include:

- Training of Management, Receptionists, Cashiers and Gaming Staff
- Ongoing training
- Nominated Officer (Money Laundering Reporting Officer)
- Management and Departmental Responsibilities
- Customer due diligence
- Record-keeping
- Audit
- Financial Transactions
- Reporting of Suspicious Activity
- Retention of Records
- Breaches of Regulations
- No "Tipping Off" allowed

**PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING**



# APOLLO

RESORTS & LEISURE LTD

- Full compliance with Gambling Commission Guidance to Casinos for the Prevention of Money Laundering and Combating the Financing of Terrorism
- Full compliance with The Money Laundering Regulations 2007 (the Regulations)
- Money Laundering Offences
- Money Laundering Staff Training Record (New employees)
- Money Laundering On-Going Staff Training Record
- Cash Transaction Record
- Suspicious Activity Report (Internal)

The company will produce and upkeep the required Security procedure manual that will include detailed policies and support on:

- Fraternisation and Socialising with customers
- Security of the Premises (Lockdown procedures etc)
- Security of the Count
- Intruder Alarm systems
- Key Security
- Cash/Chip Security
- Cash Desk key security
- Security of Gaming Equipment
- Security of Non Gaming goods
- Lost and found property
- Close Circuit Television Systems (Cash Desk, Gaming, Count room, and Entrances)
- Personal Safety (Dealing with confrontations and violence)
- Fire Precautions
- Identifying the use or influence of illegal drugs
- Disaster responses (Gas leaks, Power cut, Flooding and Fire)
- Reporting incidents

## **Counterfeit money protection**

In cases where large amounts of cash are tendered either at the cash desk or on the tables it will be put through a note counting machine with counterfeit detection. Should they prove to be counterfeit the police will be immediately informed. A note counter with counterfeit detection will also be used on the count.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



**APOLLO**

RESORTS & LEISURE LTD

## **MONEY LENDING BETWEEN CUSTOMERS**

### **1) Objective**

The objective of the following procedures is to ensure that any significant money lending taking place within the casino that falls into any of the following headings IS TERMINATED WITHOUT DELAY:

- a) Commercial (Profitable, money-making)
- b) Organised (Prearranged, planned)
- c) Systematic (Orderly, regular)
- d) Involves Money Laundering

### **2) Suspicion of money lending**

If any member of staff suspect significant money lending transactions between customers may be taking place within the casino they must immediately inform management.

### **3) Enquiries**

Management will make enquiries to determine whether there is any money lending taking place. If there is evidence that shows significant money lending

is taking place within the casino, management must initiate an investigation with the assistance of security.

### **4) Investigation and required action to be taken**

The investigation must consider whether the findings fall within the following headings and take the appropriate action as described below.

- a) **No evidence of money lending taking place.**  
(No further action required)
- b) **Trivial amounts (Small, unimportant)**  
(A Security Investigation Report is to be made for future reference. Also management to take note and monitor the customer(s) to ensure there is no escalation in amounts)
- c) **Transient (Temporary, brief)**  
(In a case where a customer may for example have given their friend/relative some cash chips to complete their bet for that spin while they are awaiting the encashment of a cheque etc. In this type of case no further action is required)

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 www.apolloresorts.com

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



# APOLLO

RESORTS & LEISURE LTD

- d) **Playing together.** (Where maybe husband and wife play from the same bankroll)  
(Should it be discovered that say two people are playing from the same bankroll and management are satisfied that this is genuine no further action is required as long as they are keeping within the stated maximums.)
- e) **Significant (Major, noteworthy)**

All **significant** money lending transactions which fall into the headings below must take the appropriate action as stated:

i) **Commercial (Profitable, money-making)**

If the evidence suggests any person has become involved in commercial money lending they must be excluded either temporarily or permanently from the casino.

ii) **Organised (Prearranged, planned)**

If the evidence suggests any person has become involved in organised money lending they must be excluded either temporarily or permanently from the casino.

iii) **Systematic (Orderly, regular)**

If the evidence suggests any person has become

involved in systematic money lending they must be excluded either temporarily or permanently from the casino.

iv) **Money Laundering**

If the evidence suggests any person has become involved in money lending that may involve money laundering a suspicious transaction report must be completed and sent to the Money Laundering Reporting Officer (MLRO) and they must be excluded either temporarily or permanently from the casino.

(In all cases where the operator encounters systematic or organised money lending, a report should be made to the Commission.)

## Close Circuit Television Systems (CCTV)

### Introduction

The Casino has CCTV fitted in various parts of the premises, some of which involve very sophisticated systems. It is therefore very important that the equipment is properly operated and maintained in order to get the full benefit from it.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 www.apolloresorts.com

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD, Registered No: 5984800



CCTV is installed as an aid to management in all aspects of the business. It provides additional safeguards when monitoring gaming and is an asset in the general security of the premises.

However, the equipment is only as good as the way it is operated. By following these procedures, and ensuring that all relevant personnel are fully familiar with the equipment, the maximum use and return can be gained from the CCTV system.

### **General**

Only Security Management are authorised to specify the CCTV equipment and layout of the system. This will be done after consultation with the local Management. It follows that no alteration may then be made to the system without the knowledge and agreement of the Security Manager. No fixed cameras are therefore to be moved, or their angles altered, without prior authorisation.

### **Reception Coverage**

The Reception camera should be operational twenty four hours a day and provide a clear view of persons approaching the Reception desk from outside the building. Audio is provided as an additional aid in the event of incidents.

### **Gaming Coverage**

Cameras covering the gaming area can either be fixed or fitted with a pan, tilt and zoom motor. Fixed cameras are allocated to a particular table or machine and are pre-set at the time of installation.

Those cameras fitted with a pan, tilt and zoom motor can be used to cover a wide area or moved between tables via the control keyboard.

All camera positions should be must be checked to see they cover the most vulnerable areas.

On card tables, (Blackjack, CSP, Punto Banco, and Three Card Poker) they should be used to record to check and spread of cards. This will help to verify that all cards were present.

Likewise, they should be used to record the spread to confirm that all cards are still present at end of use.

Where there is reflection from the cards, this can be overcome by stepping down the iris of the lens using the control keyboard. If necessary, Security Management will advise on how this can be achieved.

Cameras fitted with pan, tilt and zoom motors should always be trained on the most vulnerable areas or tables. If there is no game on a particular table, the camera should be positioned to perhaps give an overall view of the gaming area, bar, gaming machines or exit doors, for example.

When recording Roulette tables, it is necessary for the camera to cover the whole layout and at least a quarter of the roulette wheel, to safeguard against cheating.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



For card games, the camera should provide an overhead view of the layout covering each of the boxes, the discard holder and the dealing shoe, as the ideal position.

### **Cash desk coverage**

The Cash Desk camera, together with audio, should be situated above the counter to provide a recording of all transactions that take place, including cash payouts and cheques cashed.

Where possible, additional cameras should be located to give an overall view of the Cash Desk and the safe.

### **Count Room Coverage**

Where a Count Room is provided, there should be at least one camera, preferably with audio, covering the count table. This needs to provide full cover of the table-top, to show the processing of each box and the cash emptied and counted from it.

Where there is a Day Count, a rover camera is fitted to cover the drop boxes during the storage period between the close of business and the next day count.

### **External Camera Coverage**

External cameras are used to view the approach to the premises, and staff entrance. These cameras are linked to the system in the CCTV office, from where incidents or problems can be observed.

These cameras are linked to the camera room from where entrance to the building can be controlled.

**Note:** Any faults to this equipment **MUST** be reported to the relevant CCTV supplier as soon as they are discovered.

At the end of the cash count, the cameras should be left recording the most vulnerable areas of the gaming room such as machines or the pit area to give cover for any possible incident.

### **Required paperwork for CCTV**

The following books are required to be kept alongside the CCTV control panel/desk:-

- i) **A Fault Book.** This will be used to record any items of equipment that require repair. All faults should be recorded, detailing the problem; the date that it was reported to the Maintenance Company and any comments by the engineer at the time the fault was rectified.
- ii) **An Incident Book.** This should be a Day to a Page Diary, in which ALL occurrences or reviews are recorded. Whenever an incident occurs that necessitates a review, it should be recorded into the Incident Book for that date, along with the outcome. In the event of a disputed bet, details of the

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING



incident should be recorded, together with the result of any review and whether or not the customer was paid out.

#### **Audit check of recordings**

Apart from reviews conducted to replay specific incidents or disputes, it is also necessary for recordings to be reviewed on a regular basis.

A record of all such reviews must be maintained in the Security Register, detailing the dates and recordings reviewed, and any observations found.

As the Count and gaming operations are constantly monitored and observed by CCTV Security, the review of sample recordings will not be required, unless deemed necessary by the Head of Security or Casino Director.

The General Manager must be informed of any breaches of procedure or serious observations found through a recording review or monitoring of CCTV coverage.

Reviews of the gaming operation should be done as a matter of routine. However, in addition, **a table may develop a sudden drop in profit, or suffer a low percentage.** In such cases, the GM or Casino Director may feel it necessary to carry out additional reviews.

#### **Maintenance of CCTV equipment**

As stated earlier, each premise must be supplied with a Fault Book in which to record faults as and when they occur. This will also be used to record the date and time that those faults were then reported to the Service Company. The systems fitted in each of our premises will be covered by an annual maintenance agreement.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800





## **Social Responsibility**

The Directors of Apollo Resorts and Leisure Ltd (ARL) will fulfil their obligations by providing their customers and employees with an effective Social Responsibility Policy.

ARL and its employees are committed to deliver unique and exciting leisure activities within a socially responsible environment by complying with all the requirements of the Licence Conditions and Codes of Practice.

For the majority of people gambling, it is an enjoyable and harmless activity but for a small minority gambling can become a behavioural problem. To address this ARL intend to work closely with Gamcare and seek Gamcare Certification.

The conditions for Gamcare Certification are as follows:

### **Training**

Employees must have received training in social responsibility and problem gambling awareness. Training will be refreshed annually.

### **Assessment**

- Visual Assessment of premises to assess current procedures and safeguards with regards to social responsibility, player protection and LCCP
- Interview with members of staff, gaming and non gaming.

### **Gamcare Certification requirements at Assessment:**

- **Age Verification** - a system to verify age and ID of customers must be in place
- **Self-exclusion** - The ability for a customer to self-exclude must be available
- **Sources of Help** - Leaflets, posters, containing information regarding responsible gambling and sources of help must be displayed and readily available to the customer
- **Awareness** - assessing knowledge and understanding of social responsibility, LCCP and awareness of problem gambling

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



### **Duty of care**

We are responsible to our customers to provide a Duty of Care. To include awareness of the symptoms of problem gambling in our training programmes and promote responsible gambling in our casino operation.

In circumstances where a customer appears not to be in control of their gambling, or where we are provided with reliable information of that fact, we will offer them help and advice.

### **"Enjoy, And Play Responsibly" and Self-Exclusion**

Circumstances where help and advice will be offered

- When a customer approaches us and says that they are no longer in control of their gambling
- When a customer appears not to be in control of their gambling, in particular when a customer appears to be very distressed as a result of their gambling
- When a relative or third party asks for help or information on behalf of someone they feel has a problem with their gambling

In the above circumstances help and advice is offered by responding positively to the situation:

- Informing the customer of the sources of advice and help available, ensuring they have a copy of the "Enjoy, And Play Responsibly" leaflet and are aware of the possibility of self-exclusion
- Advising the relative or third party of help available, including the possibility of self-exclusion, providing them with copies of the "Enjoy, And Play Responsibly" leaflet, and inviting them to return with the customer so that we can offer help and advice direct to the customer

How this works

1. The starting point can be with the customer, a relative or third party, or with both individuals as follows:
  - When a customer approaches us and says that they are no longer in control of their gambling
  - When a customer appears not to be in control of their gambling, in particular when a customer appears to be very distressed as a result of their gambling

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



- When a relative or third party returns to the casino with a customer, having asked for help or information on behalf of the customer
2. In such circumstances responsibility for meeting with the customer, or the relative/third party, or both individuals, is with the Duty Manager. The Duty Manager or duty manager will have received appropriate training so that they are able to act with integrity, support the customer's wishes and provide practical help and advice. There may be situations where the advice and support of the Casino Director is required and the Director may decide to meet the customer with the Casino Manager.
  3. The customer and/or the relative/third party will be informed of the options available, provided with information about and contact details for the GamCare National helpline, provided with copies of the "Enjoy, And Play Responsibly" leaflet and informed about the option of self-exclusion.
  4. If the customer wishes to take up self-exclusion, the Casino Manager or duty manager will explain the procedure, provide the customer with a copy of the self-exclusion leaflet and formalise this with the customer in line with the company's Customer Self-Exclusion Procedure.

In extreme circumstances the Company may decide to refuse service to a person exhibiting severe and repeated indicators of problem gambling that has not taken up the option of self-exclusion. This would only be done in the best interests of the customer concerned and in consultation with the Casino Director.

### **Customer win/loss**

Win/Loss records of customers at a certain level will be kept. This will assist in identifying gamblers gambling beyond their normal limits. If it is considered that this may be the case a player will be spoken to by management and the outcome entered in an interaction report.

### **Availability of help**

Gaming machines and electronic terminals will have stickers on them that state **Gamble Responsibly** with the Gamcare helpline telephone number should they require help.

There will be available a private secluded area for any confidential conversations with players who wish to discuss their possible problem gambling with ARL management.

"Enjoy, And Play Responsibly" leaflets will be available throughout the casino.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



### **Underage Gambling**

Social Responsibility training will be given to all employees and will encompass Underage Gambling and the Vulnerable.

We will have in place measures designed to prevent those underage from entering the casino and gambling.

Signage on entry will clearly show "By law no person under the age of 18 is permitted entry".

Also signage on entry will clearly show a "Think 21 Policy" is in place. Think 21 is a nationally recognised age verification initiative.

Anyone who wishes to enter the premises and appears to be below the age of 21, will be requested to prove their age prior to allowing entry. This also applies to **anyone** who wishes to enter the casino (deliveries, workmen, job interviews, etc)

Entry will be covered by CCTV.

Supervisor(s) will be present on entry.

Supervisors will be qualified to level 2 for Door Supervision in the National Qualification Framework (NQF).

### **Employment of young people**

No person under the age of 18 will be employed.

### **Staff training**

Appropriate training will be given to ensure that all staff understand their responsibilities for preventing underage gambling.

Staff training will:

- Include all employees
- Encourage ownership of our policies and procedures that are designed to minimise harm to our customers
- Raise awareness of the issues, emphasising the importance of taking social responsibility seriously and enable our staff to deal with relevant situations in an appropriate manner
- Inform staff at all levels and give them the skills and confidence to respond appropriately when customers express concern about their gambling or a problem gambling issue arises
- Incorporate social responsibility requirements in induction and on-going staff training

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING



- Involve the appropriate external organisations where necessary to assist in the development of our staff training programmes

Supervisor(s) will ensure implementation of the following age verification check procedures:

- checking the age of customers who appear to be, or are suspected of being, underage
- refusing entry to anyone unable to produce an acceptable form of identification, i.e. one which:
  - contains a photograph from which the individual can be identified
  - states the individual's date of birth
  - is valid
  - is legible and shows no signs of tampering or reproduction
  - acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a driving licence (including provisional licence) with photocard; or a passport
- take action when there are unlawful attempts to enter the premises, including removing anyone who appears to be underage
- Removal of anyone who appears to be underage who has gained access to the gambling facilities and cannot produce an acceptable form of identification

**No facilities or marketing will be deliberately targeted at children or young people.**

**ARL procedures regarding Marketing will comply with LCCP and will follow any relevant industry code of practice on advertising.**

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



**ARL will ensure they follow the CAP and BCAP codes that cover the content and placement of advertising and ensure that gambling advertising is socially responsible. These rules ensure that gambling advertising is not aimed at children or young people and that it does not leave vulnerable people open to exploitation and harm.**

**No person under the age of 18 will be employed at the casino premises.**

### **The Vulnerable**

Employees will be instructed to advise a customer to seek professional advice and then ensure they are excluded from entry to the casino if they are not deemed capable of making an informed decision about gambling, because of mental health problems, learning disabilities or substance misuse relating to alcohol or drugs.

### **Staff training**

Staff training will:

- Include all employees
- Encourage ownership of our policies and procedures that are designed to minimise harm to our customers
- Raise awareness of the issues, emphasising the importance of taking social responsibility seriously and enable our staff to deal with relevant situations in an appropriate manner
- Inform staff at all levels and give them the skills and confidence to respond appropriately when customers express concern about their gambling or a problem gambling issue arises
- Incorporate social responsibility requirements in induction and on-going staff training
- Involve the appropriate external organisations where necessary to assist in the development of our staff training programmes

### **Customers must never be encouraged to:**

- Re-stake their winnings, it is their own decision
- Increase the amount they have decided to commit to gamble
- Chase their losses
- Continue gambling when they have indicated that they wish to stop
- Enter into continuous play on a machine for a prolonged period of time

**PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING**

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



# APOLLO

RESORTS & LEISURE LTD

## Information

Whilst the responsibility for an individuals' gambling is their own we do remind our customers of the need to gamble responsibly and do this through the "Enjoy, And Play Responsibly" material, which:

- Is available in the form of posters and leaflets in the customer area
- Can be obtained without approaching a member of staff
- Includes our commitment to the promotion of responsible gambling
- Gives clear guidance that in order to keep gambling a fun social activity our customers need to "Enjoy, And Play Responsibly"
- Draws attention to further information available in our casinos
- Indicates a source of help, GamCare, that they can access
- Is clear and legible
- Is appropriately and prominently displayed in our casinos in a clean and tidy condition in clear view of customers
- Includes additional signage and leaflets in close proximity to our gaming machines and in discreet locations where possible

## Maintaining integrity

This Policy outlines our duty of care to a customer who appears not to be in control of their gambling or where we are provided with reliable information of that fact by a relative or third party. The integrity of the Policy relies on our staff exercising their responsibilities and, in the case of self-exclusion, supporting the wishes of the customer to be excluded.

Situations may arise where the customer asks our staff to collude with them by giving false information to a relative or third party or during the exclusion period asks staff to 'turn a blind eye' to the exclusion. Staff are expected to comply with the 'Duty of Care' Policy and the 'Customer Self-Exclusion' Procedure and any failure to do so may result in disciplinary action. If our staff are asked by a customer to do anything that contravenes either the Policy or Procedure they are advised to report the matter to their Casino Manager or duty manager.

"Enjoy, And Play Responsibly" will be Apollo Resorts and Leisure Ltd strap line. We want customers to enjoy their visits and play responsibly.

"Enjoy, And Play Responsibly" self help guide leaflets will be made available within the casino. The self help guide will include the following:

- Indicators of Problem Gambling
- Self Exclusion
- Contact details of organisations that can help

Apollo Resorts Limited will make a financial contribution to the to The GREaT (Gambling Research, Education and Treatment) Foundation.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 www.apolloresorts.com

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



### Procedure for Self-Exclusion

Whilst most customers are able to enjoy their gambling Apollo Resorts and Leisure Ltd recognises its duty of care to any of its customers for whom gambling becomes a problem. Our duty of care towards our customers includes the provision of a self-exclusion facility. This facility enables customers to request their exclusion from our casino for a minimum period of six months and a maximum period of five years. At the end of the period of self-exclusion the customer can opt for a further period of self-exclusion or they can make a declaration to re-commence gambling.

1. The customer is provided with a copy of the self exclusion leaflet and has the process explained to them including the full implications of self-exclusion before commencing completion of the documentation, i.e. that the self exclusion scheme cannot be withdrawn or amended during the self-exclusion period. The self exclusion leaflet gives details of organisations where they can seek help, such as Gamcare and Gamblers Anonymous.

When a customer requests self-exclusion from our casino, the customer and the Casino Manager or duty manager complete the Customer Self-Exclusion form.

2. It must be made clear to the customer that they may not change or withdraw their self-exclusion at any time during the period stated by the customer on the self-exclusion form. The Manager must check the self-exclusion agreement and signature. Verify ID and Photo, sign, and give one copy to the customer.
3. The Casino Manager or duty manager will inform all relevant staff in the casino (Management, Reception, Security, and Pit Staff) that the customer is excluded for the period specified on the self-exclusion form and should not be allowed to enter the casino during this period.
4. The scheme does not apply to other operators and the customer may wish to contact other operators to extend their self-exclusion.
5. Remove customer's details from any **marketing** and ensure the customers registration details are marked accordingly so no further admittance is allowed.
6. At the end of the self-exclusion period, at the instigation of the customer, the Casino Manager or duty manager and the customer, reviews the self-exclusion. The Casino Manager informs the casino staff of the outcome of the review.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800





Customer options are:

- a. The customer feels in control of their gambling and does not ask to be self-excluded for another period. The customer is then free to decide whether or not to gamble with us. If the customer decides that they are in control of their gambling and wishes to re-commence gambling, they must discuss their intent with a member management and **24 hours to cool off must pass prior to the customer signing a declaration to re-commence gambling**, which must be retained with the original self-exclusion form.
  - b. The customer wants to be self-excluded for another period.
7. The original form and all copies of the form held will be retained for a period of five years. If exclusion is to continue, the customer will complete a new self-exclusion scheme and the above procedure is actioned again in its entirety.

## **Money lending between customers**

### **1) Objective**

**The objective of the following procedures is to ensure that any significant money lending taking place within the casino that falls into any of the following headings IS TERMINATED WITHOUT DELAY:**

- a) **Commercial** (Profitable, money-making)
- b) **Organised** (Prearranged, planned)
- c) **Systematic** (Orderly, regular)
- d) **Involves Money Laundering**

### **2) Suspicion of money lending**

If any member of staff suspect significant money lending transactions between customers may be taking place within the casino they must immediately inform management.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 www.apolloresorts.com

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800

### 3) Enquiries

Management will make enquiries to determine whether there is any money lending taking place. If there is evidence that shows significant money lending is taking place within the casino, management must initiate an investigation with the assistance of security.

### 4) Investigation and required action to be taken

The investigation must consider whether the findings fall within the following headings and take the appropriate action as described below.

- a) **No evidence of money lending taking place.**  
(No further action required)
- b) **Trivial amounts (Small, unimportant)**  
(A S.I.R. report is to be made for future reference. Also management to take note and monitor the customer(s) to ensure there is no escalation in amounts.)
- c) **Transient (Temporary, brief)**  
(In a case where a customer may for example have given their friend/relative some cash chips to complete their bet for that spin while they are awaiting the encashment of a cheque etc. In this type of case no further action is required)
- d) **Playing together.** (Where maybe husband and wife play from the same bankroll)  
(Should it be discovered that say two people are playing from the same bankroll and management are satisfied that this is genuine no further action is required as long as they are keeping within the stated maximums.)
- e) **Significant (Major, noteworthy)**  
All **significant** money lending transactions which fall into the headings below must take the appropriate action as stated:
  - i) **Commercial (Profitable, money-making)**  
If the evidence suggests any person has become involved in commercial money lending they must be excluded either temporarily or permanently from the casino.
  - ii) **Organised (Prearranged, planned)**  
If the evidence suggests any person has become involved in organised money lending they must be excluded either temporarily or permanently from the casino.



### **iii) Systematic (Orderly, regular)**

If the evidence suggests any person has become involved in systematic money lending they must be excluded either temporarily or permanently from the casino.

### **iv) Money Laundering**

If the evidence suggests any person has become involved in money lending that may involve money laundering a suspicious transaction report must be completed and sent to the Money Laundering Reporting Officer (MLRO) and they must be excluded either temporarily or permanently from the casino.

(In all cases where the operator encounters systematic or organised money lending, a report should be made to the Commission.)

## **Issued By the Gambling Commission**

Conditions and Codes of Practice applicable to:

### **Non-remote Casino Licences**

December 2008

## **Money lending between customers**

### **Ordinary code provision**

Licensees should take steps to prevent systematic or organised money lending between customers on their premises. While the nature of those steps will depend to some extent on the layout and size of the premises, they should cover matters such as:

- systems for monitoring for such activity
- instructions to staff concerning what they should do if they spot what they believe to be significant money lending and to managers about the ways in which they should handle and act on any such lending
- excluding from the premises, either temporarily or permanently as appropriate, any person whom the evidence suggests has become involved in organised or systematic money lending.

There should be appropriate arrangements in place to cover any cases where it appears that the lending may be commercial in nature or may involve money laundering. In the latter case, the requirements in respect of reporting suspicious transactions must be followed. In all cases where the operator encounters systematic or organised money lending, a report should be made to the Commission.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800



## **Ensuring that gambling is conducted in a fair and open way**

To ensure compliance with the 'fair and open' provisions as stated in LCCP the following will be made available to all patrons of the casino:

### **Casino**

Information that will be displayed:

- rules of each game that will be made available to play
- a player's guide to the house edge
- a player's guide to the rules of any equal chance game that are made available
- Manuals for Gaming and Cash Handling Processes will be produced before the casino opens to cover all procedures relating to Gaming, Cash Handling, and Reception which will include "fair and open practices".

### **Bingo**

Information that will be displayed:

- Any admission charges and the charges for playing bingo games.
- The rules of bingo will be displayed

### **Betting**

Information that will be displayed:

- Information about the terms on which a bet may be placed.

All mandatory premises licence conditions will be complied with.

### **Table minimum and maximum stakes**

All table limits will be clearly displayed on each table.

### **Complaints and disputes**

A complaints log will be kept. Should there be any complaint or dispute about any gaming related decision, a member of the management team should be able to settle the problem at the time. However, if the customer is not satisfied with the decision, and all internal avenues of dispute resolution have been exhausted they may refer the matter to the Independent Panel for Casino Arbitration (IPCA). A Gaming disputes procedure will be available before the casino opens and leaflets on the procedures will be readily available for customers. Should a dispute resolution have been exhausted with a dispute regarding Bingo or Betting they will be given the opportunity to refer the matter to an Independent Panel.

**PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING**



### **Gaming Equipment**

All gaming equipment will be inspected and tested where possible by Security and the Gaming staff. Equipment will be purchased from a reputable supplier and where appropriate supplied with a GLI certificate.

### **Suppliers**

ARL only deals with reputable companies and those licensed by the Gambling Commission to ensure any equipment used has been tested by **approved test houses**. This will give us the assurance that the equipment complies with the commission's **technical standards and equipment requirements**.

### **Inventory**

All keys will be listed in an inventory. The inventory will record the lock allocation, number of keys held, including spares and where they are held. It is the responsibility of the Security to ensure this inventory is amended when necessary. The inventory will be retained in the Security Register, in the CCTV room. Keys for gaming related equipment such as drop / cash boxes, machine keys, float boxes, safe keys etc are the responsibility of the Head Cashier, the responsibility of the Security Manager.

### **Issue of Keys**

All keys will be kept in a secure key box or held in individual number-sealed security pouches, and kept in the CCTV office. Keys will be identified by number only and not location.

All keys appertaining to Gaming, Gaming machines, ATM's, and Cash desk will be secured by Security and key logs kept.

In the case of gaming related equipment the keys will be kept securely in the CCTV office.

All keys will be issued only to those persons entitled to have them and will be issued against signature in a Key Register. The Register will show the date, time, key number or location of lock, name of person receiving the key and their signature.

Where applicable, the issue and return seal numbers will also be recorded. The opening seal number will be checked as agreeing with the previous closing seal number, to prove that the pouch has not been opened in the meantime.

The signature of the person issuing the key is also required. When a key is returned, it will be signed back in showing the date, time and name of person returning the key. As above, the closing seal number will also be recorded, where applicable.

**PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING**



### **Casino Gaming Reserve**

In accordance with the method of calculation as stated in LCCP Supplement 6 Apollo Resorts and Leisure Ltd will maintain a gaming reserve/facility for the appropriate amount. The gaming reserve will only be used for the purpose of paying winnings to customers that cannot be met from income or working capital. Should such an event happen the Gambling Commission would be informed via key events and ARL would then ensure as soon as is practical and no later than a month after that use, a schedule for full reinstatement of the reserve.

PROPERTY & REGENERATION • SPORT • LIVE • ONLINE • GAMING

Apollo Resorts & Leisure Ltd PO BOX 50453 London W8 9BP  
T: 020 7937 1773 F: 020 7937 0177 [www.apolloresorts.com](http://www.apolloresorts.com)

Registered Office: 2, Coach Crescent, Shireoaks Triangle, Worksop, Notts S81 8AD. Registered No: 5984800