

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE

NOVEMBER 2023



CAESARS
ENTERTAINMENT®

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



Responsible Gaming is a business imperative for Caesars Entertainment. Our integrated approach to Responsible Gaming is built on clear objectives, measurable outcomes and scientific research and evidence. Professional staff training and state-of-the-art, purpose-built information technology systems support our efforts. This paper outlines our approach to Responsible Gaming and our policies, initiatives and programs.

PHILOSOPHY

Caesars Entertainment is a leader in Responsible Gaming. We believe that Corporate Social Responsibility and a sustainable player base are necessary for continued business success, and we continue to invest and innovate so we can have a positive impact on communities where we operate.

Our goal for Responsible Gaming is simple and unequivocal: We want everyone who gambles at our brick-and-mortar facilities and online platforms to play for the right reason—to simply have fun. We do not want people who gamble irresponsibly to gamble at our, or any, gaming facilities or online platforms.

LEADERSHIP

Caesars' long-standing commitment to Responsible Gaming involves many "firsts" in the industry and Caesars continues to set the industry standard today:

- Caesars in 1999 became the first casino company to offer nationwide self-exclusion and self-restriction options that would be honored and applied across the Caesars network of properties.
- In 2003, Caesars created first-of-its-kind Responsible Gaming training, developing the role of Responsible Gaming Ambassadors. Caesars is proud that in recent years other operators have followed the company's lead and implemented RG Ambassador-based programs.
- Caesars in 2000 was the first company to create and implement principles of ethical operation, the Code of Commitment, and the first Marketing and Advertising Code governing the placement and content of ads.
- Caesars, in partnership with AT&T and the National Council on Problem Gambling, established the industry's first national toll-free helpline in 1995 for gamblers who might need assistance. Caesars was also the first casino company to provide that helpline across a constellation of customer contact points.
- In 2002, Caesars was the first casino company in the United States to develop and broadcast a series of television commercials devoted entirely to communicating a Responsible Gaming message and promoting the helpline.
- Caesars was the first casino company to develop and implement an "RG Log" technology solution to record, track and evaluate employee concerns that a customer may not be gambling responsibly. The RG Log was fully deployed in 2004.
- In 2012, Caesars was the first casino company in the United States to create and implement technology (RGID@slots) to identify self-excluded patrons carding-in at a slot machine.
- Caesars in 2023 adopted an enhanced 21+ gaming policy that limits Caesars Rewards accounts to individuals over 21 and, where allowed by law, limits all domestic gaming, pari-mutuel, sports and iGaming options to over 21.
- Also in 2023, Caesars adopted a universal self-exclusion policy encompassing all gaming offerings, including Caesars Sportsbook, iGaming and its brick-and-mortar facilities. Customers who choose to exclude are not only excluded from their local property or a state exclusion program, but they are excluded from every gaming platform Caesars offers, in one simple step.

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



CAESARS' APPROACH IS UNIQUE

We believe that Caesars is unique within the industry in the development and deployment of Responsible Gaming programming that meets each of the following standards:

- **Incorporates learnings from leading academics in the field of Responsible Gaming research.** When originally formulating the company's Responsible Gaming training program in the late 1980s, Caesars consulted with leading scholars such as William Eadington, Julian Taber and Henry Lesieur. Caesars consulted with a new generation of internationally respected researchers, including Dr. Robert Ladouceur, Dr. Carl Braunlich, and Dr. James Whelan, as well as clinicians in the latest evolution of its Responsible Gaming training curricula.
- **Uses impartial, evidence-based data to inform the development of policies, programs and procedures.** Caesars' Responsible Gaming policy, the training that implements it, and the proactive conversations employees have with customers about their gambling were either crafted by independent leaders in the field of Responsible Gaming and problem gambling or independently validated across properties. The training concept at Caesars took several years to create and implement because the company engaged various stakeholders about best practices, reviewed existing research and regulations, engaged academics, and conducted numerous research studies in a truly collaborative effort.
- **Provides employees with the knowledge and skills to actively recognize and respond to customer requests for Responsible Gaming-related information and referrals, as well as to recognize, respond to, and report Responsible Gaming-related incidents.** We have been providing RG training to employees since the late 1980s, and the training has evolved over three decades to recognize employees' desire and willingness to engage customers who may be experiencing problems related to gambling. Since 2003, we have tracked RG incidents and conducted conversations with customers about their gambling independent of any request for Responsible Gaming-related information.
- **Includes initiatives that educate people about the key principles of gambling, demonstrate how games work, offer tips on responsible play, and provide problem gambling treatment referral and support.** The cornerstone of RG is the informed consumer. We recognize that fostering the potential for individuals to make healthy decisions across a range of products and activities is the critical starting point for public health policy based on informed consent. We want guests to make decisions about their gambling based on accurate and relevant information.
- **Integrates Responsible Gaming with every aspect of the operation.** Responsible Gaming programs are not simply a training course or compliance measure. Everything an operator does should promote Responsible Gaming and it must be a sustained effort, not merely an ancillary class or a brochure. Caesars takes a multi-dimensional approach to Responsible Gaming, ensuring that the company's Responsible Gaming ethic is woven into every aspect of the company structure and culture.
- **Provides Responsible Gaming training for all employees, with specialized training-based employee roles in the business.** It is important to create awareness of the issue among all employees because every employee plays a crucial part in the company's mission to promote Responsible Gaming. A comprehensive education and awareness program helps employees understand the company's Responsible Gaming policies and their roles in promoting Responsible Gaming. The most important thing that operators can train is what employees should do, when they should do it, and how should they do it, clearly explaining the expectations and the employee's individual role in the process.
- **Leverages employee customer service skills to deliver RG services,** with clear delineation of responsibilities and practical tools for those employees who interact directly with customers. In 2003, Caesars made the decision to do what no one else was doing and started proactively engaging guests about Responsible Gaming by integrating the program into customer service processes instead of relying on static messaging. Today, we are very pleased to see other companies are taking the leap of incorporating this customer service ethic into Responsible Gaming policy through broad adoption of Responsible Gaming Ambassadors, a role conceived and created by Caesars.

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



- **Is validated through transparent analysis.** In addition to commissioning academic researchers to conduct independent analysis of the effectiveness of Responsible Gaming activities, Caesars welcomes third-party reviews of its efforts. In 2012, Caesars Windsor became the first casino to receive accreditation under the Responsible Gambling Council's RG Check program. Caesars was also the first gaming company in the UK to receive accreditation by ACE (Accreditation, Certification and Evaluation). Caesars' participation in RG accreditation/certification programs serve not just as external validation of its efforts, but are a source of pride and reminder to employees about the emphasis the company places on RG.
- **Recognizes the primacy of oral communication in delivering Responsible Gaming as opposed to identifying "red flag" behaviors.** Most Responsible Gaming training requires teaching so-called "red flag" behaviors or diagnostic criteria for diagnosing a gambling disorder. Experts that consulted for Caesars on its Responsible Gaming policies identified no consensus on whether or which behaviors are indicative of problem gambling within the casino environment. Indeed, when one examines the American Psychiatric Association's diagnostic criteria for gambling disorder, one recognizes that they refer either to internal, mental states; or to negative effects on personal, job-related, or family life that do not lend themselves to

detection within casinos or other gaming points-of-sale. Therefore, Caesars RG training focuses on verbal statements or comments that customers might make, or that others might make about them—rather than physical behaviors. However, physical, nonverbal behaviors are hardly ignored. To the extent that physical behavior manifests distress or otherwise disrupts the casino floor, the company initially treats such behaviors as security or customer service issues. If while resolving those issues customers make statements concerning negative effects of gambling, then those statements will trigger the Responsible Gaming procedures.

- **Develops and employs cutting-edge Responsible Gaming-specific technology.** Technology should not only provide automated tools for compliance with Responsible Gaming mandates, such as limits on entry or enforcing exclusion requests, but should also provide a means to offer prevention and identification tools for those customers requiring concern. Caesars technology tools, such as RG application and the Responsible Gaming Identification at Slots, identify and prevent restricted and excluded patrons from obtaining gambling services. Further, Caesars' RG2 application allows the company to collect information regarding concerns about patrons' ability to gamble responsibly, allowing this data to be assessed over time and across the company to determine if an RG Ambassador should proactively engage the customer about these concerns.

RESPONSIBLE GAMING PRINCIPLES

We base our Responsible Gaming programs on principles for which there is broad scientific consensus:

- Responsible Gaming is a shared responsibility of governments, regulatory bodies, industry, concerned community groups, individuals and others, and it is best achieved by all stakeholders working together towards common objectives.
- Responsible Gaming strategies should be based on evidence and research, including the potential for unintended consequences, and their ongoing impact should be monitored and assessed.
- The cornerstone of Responsible Gaming is the informed consumer. Strategies to promote Responsible Gaming should start with the aim of providing information so that individuals can make more reasoned and better decisions regarding gambling.
- We promote awareness among our employees and our customers that some people experience gambling-related problems and we encourage customers to be aware of when they may not be gambling responsibly.
- We train our staff to act on concerns when customers make a verbal cue or comment that they or someone they know may not be gambling responsibly. Our Responsible Gaming programs are linked with security and customer service, so in any circumstance where a customer indicates that they or someone they know may not be gambling responsibly, we treat it as a Responsible Gaming incident.

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



RESPONSIBLE GAMING PRINCIPLES (CON'T)

- Our programs support self-efficacy and encourage individuals to make better lifestyle choices. These programs include self-restriction and self-exclusion from our casinos and online gambling offerings. We also promote Responsible Gaming through consumer education that demystifies how gambling games work and that encourages customers to stick with a budget and not to gamble under circumstances where they may not be gambling responsibly.
- We recognize that individuals are responsible for their own behavior, but we reserve the option, when there is reasonable cause to believe that a customer is not gambling responsibly, to exclude that person from our brick-and-mortar gambling facilities and online gambling products. In the long-term, our business sustainability depends on providing outstanding entertainment and customer service to our customers who gamble with us for fun.

CONSUMER AWARENESS AND INFORMATION

Responsible Gaming begins with an informed consumer. We recognize that fostering the potential for individuals to make healthy decisions for a range of activities and products is the origin of sound public health policy.

Caesars commits to making information available to players to assist them in making responsible choices, consistent with their personal preferences and circumstances. We want our guests to make decisions regarding their gambling based on accurate and relevant information. To achieve this, we provide information on our products and services to:

- Educate guests on the nature of gambling as entertainment;
- Educate guests about how our gambling products work, the likelihood of winning, and how the house advantage works;
- Dispel myths about "beating the odds";
- Encourage guests to set limits and to Know When To Stop®;
- Improve awareness of the potential signs of problem gambling; and
- Inform guests about resources (e.g., toll-free Helpline Number for 24-hour assistance) if gambling does become a problem.
- Information is available where it is most accessible to customers, including at gambling facility entrances, on the gaming floor, at automatic teller machines, cashier cages, VIP services, concierge, in hotel rooms and hotel lobbies, and in direct mail to customers. Media includes brochures, posters, videos, social posts and online gambling platforms.

DIRECT MESSAGING

All Caesars gambling-specific print and direct mail and e-mail collateral, marketing and promotional materials communicate the "Know When to Stop Before You Start®" or a similar signature line and a toll-free helpline number. This information is also featured on all gambling advertisements, in brochures and magazines, in hotel directories, on players' Caesars Rewards loyalty cards and applications, on credit applications, and on telephone hold messages. In addition, posters with this information are displayed prominently in high-traffic guest areas and employee "back of house" areas.

DIRECT ADVERTISING

Caesars is the first US-based casino and entertainment company to advertise directly to promote Responsible Gaming. The campaign featured senior company executives as well as frontline employees reinforcing the importance of gambling within a budget, being of legal age and playing strictly for entertainment. The commercials also provide information to those who may have a problem on how and where to turn for help.

¹ Blaszczynski, A., Ladouceur, R. & Shaffer, H. (2004); Shaffer, H. et al. (2015); Ladouceur, R. et al. (2016).

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



RESPONSIBLE MARKETING AND ADVERTISING

Caesars' philosophy is to provide gambling as an entertaining recreational pastime. Consistent with our philosophy, we promote and market our products and services in a responsible manner.

The consensus among researchers and treatment professionals with whom we have worked is that Responsible Gaming can be promoted by encouraging healthy attitudes and beliefs towards gambling.

Accordingly, Caesars is committed to marketing and advertising that:

- Portrays gambling and customers in a responsible manner—designed for adults who choose to gamble;
- Respects local standards of decorum and decency;
- Neither depicts, encourages, nor condones excessive, irresponsible or illegal gambling. We never:
 - State or imply that gambling is an acceptable means of satisfying work or family commitments, or an alternative to work or family commitments;
 - State or imply that gambling is necessary for financial, physical or social success, or a way of solving personal problems;
- Portray individuals who are intoxicated, who are compelled to gamble, who have lost control of their faculties or who have become separated from reality;
- Suggest in any way that excessive irresponsible or illegal gambling is an amusing or acceptable behavior.
- We advertise and market our gambling offerings only to adults above the legal gambling age; and
- We only advertise or market gambling in mediums where more than 73.6% of the audience is reasonably expected to be above the legal age to gamble.

RESPONSIBLE GAMING COMMITTEES

Caesars establishes a Responsible Gaming Committee for its gambling facilities and online platforms to ensure compliance with and effective implementation of both government-required as well as voluntary internal RG regulations.

The Committees give priority attention to all Responsible Gaming efforts, monitor their timely implementation, and measure their quality standards.

CAESARS RESPONSIBLE GAMING STAFF TRAINING

Caesars' approach to Responsible Gaming staff training is based on third-party expert input, research and evaluation. We train all our employees in Responsible Gaming.

Key features of our training are:

- Role-specific training for all staff including new employees, management, back of house and frontline staff.
- Specialized training for Responsible Gaming Ambassadors, available during operational hours, who initiate and conduct conversations with customers on Responsible Gaming issues.
- Integration of security, customer service and Responsible Gaming procedures, so that staff are alerted in circumstances where a customer makes a verbal remark in-person or through online chat that concerns employees that the customer may not be gambling responsibly. That concern is acted on according to established procedures.
- Caesars Responsible Gaming employee training includes:
 - **Responsible Gaming Awareness and Education** training is provided to all employees and provides an overview of Caesars' commitment and leadership on Responsible Gaming.
 - It provides an overview of disordered gambling that emphasizes its causes, its prevalence, the impacts it can have on individuals and their families, and resources that are available to people who may be experiencing problems with their gambling.

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



CAESARS RESPONSIBLE GAMING STAFF TRAINING (CON'T)

- Roles in Responsible Gaming is provided to all customer contact employees and all supervisors. This module is interactive and delineates roles of frontline employees, supervisors and Responsible Gaming Ambassadors. Employees are trained to be aware of and to act on statements that cause concern that a customer may not be gambling responsibly. The training distinguishes Responsible Gaming concerns from customer satisfaction and security issues and explains what employees should expect after they report a concern to a supervisor.
- Responsible Gaming Ambassador training is provided to a senior team members who are empowered to conduct conversations about Responsible Gaming with customers. The training is highly interactive, requiring role-playing and discussions about how to handle various scenarios that may unfold on the casino floor and online. This module covers how and when to conduct Responsible Gaming conversations with customers, what kinds of assistance we can offer customers, and how to use our Responsible Gaming information technology tools.

EXCLUSIONS, RESTRICTIONS AND LIMIT SETTING

Self-restriction and limit setting options are available to customers who want to limit gambling privileges in-person and online.

We offer self-restriction programs and will honor customer requests to:

- Remove them from mail lists for promotions;
- Deny check cashing privileges; and/or
- Deny casino credit privileges.

SELF-LIMIT OPTIONS (DAILY, WEEKLY OR MONTHLY)

- Spending Limit: Set a maximum bet spend for a selected time frame.
- Daily Time Limit: Set the maximum time (measured in hours) that can be spent on an internet gaming system.
- Deposit Limit: Ability to set a maximum deposit limit for a selected time frame: daily, weekly or monthly.
- Loss Limit: Set a maximum loss limit for a selected time frame.

COOLING OFF

Through the mobile wagering account, an individual may select when to take a break from a personal account. The wagering account is deactivated directory by a customer, within a sports betting application, based on the jurisdictional permissible cooling off duration.

If a customer elects to self-exclude, we will honor their request to be denied play privileges. Customers who self-exclude from Caesars or through state sponsored exclusion programs are prohibited from playing at any gaming facility owned, operated, managed, and/or serviced by Caesars, and from being on the premises of our gaming facilities.

Customers who enroll in a state sponsored self-exclusion program in any jurisdiction in which Caesars operates are not only excluded from all Caesars Rewards integrated properties, but are also excluded from every gaming platform Caesars offers.

We also operate a company-initiated exclusion program in situations where Caesars has reason to believe that a customer is not gambling responsibly. We will consider this course of action if we receive substantial and reliable written information that a customer is not gambling responsibly or if a customer reports or states to a Caesars staff member they are not gaming responsibly. This action is only considered if the person chooses not to self-restrict or self-exclude.

RESPONSIBLE GAMING POLICY, PROGRAMS AND PRACTICE



CHECK CASHING

Caesars does not cash payroll, welfare or unemployment checks at any of our properties. In the case of unemployment and welfare assistance, our position is that the funds are intended and should be used for basic food and essentials, whereas gambling is an entertaining, discretionary activity.

RESPONSIBLE GAMING INFORMATION TECHNOLOGY

Caesars has invested more than \$3.4 million to develop, design and implement a Responsible Gaming information technology system, known as RG2. This stand-alone system operates in real time and interacts with other systems across the company. It ensures that self-restriction or exclusion decisions are honored and actioned across our network of properties.

RG2 provides for the entry, viewing, modification and reporting of patrons' RG interactions or related RG activity, such as employee reports of concern and a patron's self-exclusion status. Those records are maintained in the RG Log. This system tracks the time of the incident, the location, the cause of concern, actions taken based on that concern, and related outcomes of that action.

The RG2 operating system and controls identify customers who are excluded or have restricted access to casino privileges. These customers are banned from access to check cashing, credit card usage, jackpot payouts, mailing lists, promotional activity, hotel reservations and registration or creating a Caesars Rewards account, according to their exclusion or restriction status, across all our casinos in every jurisdiction.

Caesars also has implemented a technology solution called RGID@slots, which can identify an excluded customer in real-time through the use of a loyalty card at a gaming machine, which triggers security and other procedures required to address a potential exclusionary breach.

REFERENCES

Blaszczynski, A., Ladouceur, R. & Shaffer, H. (2004).

A science-based framework for responsible gambling: the Reno model, *Journal of Gambling Studies*, 20, 301-317.

Ladouceur, R., Blaszczynski, A., Shaffer, H., & Fong, D. (2016).

Extending the Reno model: responsible gambling evaluation guidelines for gambling operators, public policymakers, and regulators. *Gambling Law Review and Economics*, 20, 580.

Shaffer, H., Ladouceur, R., Blaszczynski, A., & Whyte, K. (2015).

Extending the Reno model: clinical and ethical applications. *American Journal of Orthopsychiatry*, 86, 297-309.



CAESARS
ENTERTAINMENT®

Caesars Entertainment, Inc.
One Caesars Palace Drive Las Vegas, Nevada 89109
702-407-6000 • www.caesars.com

©2023 Caesars License Company, LLC. Know When To Stop Before You Start®.
Gambling Problem? Call 1-800-522-4700.