

# Progressive Discipline Policy

## Compliance Monitoring

AGLC will track incidents of non-compliance with policy or procedure through Compliance Monitoring programs conducted by auditors. Substantiated Complaints received from consumers against the Lottery Retailer or employees may also be included as valid incidences of non-compliance.



For the purposes of this policy, “Lottery Retailer” refers to a person contracted by the Lottery to sell lottery tickets and provide lottery services at a retail location or a person who is an employee of a retail location and is authorized to operate lottery terminal or is involved in the handling, selling and/or validation of lottery products.

## Progressive Discipline

The Progressive Discipline policy is based on violations occurring during any consecutive 12-month period. The schedule of violations below outlines the progressive disciplinary steps to be taken by the Lottery upon confirmed incidents within a 12-month period.

## Objective

The objective of a Progressive Discipline is to maintain the integrity and security of lottery products within Western Canada Lottery Corporation’s jurisdiction. A number of policies and practices have been established to ensure that appropriate measures are being taken around the operation of lotteries at Retail outlets. These measures will instill a level of consumer confidence and strengthen the reputation of the lottery and its retailers.

Violation	1 1st Offence (WITHIN ANY 12-MONTH PERIOD)	2 2nd Offence (WITHIN ANY 12-MONTH PERIOD)	3 3rd Offence (WITHIN ANY 12-MONTH PERIOD)	4 4th Offence (WITHIN ANY 12-MONTH PERIOD)
<b>Fraud/Theft</b>	<b>OWNER/RETAILER:</b> Termination of Lottery Agreement <b>EMPLOYEE OR CORPORATE STORE MANAGER:</b> Termination of Lottery Agreement unless retailer demonstrates that employee no longer has access to or sells lottery products			
<b>Conduct contrary to public image of WCLC or AGLC</b>	Warning Letter	Warning Letter	Warning Letter	Repeated violations could result in Suspension or Termination of Agreement
<b>Administrative issues</b>	Call to Location	Warning Letter or Call	Warning Letter or Call	Repeated violations could result in Suspension or Termination of Agreement
<b>Sales, validation or prize payment issues not related to fraud/theft</b> <ul style="list-style-type: none"> <li>• Tore customer’s ticket.</li> <li>• Did not return ticket – winning or non-winning – in one piece.</li> <li>• Did not return Validation Slip</li> <li>• Did not check for signature on ticket.</li> <li>• Retailer paid winning ticket over \$1,000 and claimed on behalf of customer.</li> </ul>	Warning Letter and Training	Warning Letter and Training	Mandatory Training Session minimum or up to Suspension of Lottery Terminal for a maximum of 3 days	Suspension of Lottery Terminal for 3-7 days or up to Termination of Lottery Agreement
<b>Selling to Minors</b>	Warning Letter and Training	Suspended immediately for minimum of 30 days	Termination of the Lottery Agreement	
<b>ID Under 25 Years Old</b>	Letter to Lottery Agreement signatory. Follow up by AGLC Representative.	Letter to Lottery Agreement signatory. Follow up by Supervisor/Manager with requirement for mandatory Training and advising of 2-day Suspension on next violation.	Letter to Lottery Agreement signatory with 2-day Suspension. Follow up by Manager advising of further Suspension or Termination on next violation.	Letter to Lottery Agreement signatory with 7-day Suspension or Terminate Agreement