

## Responsible Gaming and Advertising Policy

Version	2.0	Applicability	All
Updated Date	December 2023	Owner	Legal

### 1. Statement Of Policy

Churchill Downs Incorporated (“CDI”) offers gaming and wagering for the entertainment for our guests. CDI recognizes that the products it offers, while a source of entertainment for its guests, may also be a problem for some. In order to promote and support responsible gaming and marketing, CDI maintains a Responsible Gaming Policy (“Policy”) focused on promoting safe and enjoyable wagering experiences and to prevent problem gambling.

CDI and its subsidiaries and affiliates (“CDI Business Units”) are committed to complying with all laws and regulations pertaining to responsible gaming. Each CDI Business Unit shall follow this Policy and may establish a more comprehensive responsible gaming program. Where state requirements differ from this Policy, the more stringent standards and procedures will apply.

### 2. Scope

This Policy applies to “Covered Person(s),” which includes all directors, officers, and employees of CDI and its Business Units.

### 3. Definitions

- A. “Problem Gambling” includes all gambling behavior patterns that compromise, disrupt, or damage personal, family, or vocational pursuits. The symptoms include increasing preoccupation with gambling, a need to bet more money more frequently, restlessness or irritability when attempting to stop, “chasing” losses, and loss of control manifested by continuation of the gambling behavior in spite of mounting, serious, negative consequences. In extreme cases, problem gambling can result in financial ruin, legal problems, loss of career and family, or even suicide.<sup>1</sup>
- B. “Responsible Gaming” is where guests responsibly enjoy gaming as a form of entertainment, while minimizing the potential for risky or problem gambling.<sup>2</sup>

### 4. Promote Responsible Gaming

CDI is committed to promoting responsible gaming and designating assistance to employees and guests who may, or are, dealing with problem gambling. CDI promotes responsible gaming through various methods such as providing a toll-free number for the National Council on Problem Gambling (1-800-GAMBLER), print information and signage to be available and visible on our properties and websites, annual and period responsible gaming training, and ensuring responsible advertising methods and channels.

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<sup>1</sup> For more information on the American Psychiatric Association’s criteria for gambling addiction, please see the DSM 5 at [www.psych.org](http://www.psych.org)

<sup>2</sup> [American Gaming Association \(AGA\) Responsible Gaming Code of Conduct](#)

## 5. Prevent Underage Gambling

CDI makes diligent efforts to prevent underage individuals from participating in any gambling, entering into or loitering in gaming areas, and from gaining access to mobile or online gambling opportunities. CDI communicates the legal age to gamble through messaging as appropriate in its facilities, online platforms, and in gambling promotions, and trains employees in detection of underage persons according to the requirements of the state.

### 5.1. Employees

Employees working in relevant areas will complete training in procedures for the prevention of underage gaming. Training will include the requirement to check identification as required by state regulations or for any person who appears to be under a certain age as determined by the CDI Business Unit.

A list of acceptable forms of valid identifications includes, but is not limited to, the following:

- Driver's License
- Passport
- Military ID
- Other forms of current State or recognized government agency document with photograph and Date of Birth.

Employees will be trained to identify false or fraudulent forms of identification and procedures to respond to presentation of false identification.

### 5.2. Unattended Children

If a child is unattended or appears to be in violation of local curfews and other laws, security or appropriate personnel will be contacted and action will be taken to locate the parent or responsible adult on the premises using methods outlined in the facility's standard operating procedures for security or appropriate personnel.

## 6. Employee Training

CDI will educate new employees on responsible gaming and train and provide refresher training to front line employees. The training program will include the following topics:

- i. Define the characteristics of responsible and problem gambling;
- ii. Learn different gambling behaviors;
- iii. Understand the progression and signs of problem gaming;
- iv. Know what to do when you recognize a problem;
- v. Understand self-exclusion; and
- vi. Assist and refer information, including specific resources and training on how to share information with guests concerning available services.

### 6.1. Responsible Gaming Ambassador

Each Business Unit may identify a Responsible Gaming Ambassador. Ambassadors will be provided with additional training to assist guests who may be dealing with problem gambling. This training takes one step further than the general employee training. While no employee may act as a counselor or therapist, ambassadors will have unique skills to assist guests with necessary resources on responsible gaming.

### 6.2. Employee Assistance Program

CDI provides an Employee Assistance Program ("EAP") for the benefit of employees and their families.

The program offers short-term, confidential counseling from Licensed Professional Counselors for a full range of help for psychological, mental, emotional, and other concerns at no cost to the employee. Employees may seek assistance with gambling or other addictions, stress, family relationships, elder care, childcare, and similar sources of personal concern. In a crisis, emergency help is available 24/7.

CDI publishes information about EAP through annual healthcare enrollment, brochures, a toll-free phone number and online messages that show how to access the EAP services.

## **7. Self-Exclusion**

CDI is committed to complying with all laws and regulations and to provide entertainment in a responsible way. Many of the states where CDI operates offer a voluntary state exclusion option, where the patron may sign up to exclude themselves from gaming establishments on a state-wide basis. In addition to complying with these state exclusion programs, certain CDI Business Units also provide guests with the option to self-exclude at each business unit. CDI Business Units may also choose to honor a patron's exclusion from another jurisdiction.

## **8. Responsible Advertisement**

CDI advertising and marketing complies with all state and federal standards and will not contain images, symbols, celebrity/entertainer endorsements, and/ or language designed to appeal specifically to children and minors. CDI will not feature anyone who is, or appears to be, below the legal age for gambling in a gambling activity. CDI will not knowingly advertise to an audience that is ordinarily expected to be below the legal age to participate in gambling activities. Further, CDI will not directly advertise to customers who have self-excluded.

CDI will not advertise claims or representations that gambling activity will guarantee an individual's social, financial, or personal success. CDI will not suggest any illegal activity of any kind.

## **9. Problem Gambling Awareness Month**

This event is sponsored by the National Council on Problem and Compulsive Gaming and occurs every March. CDI Business Units are challenged to create and execute in a series of awareness raising exercises among employees with a particular focus on prevalence of problem gaming and intervention tools. These exercises consist of activities like quizzes, scenario reaction simulations, and guest speakers. Employees are engaged into these exercises by offering incentives such as swag bags, gift cards, free hot dogs in the TMDR, etc. Each Business Unit's executive management team is fully supportive and engaged in the awareness raising efforts throughout the month via e-mails, speaking engagements, small group pre-shift meetings, social media, and other methods of communication.

## **10. Responsible Gaming Education Month**

Responsible Gaming Education Month is an event sponsored by the American Gaming Association to promote gaming literacy and consumer education, elevate employee training, and advance understanding of responsible gaming. CDI and its Business Units are committed to Responsible Gaming and the opportunity to educate our employees and guests and to advocate for gaming to be conducted safely and for the purpose of entertainment.

## **11. Violations**

Failure to comply with this Policy will result in disciplinary action up to, and including, termination of employment. If a third-party vendor, supplier, or distributor is found to have violated this Policy, CDI will promptly take remedial measure to address the violation, up to and including, termination of the business relationship.

## 12. Record Retention

All records pertaining to Responsible Gaming shall be retained in accordance with both state and federal requirements.

## 13. Contacts and Resources

<p><b>National Council on Problem Gambling</b></p>	<p>Call: 1-800-GAMBLER (426-2537)            Chat: 1800gamblerchat.org            Text: 800GAM</p>
<p><b>Florida – Florida Council on Compulsive Gambling</b></p>	<p>P.O. Box 2309            Sanford, FL 32772            Tel: 888.236.4848            Fax: 407.865.6103            Email: fccg@gamblinghelp.org            Website: www.gamblinghelp.org            Helpline: 888-ADMIT-IT (236-4848)            Text: 888-ADMIT-IT (236-4848)            Live Chat: www.gamblinghelp.org (24/7)</p>
<p><b>Indiana – Indiana Council on Problem Gambling</b></p>	<p>3935 N. Meridian St.            Suite B-1            Indianapolis, IN 46256            Tel: 317.632.1364            Website: www.indianaproblemgambling.org            Helpline: 800-994-8448 or 866-699-4274</p>
<p><b>Iowa – Iowa Gaming Association</b></p>	<p>Iowa Gaming Association            13350 Cedarwood Ave.            Clive, Iowa 50325            Website: iowagaming.org/contact            Helpline: 1-800-BETS-OFF</p>
<p><b>Kentucky – Kentucky Council on Problem Gambling</b></p>	<p>P.O. Box 4595            Frankfort, KY 40604-4595            Tel: 502.223.1823            Website: www.kycpg.org and www.kygamblinghelp.org            Helpline: 1-800-GAMBLER</p>
<p><b>Louisiana – Louisiana Association on Compulsive Gambling</b></p>	<p>1325 Barksdale Blvd Ste 219            Bossier City, LA 71111            Tel: 318.227.0883            Fax: 318.221.0005            Email: lacg@helpforgambling.org            Website: www.helpforgambling.org            Helpline: 877-770-7867</p>
<p><b>Maine – Maine Council on Problem Gambling, Inc.</b></p>	<p>PO Box 128, 4 Water Street            Searsport, ME 04974            Tel: 207-520-0293            Email: info@maineproblemgambling.org            Website: www.maineproblemgambling.org</p>

<b>Maryland – Maryland Council on Problem Gambling</b>	Address: PO Box 31623, Gwynn Oak, MD 21207 Tel: 443-292-2809 Email: MarylandCouncilPG@yahoo.com Website: Marylandproblemgambling.org Helpline: 1-800-522-4700
<b>Mississippi – Mississippi Council on Problem &amp; Compulsive Gambling</b>	141 Executive Drive, Suite 4 Madison, MS 39110 Tel: 601.853.8351 Fax: 601.853.8355 Email: mcpcg@netdoor.com Website: www.msgambler.org Helpline: 888-777-9696
<b>New Hampshire – NH Council on Problem Gambling</b>	100 N. Main St, Suite 400 Concord, NH 03301 Website: info@nhproblemgambling.org Helpline: 1-603-724-1605
<b>Ohio – The Problem Gambling Network of Ohio</b>	355 E Campus View Blvd Ste 285 Columbus, OH 43235 Tel: 614.750.9899 Fax: N/A Email: info@pgnosio.org Website: http://www.pgnosio.org/
<b>Pennsylvania – Council on Compulsive Gambling of Pennsylvania, Inc.</b>	P.O. Box 444 Spring House, PA 19477 Tel: 215.643.4542 Email: josh@pacouncil.com Website: www.pacouncil.com Helpline: 1-800-GAMBLER
<b>Virginia – Virginia Council on Problem Gambling</b>	PO Box 980330 Richmond, VA 23298 Tel: 804.827.0921 Email: info@vcpg.net Website: vcpg.net Helpline: 1-800-522-4700