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JOELSON WILSON

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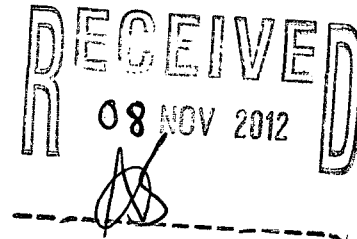
7 November 2012

Our Ref: SCD/CH/G1/853

GUARANTEED DELIVERY

W: www.joelsonwilson.com

The Licensing Service
Business and Consumer Services
Luton Borough Council
Town Hall
Upper George Street
Luton
LU1 2BQ



FAO Martin Grout

Dear Sirs,

RE: APPLICATION FOR A PROVISIONAL STATEMENT FOR A SMALL CASINO –
PROPOSED EXTENDED GROSVENOR G CASINO LUTON TO BE DEVELOPED AT THE
SITE OF GROSVENOR G CASINO LUTON, 35 PARK STREET WEST, LUTON, LU1 3BE

We act on behalf of Grosvenor Casinos Limited. We enclose application for a provisional statement for a small casino in respect of the above-mentioned premises, under s.204 and Schedule 9 of the Gambling Act 2005 ("GA 2005").

Please find enclosed the following documents in support of our client's application:

1. Application for a provisional statement under GA 2005;
2. A cheque in the sum of £8,000.00 in respect of the application fee;
3. Drawing numbers:
 - (a) 7131/600 - Proposed Site Location Plan
 - (b) 7131/601 - Proposed Ground Floor;
 - (c) 7131/602 - Proposed First Floor;

We confirm that the notice of application will also be served on the relevant Responsible Authorities within seven days of 09/11/12, will be published in the Luton and Dunstable Express and displayed at the site of the proposed premises for the relevant statutory period.

You will note that the enclosed application form (together with the prescribed notice) do not have the Luton logo on the front page. As we have advised, we have found that it is not possible to incorporate relevant information easily and accordingly we have used forms, which are exactly the same as those on your website save for the absence of the logo. Thank you for confirming that the use of the forms we rely upon is acceptable.

Our client proposes to operate the premises as a "G" Casino. The Company currently operates 19 such branded casinos throughout Great Britain, with a further 3 currently in development. The brand is aimed at a broad market. The company has developed the

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concept at new sites and re-branded a number of existing casinos previously operating in a more traditional style.

Reference is made at Annex A to the Gambling Commission's Licensed Conditions and Codes of Practice ("LCCP"). It is made clear that the premises will be operated in accordance with the LCCP which are attached to the operating licence held by Grosvenor Casinos Ltd. Please follow this link should you wish to view the LCCP on the Gambling Commission's website:

www.gamblingcommission.gov.uk/gambling_sectors/casinos/holding_a_licence_what_you_ne/licence_conditions_codes_o-1.aspx

Should you require any information, clarification or assistance in relation to the application, we would be grateful if you would contact Suzanne Davies of these offices, who is indicated as the point of contact on the notice of application. Similarly, we would be grateful if any of the other statutory authorities served with notice of the application could also contact Miss Davies should any queries arise.

We look forward to receiving your acknowledgement of receipt of the enclosed application for the grant of a provisional statement for a small casino.

Thank you for your assistance in relation to this matter.

Yours faithfully,

A black rectangular redaction box covering the signature of the sender.

JOELSON WILSON LLP

Encs.

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 <input type="checkbox"/> | Large Casino <input type="checkbox"/> | Small Casino <input checked="" type="checkbox"/> |
| Bingo <input type="checkbox"/> | Adult Gaming Centre <input type="checkbox"/> | Family Entertainment Centre <input type="checkbox"/> |
| Betting (Track) <input type="checkbox"/> | Betting (Other) <input type="checkbox"/> | |

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: GROSVENOR CASINOS LIMITED

[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:

STATESMAN HOUSE
STAFFERTON WAY
MAIDENHEAD
BERKSHIRE

Postcode: SL6 1AY

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

006-000614-N-103221-004

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:

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):

PROPOSED EXTENDED GROSVENOR G CASINO LUTON

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

TO BE DEVELOPED AT THE SITE OF GROSVENOR G CASINO LUTON, 35 PARK STREET WEST,
LUTON

Postcode: LU1 3BE

12. Telephone number at premises (if known): TBC

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.

PLEASE SEE ANNEX 1

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:**

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.

	Start	Finish	Details of any seasonal variation
Mon	0:00 hh:mm	0:00 hh:mm	
Tue	0:00	0:00	
Wed	0:00	0:00	
Thurs	0:00	0:00	
Fri	0:00	0:00	
Sat	0:00	0:00	
Sun	0:00	0:00	

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:

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: ~~XX~~/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/~~XX~~ [delete as appropriate]

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

- Grosvenor G Casino Luton, 35 Park Street West, Luton, LU1 3BE

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

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:



Print Name: JOELSON WILSON LLP SOLICITORS

Date: 7.11.12 (dd/mm/yyyy) Capacity: AUTHORISED AGENTS OF THE APPLICANT

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: (dd/mm/yyyy) Capacity:

[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:

SUZANNE DAVIES

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



23. Postal address for correspondence associated with this application:

JOELSON WILSON LLP SOLICITORS

30 PORTLAND PLACE

LONDON

Postcode: W1B 1LZ

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.

[REDACTED]

ANNEX 1

Proposed extended building to be developed at premises on the corner of Park Street West and Park Viaduct, with the principal entrance on Burr's Place and exits to car park off Burr's Place and exit onto Park Viaduct all at ground level. The proposed casino will comprise gambling facilities and ancillary services at ground floor level, staff facilities and offices to be located at first floor.

ANNEX A

PART ONE

OVERVIEW IN RELATION TO GROSVENOR CASINOS LIMITED'S POLICIES REGARDING THE LICENSING OBJECTIVES

A. Policy to ensure that the business is protected from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime

1. All staff undertake an induction course including an overview of gambling legislation.
2. Specific training on security related issues is provided.
3. A customer registration system is retained to identify every person entering Grosvenor Casinos premises.
4. State of the art full digital CCTV system is installed, including all public areas, external access points, reception areas, gaming tables and gambling equipment, to include a replay system within the pit areas specifically.
5. A "central index" system is located at the London Victoria casino and holds all details of barred customers. Certain behaviours may lead to an individual being barred from all Rank Group Plc premises; in less serious cases, an individual may simply be barred from the premises at which the behaviour occurred.
6. Any incident inside or outside the premises involving anyone seeking to enter casino premises is reported on the Company's system.
7. A money laundering manual is retained.
8. A substance abuse policy is in place.
9. Overview audits are conducted by Rank's internal audit department and external appointed agencies.

B. Policy to ensure that gambling is conducted in a fair and open way

1. A "House Edge" leaflet is provided at each casino site, together with "how to play" leaflets.
2. There is full CCTV coverage of all gaming tables and equipment, including a pit replay system.
3. All machines display the required information in relation to pay-out etc.
4. A comprehensive gaming procedures manual is in place.

5. A non-fraternisation policy is in place.
6. Grosvenor premises operate a Gambling policy (for non-unit based employees).

C. Policy to ensure that children and other vulnerable persons will be protected from being harmed and or exploited by gambling.

1. All under 18's are excluded from Grosvenor Casinos by virtue of the Gambling Act 2005.
2. Proof of age is required in terms of accepted photographic identification to gain entry and to obtain customer registration.*₁
3. Management are specifically trained in relation to problem gambling and intervene to speak with customers identifying symptoms.
4. Gamcare notices and telephone numbers are displayed in all premises and specifically at the cash desk.
5. ATM's are only installed in accordance with mandatory condition 5 attaching to all casino licences.
6. A responsible gambling policy is in place.

*₁ Registration Customer Checks and Controls

Whilst membership is not a legal requirement in UK casinos, and much of the industry has implemented an "open door" approach to entry, Rank Group plc believes that the most effective and responsible way to enforce its self-exclusion policy, and to ensure that customers can play in a safe and secure environment where the underage and undesirables are kept out, is to apply a door registration policy.

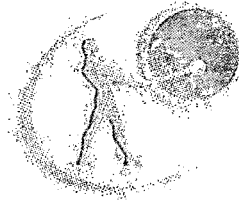
All customers have registration cards which hold specific information. If a customer wishes to gain entry to any premises operated by Rank Group plc, a check is made to establish whether the customer is on the company's database at the appropriate control point. If they are, the database will bring up their personal details and photograph and show whether they are excluded (i.e. for problem gambling) or barred.

If the customer is not on the database, they will be required to produce an approved method of photographic ID, (e.g. passport, Driving Licence or other government issued document). They must also provide their address and date of birth. Even if they do not have ID with them, all customers are still registered, photographed and checked against Rank's central security data base which will show if they are self-excluded or barred. This unique data base is able to hold information on known industry undesirables, even if they have never visited one of Rank Group Plc's premises. However, if a customer appears to be under 21, they may not gain admittance unless they show proof of age documents approved within the LCCP (e.g. passport, Driving Licence, document with PASS logo etc).

Additionally, a search can be conducted through a company called Experian, which will do an on-line check of a wide range of data sources, such as electoral roll, phone and bank account records etc to confirm the customer's identity. Once all has been confirmed, the customer's photograph is taken and stored with other relevant information and admission granted. A registration card is issued to the customer which, as previously noted, if produced upon arrival, is swiped at reception when identification details will be provided and any relevant information made available to staff. Rather than take the "open door" route, Rank has invested in developing ways to facilitate "fast track" entry, such as self-swipe gates, so that customers may enter without delays, whilst still checking everyone against our data base.

Grosvenor Casinos Limited is GAMCARE accredited and regularly audited to maintain accreditation.

The Rank Group Plc is unique in having its own dedicated responsible gambling web site (www.stayincontrol.rank.com) that offers help and advice to all its customers wherever, or however, they play. This web address is included on all Grosvenor Casinos marketing material and otherwise well publicised within the casinos, in addition to the conventional leaflets and other material that are readily available.



Rank Group

RANK GROUP Plc

POLICY ON RESPONSIBLE GAMBLING

The Rank Group ("the Company") fully endorses the three licensing objectives given in Section One of the Gambling Act 2005. With regard to its Responsible Gambling objectives, the Company particularly supports the third objective in *"protecting children and other vulnerable persons from being harmed or exploited by gambling"*.

The Company also fully endorses the social responsibility provisions of the UK Gambling Commission's Licence Conditions and Codes of Practice (LCCP) document and those of the Alderney Gambling Control Commission (AGCC) that regulate Rank's remote gambling businesses.

The Rank Policy on Responsible Gambling ("the Policy") was originally issued in August 2006, and applies to all gambling premises and on-line gaming sites operated by the Rank Group via its subsidiary companies holding an appropriate Operator's Licence. It therefore covers all Rank operated land-based casinos, bingo clubs, Adult Gaming Centres (AGC's) and Licensed Betting Offices (LBO's) operating at the present time, together with all remote gambling web sites run by the Company via its Rank Interactive division.

Company Commitment to Responsible Gambling

- The Company believes that gambling, in all its forms, is a legitimate and increasingly popular leisure activity for a significant proportion of the adult population. Most of these have no problem in ensuring that they gamble within their means.
- The Company accepts that a small number of people sometimes lose control of their gambling and consequently can find themselves in personal or financial difficulties, which can harm both the individual and those close to them.
- The Company recognises that Responsible Gambling is essential to the healthy development of the gaming industry, and that the industry should help those who have problems. Rank participates in this industry initiative by financially supporting the Gambling Research Education and Treatment Foundation (GREaT).
- As well as offering this financial support, the Company acknowledges its responsibility to its own customers and endeavours to protect the vulnerable amongst them. Through the Rank Group Policy on Responsible Gambling and related procedures, the Company has developed a culture that demonstrates a total commitment to Responsible Gambling by its employees.
- In doing so the Company strives to achieve an appropriate and fair balance between maximising enjoyment and minimising harm.

1. Introduction

Applying a responsible approach to gambling is a broad issue. It encompasses specific practical measures to protect the vulnerable, particularly the young, and also those

individuals generally identified as 'Problem Gamblers'. It also embraces a wider obligation on those who control or operate gaming products to act generally in a socially responsible manner.

The Company also has an ethical obligation to work with the Gambling Commission and AGCC to carefully consider the social impact of new products and technologies available to the industry and the methods used to market any gaming product.

Whilst the responsibility for our customers' gambling is their own, the responsibility to exercise a socially responsible attitude in the provision of gambling facilities therefore rests with the Company.

The Company considers it important that all employees are made aware of, and understand, the Policy and related procedures.

2. Advertising, Marketing and Promotion

The Company is committed to using advertising and marketing techniques with particular caution. The Policy is constant for all advertising media, including internet, television, radio, cinema and printed literature.

Advertising and promotions will be compliant with the relevant UK regulatory and advisory codes of practice, being the relevant guidelines of the Advertising Standards Authority's Committee of Advertising Practice (CAP/BCAP). It will comply with the voluntary Gambling Industry "Code for Socially Responsible Advertising" and the LCCP requirements relating to marketing and incentive schemes (Code of Practice 4).

All land based or remote gambling advertising in the UK relating to the Company will carry the address of the industry sponsored web site (www.gambleaware.co.uk) where information on gambling may be obtained.

The Company will not market to persons under the age of 18 years by means of either the content, location or timing of advertising.

All advertising will be legal, decent, honest and truthful with a sense of responsibility to consumers and to society. It will not suggest that gambling is a means of solving financial difficulties.

The Company will not make unsolicited offers of free or discounted alcoholic drinks to customers where the supply is entirely dependent on whether, or for how long, they take part in gambling.

Where the Company pays fees or other remuneration to representatives in order to promote its gaming businesses, they will be paid in a way that takes account of responsible gambling.

3. Product Risk Assessment

Where new and untried products are being considered, the Company will ensure that a risk assessment of the product and the associated marketing has been conducted to determine any particular risks. To do this, the Company will seek the experience of the manufacturers, other operators and those who deal with problem gamblers to determine if the particular product carries any particular or unique risk potential.

The Company will advise customers about the gaming activity on offer and provide help if they do not understand. However, the decision as to when to play, and how much to spend, must always rest with the customer.

None the less, customers will not be actively encouraged to:-

- Re-stake their winnings, as this should always be their own choice;
- Increase the amount they have decided to commit to the gambling activity;
- Chase their losses;
- Continue playing when they have indicated that they wish to stop;
- Enter into continuous play for a prolonged period of time;
- Play or spend beyond that which they intended;

The facility of changing coins, or other methods of payment, back into bank notes is available in all the Company's gambling premises, and will be advised to customers. The ability to transfer deposited funds or winnings back to the customer's bank account is similarly made available and advised to customers.

4. Protecting the Young

The Company is committed to preventing under age persons from using its gambling facilities, and will take all necessary steps to ensure they do not gain entry or register with one of its remote gaming web sites.

Any person who appears to be under the age of 21 will be required to show valid photo ID on entry to a land based premises, also containing a date of birth, as proof of age. Those who cannot provide satisfactory proof of age documentation will be refused entry. Details of the documents shown will be recorded.

Those registering on one of the Company's remote gaming web sites with any card that is available to underage persons will have electronic ID checks completed to confirm their age and will also be asked to verify that they are over 18.

The Company will ensure that its gambling premises and remote gaming web sites display adequate signage stating the minimum age for entry, and the outside of land based premises will not be made specifically attractive to under-age persons.

Suitable barriers or controls to prevent unauthorised entry to premises will be in place, including door supervisors in casino premises (being persons, such as receptionists, who are designate to monitor and record ID for those who appear to be under 21). The Company will maintain strict procedures to ensure that all relevant employees are trained to know the importance of the legal restrictions on age.

The procedures that implement this Policy make it clear that wilful breaches of legislation in relation to underage entry and participation in gambling will be regarded as Gross Misconduct.

In compliance with Section 83 of the Gambling Act, should the Company becomes aware that an underage person has used its landbased facilities for gambling, despite the above controls being in place, the Company will make best endeavours to return any stake or fee to that person as soon as reasonable practical. At the same time, any outstanding prize or winnings for that person will not be paid.

5. Preventive measures to protect the Vulnerable

The Company recognises that "vulnerable" players are not necessarily those who have already developed signs of problem gambling. Those deemed to be "vulnerable" may also be new players or those with the potential to develop symptoms. The Company will therefore provide customer help and information (through posters, leaflets, on-line data etc) to help them identify the symptoms in themselves at an early stage and take preventative action.

As part of this process, the Company will train its employees to use various trigger activity (for example, a certain number of visits, level of play etc) as a prompt to speak to monitor and / or certain players in order to employ "Know Your Customer" (KYC) techniques. Such conversations may not specifically mention the subject, but will assist both the manager, and particularly the customer, in assessing any potential to become a problem gambler.

6. Problem Gamblers

The Company understands the term 'Problem Gambler' to mean an individual who no longer has rational control over their gambling behaviour, with potentially serious consequences for both individual and to others.

The Company will ensure that its employees recognise that true 'problem gambling' is not primarily an economic issue. On occasions, some people lose more money than they might wish, or can afford, but do so without the degree of compulsion or loss of control that might indicate they are 'Problem Gamblers'. However, this may none the less indicate a potential vulnerability.

7. Identifying Potential Problem Gamblers

It is not incumbent on the Company to actively seek out those who may need help. The responsibility for an individual's gambling rests with that person. However, the Company's operational employees will assist when called upon to do so.

If an employee is approached by someone who thinks they have a problem, they will be supportive and sympathetic and direct them to the notices, leaflets and other sources of information from which they can find the support and assistance they need. Where deemed appropriate, or where triggered by a defined activity, the Manager will speak to them personally to discuss the matter.

Unfortunately, people with serious gambling problems will usually do all they can to disguise their problem, and identifying people with problems is therefore very difficult, particularly on-line. The Company's procedures that implement this policy offer examples of behaviour that may assist employees in identifying those with a potential problem.

The Company is not obliged to act upon unconfirmed information that an individual has problems with gambling, particularly from anonymous sources. None the less, the Company may choose to act on information received from an interested third party (such as a concerned family member) if management consider there is some merit in the concerns raised. In such cases, Management will gather all the available facts before deciding whether to speak to the player concerned. They will then make a decision on the best way forward, based on the facts and content of that discussion.

Employees will otherwise draw to the attention of interested third parties the options available to someone with gambling problems, (details of counselling services numbers, leaflets, self exclusion etc) should they wish to help address them.

Whilst, for reasons of Data Protection, the Company will be unable to confirm or deny to any third party that a particular person is one of its customers, employees will offer assurances to third parties that the Company will always act in accordance with its Policy.

One or more member of Management will have been trained to deal with situations that might require a player to be spoken to about potential gambling problems.

A positive response, including communicating sources of help and the possibility of self exclusion, will be given to any customer who themselves admit to having lost control of their gambling, or who is exhibiting symptoms of acute distress.

With the player's consent, the Company may act on any information provided, including information from any treatment agency or service. Similarly, the Company may, again with the player's consent, pass information to an appropriate treatment agency.

All correspondence, interview notes and other relevant information relating to incidents of potential problem gamblers will be collated and held on file for reference and regulatory inspection within the requirements of the Data Protection Act 1998.

8. Self-Exclusion

The Company has no power or capacity to administer an industry-wide self-exclusion scheme, but will implement its own scheme intended to prevent any individual who so requests from having further access to any of its own gambling premises within the sector(s) requested.

When seeking self exclusion, customers will be offered the opportunity to exclude from some or all of the Company's other land based and remote gaming sectors.

The Company will encourage all persons who request self exclusion to similarly exclude themselves from other gambling premises in the area. Where requested, such customers will be provided with contact address details of competitor Head Offices so that they may more easily seek self exclusion from other local premises.

Wherever possible, requests to be excluded will be accepted from a player in writing and forwarded to the DCRG (see point 13). However, where a player declines to sign a written request and seeks self-exclusion verbally, the request will normally carry the same weight as a written request, unless the source cannot be verified as being the player (for example, over the phone).

However, verbal self exclusion requests made by phone to the company's remote gaming web sites will always be accepted provided the caller can verify their identity by answering the appropriate security questions.

Any request (written or verbal) will be acknowledged in writing as soon as practicable and will inform the player that their exclusion will remain in force for at least 6 months. For convenience, a detachable self exclusion form will be included within responsible gambling leaflets provided on the company gambling premises and will also be downloadable from the Company's web sites.

Reversal of a request will only be considered after a period of six months and then only approved by the DCRG after full and careful consideration. The decision will be fully documented. Reinstatement will be preceded by an interview with the customer, and a reassessment of any mechanisms that might help to control frequency of visits and spending levels.

Self exclusion will otherwise remain in place indefinitely unless, or until, the customer themselves requests re-instatement after a minimum period of six months. Requests to re-instate will not be automatically granted and will be refused if the Company is not satisfied that the customer has suitably addressed their issues.

Re-instatement will always take up to a week to implement, due to the period of investigation, customer interviews and due consideration applied before a decision is made. The Company will therefore always exceed the 24 hour "cooling off" period otherwise stipulated in the UK Gambling Commission's LCCP after a re-instatement requested has been made.

9. Enforced Exclusion

In exceptional cases, following consultation between the DCRG (see point 13), the Area Manager / Director and local / on-line gaming management, and where it is felt to be the best course of action to protect the customer, the Company may choose to exclude a customer, even when not specifically requested to do so by the customer concerned.

This form of enforced exclusion will be reserved as the last resort for those players whose relationship with gambling appears to be compulsive, in the Company's view, but where all previous attempts to offer help have been declined.

It is accepted that customers who do not recognise their problem and are subject to enforced exclusion are highly likely to then gamble at other premises instead where they may not be so well monitored. The Company's primary approach will therefore always be to help, support and encourage a customer to take control of their gambling problem themselves.

10. Communication to Customers

The Company will provide leaflets outlining some of the characteristics of problem gambling. These are intended to help individuals identify and understand their problems and will be made available in all the Company's gambling premises. Similar information will be made available to its remote gambling customers via its websites.

It is unlikely that a person who may have a problem with their gambling will wish to pick up a leaflet from a conspicuous place in the premises. Therefore, although leaflets will be on display in locations where they are clearly visible to players, (for example at reception entry points), they will also be located in areas where a player may acquire them discretely - for example, in, or close to, toilet facilities.

Posters drawing attention to the existence of the leaflets and the self-exclusion scheme will also be displayed close to the location of the leaflets. As the leaflet text will also be downloadable from the appropriate Company web site, posters will therefore refer to the web address as a further possible source of information.

Posters and on-line information will give clear guidance that, in order to keep gambling a fun leisure activity, the customer needs to stay in control.

Posters will be large enough, and prominent enough, to be easily seen and understood.

A nominated employee will be responsible for the stocking of leaflets and the appearance of posters and other material in land based premises.

A telephone help-line number for a problem gambling support agency (such as Gamcare) will be displayed on all ATM's and gaming machines operated in the Company's gambling premises and will also refer to the availability of the leaflets. Similar contact details will be made available on the Company's remote gaming web sites.

11. Assisting in self control and "Reality Checks"

The Company will take steps to help individuals monitor or control their gambling by helping them restrict the amount of time that they may gamble or the amount they may spend. For example, restricting the amount that land based customers may draw against cheques or debit cards to mutually agreed limits. Where practical and appropriate, other "reality checks" will be made available.

12. Employee Training and Education

The Company will ensure that all gaming managers fully understand this Policy and have access to current information on problem gambling, particular areas of vulnerability and the potential impact of new products. The Company will encourage management to take ownership of the Policy and its related procedures.

Through training, all managers and relevant employees will have knowledge both of the signs and behaviours of a problem gambler and of the availability of the agencies that may offer support.

The General Manager and his / her deputy for each of the Company's gambling premises will be given training in how to hold intervention conversations with customers about issues highlighted within this Policy. Similar training will be given to appropriate management in the Company's remote gaming division.

Whilst such detailed training for more junior land based employees is not appropriate, all employees will be given a general overview of the potential issues, and their own responsibilities, through the procedures covered in relation to this Policy. Customer Service employees responsible for taking calls from the Company's remote gambling customers will be given specific training in being alert to potential problem gambling behaviour.

All gaming employees will :-

- Be made aware of this Policy during basic training;
- Be instructed not to encourage players to re-stake winnings, increase the amount they have decided to stake, chase losses, continue to play when they have decided to stop, or enter into play for a prolonged period of time;
- Be aware of the clear procedure as to when they should refer any concern they may have to a more senior colleague.

Where employees are themselves permitted to gamble, either in Company premises or elsewhere, the Company will take all reasonable steps to make the same information and advice available to employees as is available to customers, should their own gambling become a problem. A separate Employee Gambling Policy is in place to cover responsible gambling issues relating to the Company's employees.

13. Role of Compliance & Security and the DCRG

The Company has appointed a Director of Responsible Gambling, who is the Director of Compliance. The Director of Compliance and Responsible Gambling (DCRG) will oversee that the procedures and training relating to this Policy are implemented.

The DCRG will ensure that the Company's central index records relating to Problem Gamblers are maintained. Central Index is otherwise a function of the Security Department, under the Director of Security.

The Company will use its own Internal Audit facility to ensure that its employees are complying with the procedures and records that implement this Policy.

All re-instatement decisions, relating to problem gamblers who are excluded, will be made by the DCRG, who will consult the Area Manager / Director and, where necessary, the Managing Director of the relevant Division.

The Rank Group Plc
Updated August 2012 (originally issued August 2006)



stayincontrol.rank.com

NOTICE OF APPLICATION FOR A PROVISIONAL STATEMENT (Form A)

This notice is issued in accordance with regulations made under section 160 of the Gambling Act 2005

Notice is hereby given that: GROSVENOR CASINOS LIMITED

[Give the full name of the applicant as set out in Part 2 of the application for a provisional statement]

of the following address:

STATESMAN HOUSE
STAFFERTON WAY
MAIDENHEAD
BERKSHIRE

Postcode: SL6 1AY

[Give the full address of the applicant as set out in Part 2 of the application for a provisional statement]

the number of whose operating licence is 006-000614-N-103221-004

~~who applied for an operating licence~~

[Delete as appropriate. Insert the reference number of the applicant's operating licence (as set out in the operating licence). Where an application for an operating licence is in the process of being made, indicate the date on which the application was made.]

has made an application for a provisional statement in respect of the following type of premises:

SMALL CASINO

[Specify the type of premises to which the application relates]

The application relates to the following premises or proposed premises:

PROPOSED EXTENDED GROSVENOR G CASINO LUTON TO BE DEVELOPED AT THE SITE OF GROSVENOR G CASINO LUTON, 35 PARK STREET WEST, LUTON, LU1 3BE

[If known, give the trading name to be used at the premises and the address of the premises as given in Part 3 of the application. If the premises have no address, then describe the premises and the location in the same way as they are described in Part 3 of the application.]

The application has been made to the following licensing authority:

The Licensing Service, Business and Consumer Services, Luton Borough Council, Town Hall, Upper George Street, Luton

Postcode: LU1 2BQ

Website: www.luton.gov.uk/casino

[Insert name of the licensing authority and the address of its principal office, followed by the address of its website]

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

The following person connected with the applicant is able to give further information about the application:

SUZANNE DAVIES - 020 7580 5721

scd@joelsonwilson.com

[This entry is optional and is to be included if the applicant wishes to provide the name, telephone number and (if available) e-mail address of a person connected with the applicant who is able to answer questions and provide further information about the application.]

Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date: 7 DECEMBER 2012

[Please insert last day on which representations may be made in relation to the application. The period for making representations is 28 days (inclusive) starting with the day on which the application for a provisional statement was made to the licensing authority.]

