

Ms. Jenny Cranston  
Chair  
Tasmanian Liquor and Gaming Commission

Dear Ms Cranston

I am writing in relation to the Commission's consultation on facial recognition technology and player card (cashless) gambling.

Aristocrat Leisure Limited ([www.aristocrat.com](http://www.aristocrat.com)) is one of the world's leading gaming technology companies. We are top-20 listed ASX company headquartered in Australia, and the vast majority of our shareholders are Australians. Our gaming technology in clubs, hotels and casinos helps generate economic activity and sustains thousands of local jobs in the tourism and hospitality industries.

We understand and support the Tasmanian Government's investigation of these technologies and believe cashless solutions can be used to address responsible gameplay (RG), money laundering and compliance concerns held by stakeholders. In our view, encouraging innovation and bringing forward new technology is essential to ensuring the long-term sustainability of the industry in the Tasmanian (and Australian) market.

Our company has a particular interest in your investigation of cashless technology and is happy to share experience from solution deployments in the US, and the upcoming Australian-first trial of EGM digital wallet technology in NSW. At this early stage of consultation, we would like to provide an overview of the trial, to be conducted in Newcastle at the Wests New Lambton club. We note there are later stages of consultation planned and are happy to assist the Commission on request.

#### **DIGITAL PAYMENTS IN AUSTRALIA**

Consumers increasingly prefer digital payment over cash for most goods and services and the use of digital wallets is commonplace. Digital wallets are commonly used to store electronic or virtual copies of bank cards, loyalty cards, identification cards and airline boarding passes. Convenience, security, and hygiene considerations mean that consumers expect to be able to use cashless functionality when they transact. However, EGM play remains an exception, with cash still required to play. Enabling digital payment for EGM play will allow a complete cashless experience for venue patrons and at the same time address stakeholder concerns around RG, money laundering and venue compliance.

#### **THE TRIAL**

The NSW Government established a Technology Working Group (TWG) to assess available digital payment technologies and draw up plans for trialing solutions in a controlled, real-world environment. Critically, new RG functionality needed to be designed and tested to ensure that digital payment did not exacerbate gambling harm. The trial will allow digital payment solutions to be assessed by an independent researcher as passing a public net-benefit test, and ultimately being fit for approval by the regulator.

#### **THE SOLUTION - PRIME MOBILE**

PRIME Mobile has the capability to deliver a complete digital experience for venue patrons, by providing the ability to pay for products and services including EGM play using a digital wallet instead of cash. The mobile application is integrated with Aristocrat's S7000 gaming management system. Importantly, the solution provides new and sophisticated, optional RG tools to help patrons manage their play.

## **PRIME MOBILE'S RESPONSIBLE GAMEPLAY FEATURES**

Aristocrat is deeply committed to being a leader in RG and our vision is for a vibrant and sustainable industry that is welcome in the community over the long term. PRIME Mobile introduces sophisticated, optional new RG functionality. It allows players to set gaming thresholds and determine the venue response for when they are reached. Players can make choices on session length, frequency of play, amount spent or won, total bets and bet size and staff intervention can be enabled. Messages and push notifications are sent to the patron via the venue's gaming management system. Credit cannot be used, there are limits on funds transfers to the player's digital wallet and topping-up on the gaming floor is not permitted. Importantly, players can self-exclude using the application. PRIME Mobile takes its place in Aristocrat's portfolio of RG tools and options for Australian venues and players that includes Flexiplay and education resources.

Aristocrat would be happy to demonstrate its solution or provide further information on request.

If you have any questions about our submission, please contact me.

ANTHONY BALL

5 May 2022

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ANZ/APAC

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