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Lucien Barrière
Hôtels & Casinos

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LUCIEN BARRIÈRE HÔTELS & CASINOS' RESPONSIBLE GAMING COMMITMENT

CASINO OWNERS, GAMING EXPERTS

- Gaming is everywhere in our society nowadays (70% of the French public say they have played at least once for money over the last year) and still has considerable potential for further growth. With this outlook, casino chain owners are considered experts and have forged a constantly growing reputation for professionalism and rigor over the last few years.
- Our chain currently consists of 196 casinos with over 23,000 slot machines and over 1,500 gaming tables. This gives us unique experience and expertise in gaming that naturally prompted us, a long time ago, to ponder the issues of gambling. Indeed, when you are in charge of eight million customers, like us, representing a total of nearly 35 million “gaming” entries in our casinos, questions relating to excessive gambling are issues that cannot be ignored. Our way of handling the issues is not new: our profession has been committed to Responsible Gaming for many years, working with the best specialists, trying out particularly innovative and instructive experiments in our casinos.
- Unlike other operators who only entered the market through on-line gaming, the casino industry is based on recognised past expertise, stemming from practice and unrivalled insight. This professionalism founded on experience establishes an essential role for our casinos, in harmony with our on-line gaming offer.
- Casinos are currently one of the most tightly controlled businesses in the world. As we are used to extremely strict regulations and the most rigorous governmental checks on all our activities, we have an obligation of transparency, from which we never waver. Gaming integrity is guaranteed both by casino chains themselves and by ongoing surveillance from the French Ministry of the Interior and the Ministry of Finance.

Professionalism, compliance with rules, expertise and customer focus are the cornerstones of the action plan: these are the assets which allow us to present an exemplary Responsible Gaming policy.

LUCIEN BARRIÈRE HÔTELS & CASINOS, COMMITTED TO AN INNOVATIVE RESPONSIBLE GAMING POLICY

Responsible Gaming is nothing new for Lucien Barrière Hôtels & Casinos. We have been, and always will be, pioneers in the casino business. This constant concern is backed by a principle underpinning our philosophy:

“Gaming is a pleasure and should always remain so”.

Saying that means acknowledging that some gamers can sometimes lose control, when pleasure turns into addiction. Lucien Barrière has always accepted this fact, which although affecting very few people, is nevertheless a real problem for some of our players

While excessive gambling exists, it does not have to be a problem. The action plan we suggest strengthens and generalises the procedures we have tried out for over 10 years.

The plan was based on two factors from our gaming expertise:

- 1. Prevention is effective:** by informing players and offering advice on how to control gambling, we can considerably reduce excessive risks.
- 2. There are ways to help players in difficulty regain control over their gambling:** observation within the casinos, detection, guiding and monitoring players out of control are key in this respect.

This effective and professional approach, based on knowledge and detailed analysis of players and their gaming behaviour, has allowed us to provide concrete solutions to gambling issues, both in our casinos and on-line.

New issues arose when on-line Poker first emerged:

- Does a player behave the same way behind a computer screen as in a casino?
- Can players at risk be detected on-line?
- Can on-line players' ID be checked efficiently?
- What gaming restrictions are available to players?

All these questions prompted us to rethink and extend our Responsible Gaming policy to design a specific internet plan, which takes account of the specific features of on-line gamers and new technologies.

Given that we have spent so much time thinking about all these issues over so many years, we are now well ahead in terms of Responsible Gaming, including on the internet.

Dominique Desseigne,
Groupe Lucien Barrière Chairman and CEO
Chairman of SFCMC

Christian Meunier & Jacky Sticker,
Groupe Lucien Barrière
Managing Directors

I. LUCIEN BARRIÈRE HÔTELS & CASINOS' RESPONSIBLE GAMING EXPERTISE

Lucien Barrière Hôtels & Casinos' commitment to Responsible Gaming has been a determined, national commitment for several years now:

- The Group was the first French casino chain to design a Responsible Gaming guide, made available to players at all our casinos and to set up partnerships with organisms and medical centres specialising in recognised addiction management, since 2004.
- Since 1999, the Group has also been involved in government or industry initiatives promoting several campaigns including the Union of Casinos in France Charter of Ethics.

This national campaign is now in effect in all Lucien Barrière casinos, and is based on an action plan which was set up and tried out a few years ago in certain Barrière casinos:

A / CASINOS BARRIÈRE IN SWITZERLAND: AN UNRIVALLED EXPERIENCE

In Switzerland, where Lucien Barrière Hôtels & Casinos owns three casinos/gaming houses (Courrendlin, Fribourg and Montreux), regulations are much stricter than in France and they have become a model for Lucien Barrière Hôtels & Casinos generally.

Since 2004, the edict on Gaming Houses defined a programme of compulsory social measures:

- Gaming House staff training to detect potential gambling addicts as soon as possible
- Communication and support: addiction information must be clearly posted in Gaming Houses, including self-evaluation questionnaires, or at least consultation centre details
- Access and prohibition checks: refusing access to under 18 year-olds, checking digital ID, excluding insolvent (bankrupt) players and providing VLA conditions.

Exclusions

Exclusions can be voluntary or compulsory. After a meeting about their gaming habits and financial situation, customers in difficulty often request voluntary exclusions.

Exclusions last for at least one year and may only be lifted after the player's financial situation and mental state have been reviewed.

Only the Gaming House which posted the exclusion can lift it. In the case of staff refusal or a negative result to the request, the player remains excluded and the decision can only be lifted a year later.

Visit Conventions

2005 marked the start of the "Visit Conventions" system, designed by Casinos Barrière and backed by the Swiss Casino Federation.

The convention is set up between the customer and the casino, who decide on a number of monthly visits to the casino: 1, 2, 4 or 8 times per month over a minimum period of 3 months up to a maximum of 24 months. Compulsory meetings regularly take place with the Head of Social Measures at the casino.

The Casino Barrière de Montreux, for example, arranges a meeting after the first 3 months, then another after 5 months and every 6 months.

Since 2008, upon request of the Federal Gaming Board, the convention visit conclusions should only be made after the customer's financial situation has been evaluated. If negative, the customer in question should be excluded from the casino.

The convention visit system is managed by the same system as the exclusion system and is valid throughout all Swiss casinos. For example, a customer limited to 2 visits per month who goes to the Fribourg casino will only be accepted once at the Montreux or Courrendlin casinos during the same month.

In 2010, upon request of the Federal Gaming Board, the Swiss Casinos Barrière also set up a system to limit bets placed by customers under visit convention agreement. This provides a full follow-up of all visit-convention customers.

Moreover, the Casino Barrière de Montreux has teamed up with the Centre for Excessive Gambling and the Valaisanne Anti-Addiction League to carry out follow-up visit-convention meetings. All customers using visit conventions are seen at least once by the Centre for Excessive Gambling supervisor as well as the casino's Social Measures Manager. This alliance communicates multilateral information about excessive gambling and can allow customers to have therapy. This pilot project could soon be applied at the Fribourg and Jura Barrière casinos.

KEY FIGURES

- **4** Social Measures managers work full time in the Swiss Barrière Casinos.
- **356** voluntary gaming exclusions in 2010.
- **126** visit conventions in use end 2010. Swiss Casinos of Lucien Barrière Hôtels and Casinos are part of the 5 ones to continue this prevention system in Switzerland. The Group manages **94.5%** of the conventions in use in Switzerland.
- **24** visit-convention customers were seen by the Centre for Excessive Gambling or by the Valaisanne Anti-Addiction League in collaboration with the Swiss Barrière Casinos.
- **34** training courses (102 hours) in 2010 for Swiss Barrière Casino staff from the Centre for Excessive Gambling in Lausanne, reference in French-speaking Switzerland on gambling addictions
- **16** basic training courses, 48 hours of training.
- **18** continuous training courses, 54 hours of training.

¹ Swiss equivalent of a French Responsible Gaming Supervisor

B / ENGHIEEN-LES-BAINS, FRANCE'S PIONEER CASINO

The Casino Barrière d'Enghien-les-Bains, leading casino in France, is an exemplary business. As early as 2004, a non-intrusive customer gaming behaviour observation plan and excessive gaming situation management was set up in collaboration with specialised medical centres, regulatory authorities, official heads of public liberties and casino professionals.

Two commissions have been set up:

- The first, the **Internal Commission** (made up of Casino Barrière d'Enghien-les-Bains employees), works to implement an excessive gambling prevention plan via staff training and general awareness of the problem.
- The second, the **External Commission**, includes input from two Professors of Medicine. Their goal is to establish an action plan to implement against excessive gambling. In line with this objective and since 2007, a member of the Board is exclusively in charge of excessive gambling and prevention.

Its objectives:

- Chairing the Internal Commission;
- Ongoing monitoring of the prevention plan set up by the national commission;
- Training and involving staff;
- Private interviews with detected players;
- Posting information about Responsible Gaming in the most visible areas of the casino.

Casino Barrière d'Enghien-les-Bains has formed a close partnership with specialised addiction centres at the Louis Mourier Hospital (Colombes) and at the Marmottan Hospital (Paris) for customers who ask for therapeutic help. The customers are also sent to the Montevideo Clinic in Boulogne-Billancourt.

In 2009, the Casino Barrière d'Enghien-les-Bains was asked to take part in a national scientific survey by Nantes Hospital, (first hospital in France to officially research excessive gambling and problem gaming).

The on-going survey (lasts 5 years) is based on individual interviews held with players. It is based on internationally approved systems. The interviews are held by psychologists from the Louis Mourier and Marmottan hospitals, are strictly confidential and do not interfere with the smooth-running of the gaming areas.

They aim to compare the socio-demographic characteristics of three groups of players:

- Non-problematic players (NPP),
- Non-problematic players having treatment (NPPT),
- Problematic players having treatment (PPT).

C / PARTNERSHIP WITH LOCAL ASSOCIATIONS IN CANNES

The Responsible Gaming plan led by the Barrière Croisette & Barrière les Princes Casinos began in 2004. Both casinos call upon the skills of SOS Joueurs (SOS Players), a national association founded twelve years ago to help players who were losing control over gambling. The partnership is a first in France.

Continuous training courses for casino staff with SOS Joueurs were therefore set up to learn how to detect a player losing control, how to establish contact with the player and guide the player towards concrete solutions. The course has become a major step in induction courses for Barrière Casino staff in Cannes, especially the croupiers and slot machine agents.

After these pioneering and important tests, Lucien Barrière Hôtels & Casinos went on the take advantage of the opening of two new-generation casinos to test a wider prevention plan on the risks of addiction. The Barrière Casinos in Toulouse and in Lille have also fully integrated the Responsible Gaming plan into their business.

D / A PLAN FOCUSED ON PLAYERS IN TOULOUSE

From the temporary casino in 2006 to the opening of the final building, in September 2007, the Casino Théâtre Barrière de Toulouse led a dynamic policy on gaming addiction prevention, instigated by its chief executive and director responsible.

The casino's operational plan is as follows:

- Appointing a Responsible Gaming Supervisor, a trained psychologist to ensure the Group's Responsible Gaming policies are applied, in constant contact with head office;
- Internal staff training from the Responsible Gaming Supervisor, within 90 days of taking office;
- Setting up a monthly Responsible Gaming commission, chaired by the Director Responsible, and made up of 15 people: hospital doctors + members of staff from the Casino Théâtre Barrière de Toulouse.

The Commission's objectives:

- Introduce Group policies
- Liaise with doctors about the casino's Responsible Gaming policies and addicted players (while preserving customer anonymity)
- Monitor players in difficulty and voluntary exclusion customers
- Work on potential improvements (regarding communication, posters, training, etc...).
- Ongoing plan evaluation
- Participate in scientific research by taking part in surveys on gambling (work underway: the effects of certain pharmaceutical molecules on addictive gambling)

- Set up a partnership with the addiction centre at Purpan Hospital under the supervision of semiskilled doctors:
 - a local medico-social centre providing an attentive ear, advice and offering specialised treatments.
 - doctor's participation at Responsible Gaming commissions to advise the casino about its prevention policies and practices
- Place publicity documentation, in particular the Responsible Gaming Guide, in places where a lot of people pass through;
- Limit payments authorised by slot machine cashiers to limit compulsive behaviour (upon customer request);
- Offer voluntary exclusion to customers, involving an interview and a contract between the casino and the customer. Once under contract, the customer can no longer enter the gaming zones at the Casino Théâtre Barrière de Toulouse for a set period of time. At the end of this period, support is always offered to help customers use the game control procedures (e.g. access limits, appointments with the Responsible Gaming Supervisor, means of payment checks etc.) to avoid falling back into financial difficulty;
- Offer limited access for which the customer may choose a set number of visits per month, which cannot be exceeded.

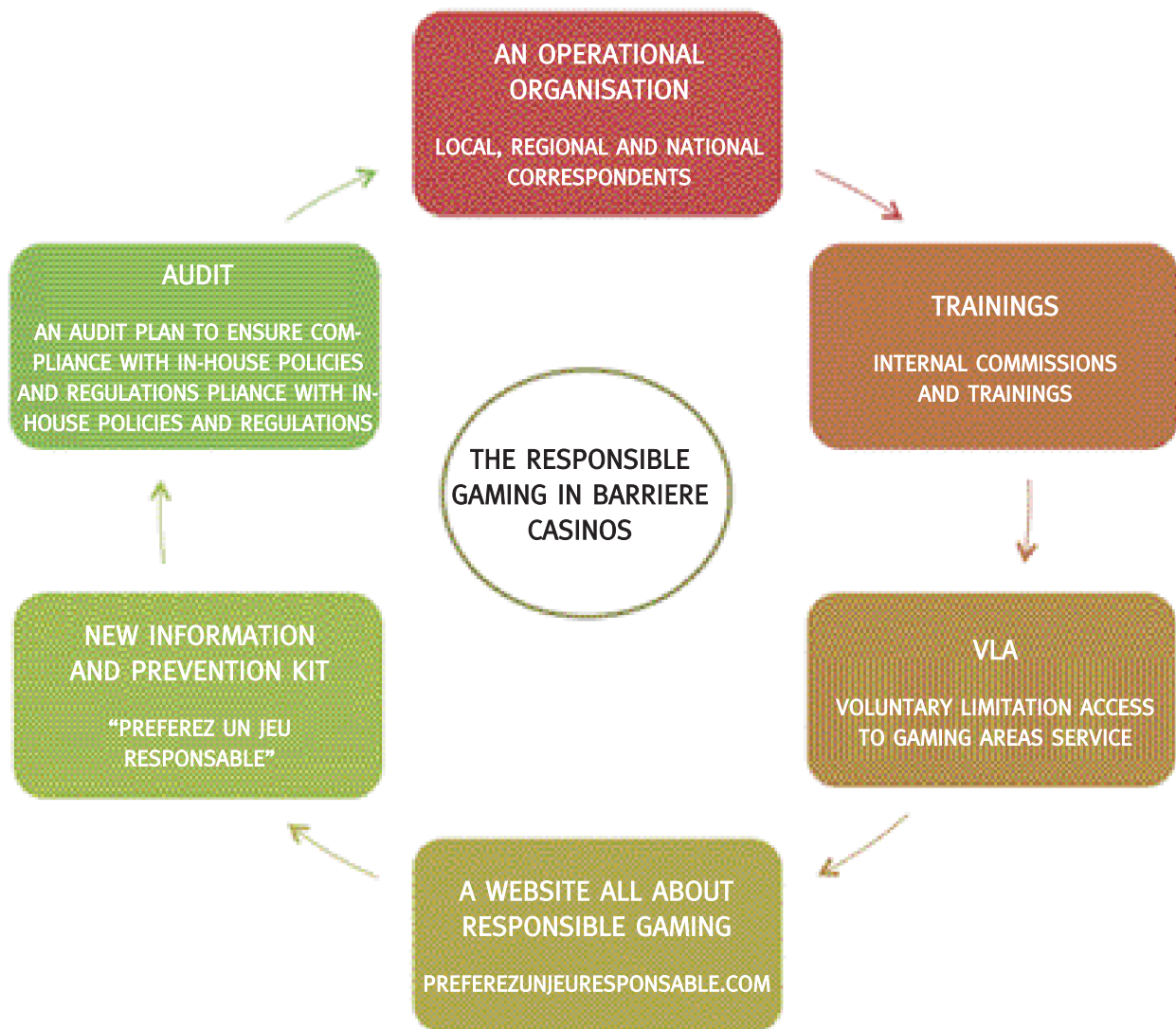
E / LILLE FAVOURS PSYCHOLOGY

Once the Casino Barrière de Lille opened in November 2007, an operational prevention plan was set up in line with the updated measures in the Group's Swiss casinos– the plan was recognised by the Swiss regulatory authorities as the most advanced and most effective plan existing in active Gaming Houses.

The plan includes the following measures:

- Appointment of a Responsible Gaming Supervisor, employed by the casino and working exclusively on the prevention plan;
- Training each member of staff by the casino's Responsible Gaming Supervisor, to ensure recognising, reporting and monitoring players at risk;
- Player protection measures: entry checks, ID, follow-up, information and prevention, individual listening and advice during private interviews (players and people close to players, guidance towards medical centres, VLA, voluntary bans;
- Monthly meeting of the Internal Responsible Gaming Commission: an exchange of information useful to personal customer support and fully confidential;
- Making the Responsible Gaming Guide and the Responsible Gaming Supervisor's details (free, direct line) available to all customers;
- Liaison with the Addiction Centre at Lille Hospital;
- Systematic evaluation of the entire plan, aiming to continuously improve and to adapt to future changes at the casino.

II. AN INNOVATIVE, UNIQUE, GLOBAL PLAN



A / AN OPERATIONAL ORGANISATION

A COMPLETE RESPONSIBLE GAMING NETWORK

To ensure application, follow-up and reporting measures concerning Responsible Gaming, a real network of experts was set up this year, nationally and on-site:

■ **NATIONALLY: A RESPONSIBLE GAMING COMMISSION**

The objective is to determine a national policy on Responsible Gaming and to ensure it is applied and monitored in practice.

The commission will meet 4 times a year on average and is made up of 15 people.

■ **REGIONALLY: A REGIONAL CONTACT**

The objective is for a member of the *National Commission* to liaise between the casinos in the region and the national commission, organise and run quarterly meetings with local correspondents in the region and compile statistics on the casinos in the region, and also support and advise local correspondents about setting up and applying the national plan. The Regional Contact is usually also the Responsible Gaming Supervisor in a Barrière casino.

■ **LOCALLY: LOCAL CORRESPONDENTS ON EVERY SITE:**

THE RESPONSIBLE GAMING SUPERVISOR OF EACH CASINO

The objective, on-site and under the Managing Director's authority is for the Local Correspondent to manage relations with customers in difficulty (through observation, detection, management, monitoring, support and guidance). The Local Correspondent ensures application of all the Responsible Gaming policies in the casino (setting up LVA, implementing the Responsible Gaming information kit, training all staff on excessive gambling prevention etc.).

■ **ON-LINE POKER: A DEDICATED PLAN**

Lucien Barrière Hôtels & Casinos gaming website, *BarrierePoker.fr* illustrates the exemplary nature of the Group's Responsible Gaming actions.

In fact, since the beginning of BarrierePoker.fr, Groupe Lucien Barrière and La Française des Jeux, who both instigated the project, have continued to develop actions to introduce Responsible Gaming and ethics in the business:

- Via internal staff: increasing employee awareness, Responsible Gaming review of new functions and ARPP advertising regulations charter application (ARPP: Autorité de Régulation Professionnelle de la Publicité).
- On the website:
 - Information on potential risks, messages and various pictographs for minors, easy access to the "Responsible Poker" guide and a direct link to the Ministry of the Interior.
 - Moderators set up to help the player with his/her gaming behaviour:
 - Self-exclusion: during a period chosen by the player from the list of suggested periods, or definitively, and arranging post follow-ups;
 - Limiting the deposit, allowing players to set themselves barriers;
 - Limiting the amount bet, defining a maximum amount per week, valid at the Cash Game tables and the Sit & Go tournaments.
 - Bank transfer limits;
 - Checking players on the prohibited player register.
- - For real casino Poker customers: fixing instalments and weekly bet limits.

Players manage their own relationship with the game and BarrierePoker.fr supplies tools and resources to get a good grasp of Poker (Responsible Poker Programme – services to manage your poker playing).

BarrierePoker.fr also accompanies players via a personalised customer relations centre (direct line +33 (0)9 69 39 29 19).

The BarrièrePoker Responsible Gaming policy will continue to develop with the self-evaluation services and gaming moderators integration.

■ STAFF TRAINING

Article 15 of the new gaming regulations in casinos in France (decree dated 14th May 2007) stipulates that “all new gaming employees on detecting players on risk, within 90 days of starting their jobs”.

Lucien Barrière Hôtels & Casinos is fully committed to this policy.

A Responsible Gaming Trainer training course has been set up in all the Group’s French casinos.

The course lasts for one day and is given by an external trainer. It was originally intended for the 35 Responsible Gaming Supervisors from each French Barrière casino, but little by little its influence has grown.

The course’s aim is to develop trainer talents so they are able to make all new employees aware of excessive gambling situations and how to recognise the signs and detect players at risk as soon as possible.

In certain casinos, up to 3 internal trainers were trained. Today, there are nearly 60.

During the course, future trainers receive a training kit to help run the courses with new employees:

- how to manage a group: preparing the meeting, creating group dynamics, managing the breaks, how to train senior employees and how to deal with objections,...
- explaining Lucien Barrière Hôtels & Casinos new global policy on Responsible Gaming
- a reminder of the current gaming regulations in France
- explaining how to use the training kit to its full advantage.

In addition to regulations for new employees, the Group would like all employees in contact with customers to be informed about the Responsible Gaming policy.

Moreover, Lucien Barrière Hôtels & Casinos intends to go even further by setting up in 2012 a more specific course for all management and internal commission members.

B / A NEW CUSTOMER SERVICE:

VOLUNTARY LIMITATION ACCESS TO GAMING AREAS (VLA)

The Voluntary Limitation Access is at the heart of Lucien Barrière Hôtels & Casinos Responsible Gaming plan. The service is available to Barrière casino customers who wish to reduce the amount of visits paid to a casino.

A plan such as this is completely new and is in line with the latest progress in addiction medical research. It intends to encourage ways to regain control over player gaming behaviour instead of an often unrealistic complete break that leads to a relapse in nearly 60% of cases.

The VLA is valid in all Barrière Casinos and is a system of time credit set up over a period of minimum three month to maximum 24 months. The customer can choose from 1 to 8 visits per month maximum and can use the time credit at any time.

When all time credit has been used, entry to the casino is refused, in accordance with the formal contract between the customer and the casino. It is not possible to carry forward unused credits.

The time credit must be used, independently, in all Barrière Casinos. For example, a customer who chose two monthly visits by signing a contract at the Casino Barrière of Bénodet, will use both if he/she visits the Casino Barrière of Bénodet and the Casino Barrière of Carnac during the same month. The customer will be obliged to wait for the following month to be admitted to a Barrière Casino again.

For customers who have set up VLAs, including Casinopass card holders, will not receive any publicity enticement (via post, email or text messages).

It is impossible to break off a VLA contract once signed.

This tool offers the possibility to detect real gambling risks. We should add that this innovation, unprecedented in France, is no substitute for a customer's request for national exclusion, but is an addition to the range of solutions suggested to face situations of varying importance.

During 2010 (Nov. 2009 - Oct. 2010) 1,200 customers signed VLA contracts with Barrière Casinos.

² To make players' life more simple, the Barrière Casinos offer the Casinopass card for quick access, a substitution to ID presentation at casino entrances. This free card with no obligation is valid for two years in all Barrière Casinos in France.

C / AN AUDIT PLAN TO ENSURE COMPLIANCE WITH IN-HOUSE POLICIES AND REGULATIONS

Internal audits are carried out regularly within the Group to aim at better Responsible Gaming policy management.

The following items are audited:

- The quality of employee training courses on detecting customers in trouble;
- The existence of a Responsible Gaming Commission;
- Evaluation of existing plans designed to identify and monitor customers who are considered at risk: tools, interviews, monitoring etc.
- VLA promotion and good local management;
- Posters and brochures about Responsible Gaming present.

Thanks to these audits, indicators have been centralised by the *National Commission* to manage and know what Responsible Gaming policies are in force in each Barrière Casino.

D / A WEBSITE ALL ABOUT RESPONSIBLE GAMING

The Internet is the best place to seek information, particularly about a taboo subject such as gambling addiction. The Internet is the ideal way to carry out anonymous research. Before on-line gaming was authorised in France, Lucien Barrière Hôtels & Casinos started offering offline and online players a professional website in 2009, which provided completely transparent information, advice and useful contacts regarding Responsible Gaming.

www.preferezunjeuresponsable.com

- Informs players and the general public about excessive gambling risks;
- Offers useful advice on controlling gaming and learning about casinos in confidence;
- Helps players in trouble and their friends and family by putting them in contact with professional partners

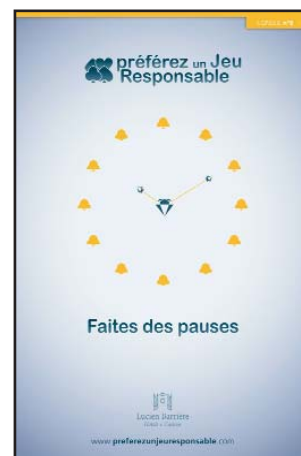
The screenshot shows the homepage of the 'préférez un Jeu Responsable' website. At the top, there is a search bar and a navigation menu. The main content area is divided into four columns. The first column is titled 'CHARTRE DU JEU RESPONSABLE' and lists links like 'Pourquoi ce site?' and 'Des professionnels du jeu s'engagent'. The second column is 'CONSEILS & EVALUATIONS' and includes 'Quel joueur êtes-vous?', 'Evaluer votre budget jeu', and 'Conseils pour un jeu responsable'. The third column is 'CHOISIR & AGIR' with links for 'Se faire aider', 'Limitation volontaire', and 'Choisir l'interdiction'. The fourth column is 'CARTES SUR TABLE' with links for 'Mythes & réalités', 'Témoignages', and 'A lire / A voir'. Below these are three featured content blocks: 'QUEL JOUEUR ETES-VOUS?' with a self-assessment tool, 'EVALUEZ VOTRE BUDGET JEU' with a budget evaluation tool, and 'CONSEILS D'EXPERTS' with expert advice. To the right is 'Le Blog des Psy' with a featured article on gambling addiction. The footer contains contact information and logos for Lucien Barrière Hôtels & Casinos, LE CASINO, and CASINOS DE FRANCE.

E / AN INFORMATION AND PREVENTION CAMPAIGN ABOUT RESPONSIBLE GAMING

An information and prevention campaign is running in the Barrière casinos to heighten general awareness of players throughout visits. The campaign aims to clearly admit the risk of addiction while also showing vulnerable players how to control gambling thanks to a simple and easy-to-follow good behaviour code, based on Public Health recommendations.

The code is based on six clear and concrete messages:

- Talk to our staff
- Make the most of your winnings
- Fix yourself a limit
- Play for pleasure
- Do not borrow
- Take breaks



Moreover, a Responsible Gaming Guide is available in all Barrière casinos.

In addition to advice on responsible gaming, the guide lists the signals pointing to excessive gambling: "I bet large sums that exceed my budget", "When I lose, I play again to win back my loss", etc.

A quiz-test allows players to define player profiles in a few minutes. Risk profile players are guided towards the Group's Responsible Gaming Supervisors and/or to external gambling specialists. The test uses detection tools which have been approved by health specialists around the world.

During 2010, there were 2,100 conversations between the Responsible Gaming Supervisor and a customer at the Group's casinos, which represents excellent on-site commitment to Responsible Gaming!



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Lucien Barrière
Hôtels & Casinos

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