

## **HRV Race Fields Financial Policy – effective 1<sup>st</sup> September 2017**

The table below summaries the fee structure which HRV introduced on 1 September 2017. The table should be read in conjunction with the current conditions of approval:

	<b>Aggregate Turnover (AV) up to \$100,000 per calendar month</b>	<b>Aggregate Turnover (AT) above \$100,000 per calendar month</b>	<b>Growth Incentive</b>
<b>Pari-mutuel Bets</b>	1.0%	2.5%	If Financial Year 2017/18* pari-mutuel AT exceeds 90% of the Financial Year 2016/17 pari-mutuel AT (the ' <b>pari-mutuel target</b> '), a 0.5% fee discount shall be applied to all turnover in excess of the pari-mutuel target
<b>Fixed Odds Bets</b>	1.0%	2.75%	If Financial Year 2017/18* non-pari-mutuel AT exceeds Financial Year 2016/17* non-pari-mutuel AT by <b>19.0%</b> or where a WSPs total Financial Year 2017/18 non-pari-mutuel AT exceeds \$100m (the ' <b>non-pari-mutuel target</b> '), a 0.75% fee discount shall be applied on all Fixed-Odds AT in excess of the non-pari-mutuel target. (Note: Irrespective of the above, the discount rate will be applied no earlier than 1 January 2018).
<b>Tote Derivative Bets</b>	1.0%	3.25%	If Financial Year 2017/18* non-pari-mutuel AT exceeds Financial Year 2016/17* non-pari-mutuel AT by <b>19.0%</b> or where a WSPs total Financial Year 2017/18* non-pari-mutuel AT exceeds \$100m (the ' <b>non-pari-mutuel target</b> '), a 0.25% fee discount shall be applied on all Tote Derivative AT in excess of the non-pari-mutuel target. (Note: Irrespective of the above, the discount rate will be applied no earlier than 1 January 2018).

- **For the avoidance of doubt where two Wagering Service Providers are the subject of a merger or one Wagering Service Provider is the subject of a takeover by the other Wagering Service Provider the discount rates referred to in the above table shall be applied to the combined aggregate turnover of both Wagering Service Providers for the 2016-17 and the 2017-18 financial years. A financial year is from 1 July to 30 June however the new fees shall apply from 1 September 2017. The growth incentive shall apply to turnover for the financial year.**

### **HRV Minimum Bet Liability Limit Policy – effective 1<sup>st</sup> January 2018**

*Approved WSPs will be required to accept a **fixed odds win bet** at odds which are publicly displayed by the WSP for any Victorian harness race to the maximum amount specified as follows:*

<b>Race Type</b>	<b>Stand To Lose (Fixed Odds Win only)</b>
Victorian Metropolitan Meeting (Friday, Saturday or Sunday at Melton)	\$1,000
Victorian Country Meeting	\$500

An approved WSP must not do any act or refuse to do any act to avoid complying with the bet limits, including but not limited to:

1. Refusing to accept a fixed odds win bet
2. Closing a person's account
3. Refusing to open a person's account
4. Placing any restrictions on a person's account in relation to Victorian harness racing product
5. Refusing to lay fixed odds to any person when those fixed odds are publicly displayed
6. Laying lesser odds to a person than those publicly displayed
7. Any other act or refusal to do an act in order to avoid these provisions

#### **Exclusions:**

An approved WSP will not be required to comply with the MBL policy if:

1. The customer is not domiciled in Australia
2. The bet is a betting transaction on a betting exchange
3. The customer has not provided the approved WSP with sufficient funds to pay for the bet
4. The bet is placed more than an hour prior to the scheduled start time of the opening race of the meeting / race program, or after the scheduled start time of the race, as stipulated in official racing publications

5. The bet forms part of a multi bet, exotics bet, futures bet or is a place bet
6. The bet is a retail cash betting transaction
7. An approved WSP reasonably suspects the customer placing the bet is not the beneficial owner of the bet or the account is being used in violation of the WSPs account terms and conditions, where the suspicion can be reasonably validated by the WSP through public records, IP address tracking, unique device tracking, etc
8. The person is acting as agent or nominee for a third party and the person placing the bet will not be beneficially entitled to the whole of the proceeds of the Relevant Fixed Odds Bet with the Approved WSP
9. The person is on a relevant gambling self-exclusion register
10. The customer has not yet met the required account identification and verification processes and thus the approved WSP cannot meet their obligations under The Anti-Money Laundering and Counter-Terrorism Finance Act 2006 (Cth) or any responsible gambling legislation
11. An approved WSP has previously closed the customer's account because:
  - i. the customer engaged in activity which breached a material condition of the agreement with the WSP, unless the dominant purpose of such condition was to allow the WSP to avoid complying with the MBL conditions; or
  - ii. there were other reasons that in the WSPs assessment, acting reasonably, raised material integrity concerns.
12. The customer has been warned off or disqualified, engaged in fraudulent activity or there are other reasons that in HRV's assessment, acting reasonably, raises material integrity concerns
13. There has been an official price fluctuation or the WSPs own price fluctuation has changed
14. An approved WSP has already accepted a fixed odds win bet, or number of fixed odds win bets from the person on that race, up to the aggregate amount of the MBL
15. The customer placing the bet is, or is associated with, an employee of a licensed Australian WSP and there is a reasonably held belief that the bet is based on betting information (including but not limited to betting trends and bets placed with that licensed Australian WSP) that is not publicly available

16. The customer has been restricted to betting via a specified platform (e.g. telephone) arising from reasonably held concerns by the WSP as to robotic or systematic use via other platforms / channels
17. The bet is contrary to the Australian Harness Racing Rules and the Victorian Local Rules and Betting Rules and/or relevant laws
18. The situation where there are systematic multiple identical (or similar) bets from related / connected parties or from the same IP address
19. Where a customer is betting from, or a bet is received from, a proxy server
20. The bet was a promotional bet such as a bonus bet or free bet, where the customer has not provided payment for the stake
21. HRV publishes other exclusions or changes to the MBL framework on its website which will be amended as required
22. The customer is suspected of unauthorised scraping of a WSP's website

### **Complaints Resolution Process**

Customers / Punters who believe that a wagering operator has wrongfully refused their bet or excluded them in contravention of the minimum bet limit condition should contact the wagering operator to ascertain the reason for the refusal or exclusion.

If the punter remains unsatisfied with the reason provided by the wagering operator, they will be directed to lodge a formal complaint and details of the bet with Harness Racing Victoria via an online form within 14 days of the refused bet.

Complaints will only be accepted and investigated following submission of a fully completed complaints form.

### **HRV Publishing Time for Fixed Odds**

Effective 1st January 2018, approved WSPs will be required to publish fixed odds for Victorian harness race fields no later than 1 hour prior to each applicable race.

## **Minimum Bet Liability Limits - Customer FAQs**

### **1. When does the Minimum Bet Liability Limit policy (MBL) commence?**

1<sup>st</sup> January 2018.

### **2. Which wagering operators must comply with the conditions?**

All approved off-course Australian wagering operators who are approved by Harness Racing Victoria to use Victorian harness race field information

### **3. What races does the policy apply to?**

The MBL policy applies to all Victorian Harness races from January 1<sup>st</sup> 2018

### **4. What are the liability limits?**

<b>Race Type</b>	<b>Stand To Lose (Fixed Odds Win only)</b>
Victorian Metropolitan Meeting (Friday, Saturday or Sunday at Melton)	\$1,000
Victorian Country Meeting	\$500

### **5. What bet types does the policy apply to?**

The MBL applies to fixed odds win bets placed on Victorian harness races. The MBL does not apply to place bets, multi bets, pari-mutuel bets, tote-derivative bets or bets placed with a betting exchange.

Additionally there is no obligation for the WSP to comply in respect to free bets, bonus bets or other promotions.

### **6. Does the MBL apply to Victorian on-course bookmakers?**

This MBL policy does not apply to on-course bookmakers, who are governed by the Victorian Local Rules <http://www.harness.org.au/rules/vic-vlr-2016.pdf>

These local rules will be reviewed to align the liability limits with the MBL.

### **7. Does the MBL apply to cash bets placed in a retail venue?**

No, the MBL applies to retail, internet and telephone bets placed with WSPs by ID verified account customers. Cash bets placed with retail outlets, including interstate and Victorian TAB agencies, hotels, clubs and pubs are exempt.

### **8. Can I have multiple bets in the one race to win the amount specified in the MBL?**

An approved Wagering Service Provider (WSP) is obligated to lay a bet to the liability limit once per customer per race. Any additional bets placed in the specified race are not subject to the MBL policy.

**9. Can I attempt to bet to more than the limit?**

An approved WSP is only obligated to lay a bet up to the liability limit specified, but are not limited by this and may choose to accept a greater liability than that specified.

**10. What price does a WSP have to bet each punter?**

All punters are entitled to the price publicly displayed in the wagering operator's latest betting market on their website or app. The only time a changed price can be offered after a punter places a bet is if another bet has been layed at the original price and the wagering operator is adjusting the price, which will flow through to their website or app. Time log records can be checked to confirm this process.

**11. Can a WSP close an account or refuse to open an account?**

A WSP may close an account or refuse to open an account for legitimate reasons, including suspicion of bowler accounts (persons betting on behalf of other persons), fraudulent activity, money-laundering, responsible gambling practices and other integrity related reasons such as the punter being warned off or disqualified.