

# THAMES HOSPICE LOTTERIES POLICY – LOTTERY KEY EVENTS

This policy should be read in conjunction with the Thames Hospice suite of Lottery and Raffle Policies

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Campaigns Manager	September 2025	One	October 2025

As a licensed society lottery operator, Thames Hospice is required to adhere to statutory reporting requirements set by the Gambling Commission. Part of these includes reporting Key Events as defined by the Gambling Commission. They are events that could have a significant impact on the nature or structure of our business.

Key Events are as follows:

## Operator status

Key event 1:

If a company (or group company) is presented with a petition for winding up, or a winding up order has been made, or it enters administration or receivership. Or, if a person in a key position in a company, or a relevant shareholder, has entered into an Individual Voluntary Agreement (IVA), or is made bankrupt or sequestration of their estate is awarded.

## Relevant persons and positions

Key event 2:

If any shareholder in your company (or holding company) holds 3% or more of the issued share capital of the company.

Key event 3:

If your company (or a group company) takes a loan from any person not authorised by the Financial Conduct Authority.

Key event 4:

Any changes to appointments of persons in 'key positions' in your company.

## Financial events

Key event 5:

Any material change in your business's banking arrangements.

Key event 6:

Any breach of a covenant given to a bank or other lender to your business.

Key event 7:

Any default by your company (or a group company) in making repayments on a loan.

Key event 8:

Any change in your company's arrangements for accepting payment from customers (e.g. change of payment processor).

Legal or regulatory proceedings or reports

Key event 9:

If an application for a gambling licence or permission made by your company (or any group company) in another jurisdiction is granted, withdrawn, or refused.

Key event 10:

Any investigation by a professional, statutory, regulatory or government body into your company's activities, or person in a 'key position', that could result in a sanction or penalty, which might cause us to question the company's continued suitability to hold a licence from us.

Key event 11:

Any criminal investigation, in any jurisdiction, involving your company, or a person in a 'key position' in the company, which might cause us to question if your business's measures to keep crime out of gambling had failed.

Key event 12:

The referral to your company's Board (or audit and risk function) of material concerns raised by a third party (e.g. auditor), in any jurisdiction.

Key event 13:

A disciplinary sanction for gross misconduct, including dismissal, against the holder of a personal licence or a person occupying a qualifying position.

Key event 14:

Any material litigation against your company (or a group company), in any jurisdiction.

Key event 15:

The unique reference numbers of any suspicious activity reports issued by the United Kingdom Financial Intelligence Unit (UKFIU) ([opens in new tab](#)).

**Gambling facilities**

Key event 16:

Any security breach that adversely affects the confidentiality of customer data; or prevents account access for longer than 12 hours.

Key event 17:

Any gaming system fault (opens in a new tab) which has resulted in under or overpayments to a player.

Key event 18: Changes to trading on website domains (including mobile sites and applications) or broadcast media.