

CHOCTAW NATION GAMING COMMISSION

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Vendor Key Control Standard Operating Procedures

INTRODUCTION

Implementation Date: January 1, 2018

The following manual is compiled to assist in daily operational functions and provide standard policies and procedures that must be adhered to in order for Choctaw Casinos to maintain compliance with various regulations, set forth by the Choctaw Nation Gaming Commission and the National Indian Gaming Commission (NIGC).

REFERENCE DOCUMENTATION: Choctaw Nation Gaming Commission (CNGC)
Tribal Internal Control Standards (TICS)
National Indian Gaming Commission (NIGC)
Minimum Internal Control Standards (MICS)

Introductory Statement

This manual is intended to provide each vendor with an understanding of the Gaming Key policies and procedures set forth by the Choctaw Nation Gaming Commission and Choctaw Casinos. It is the responsibility of each vendor to disseminate the contents of this policy and procedure manual to its employees. It shall further be each vendor's responsibility to update their employees with any Gaming Key policy and procedure changes, and/or modifications developed and approved by the Choctaw Nation Gaming Commission.

Terms and Definitions

- CHOCTAW CASINO KEY CONTROL ADMINISTATOR – the caretaker of the key boxes (Maintenance, Updates, Key Replacement, etc...).
- KEY RINGS – metal ring used to hold the casino keys onto the SMART KEY and is locked with the hub.
- HUB – plastic lock with a security code that is assigned to a key ring.
- SMART KEY – plastic key that is used to lock the different sets of key rings into the key boxes. The SMART KEY is programmed through the database to determine the location of the key ring in the key box.
- SENSITIVE KEYS – are keys that allow access to restricted areas and pieces of equipment and must remain inside of the casino at all times.
- MORSE WATCHMANS KEY CONTROL CABINET – The computerized key boxes.

Amended October 11, 2017

TYPE OF KEYS

Each Choctaw Casino Key Control Administrator (key box custodian) shall maintain a key access list noting which keys vendors may access.

Keys which require issuance under Security or Management escort shall be identified as such on the sensitive key access list and the key log entries shall indicate who originally escorted the key. All sets of keys will have a time zone.

Sensitive Keys

Sensitive keys are keys that allow access to restricted areas and pieces of equipment and must remain inside of the casino at all times.

At a minimum, the following keys shall be considered sensitive keys

- **Central Processing Unit Key (Logic Key) (Dual Access) (4 Hours time limit)**
- **Main Door Key (13 Hours)**
- **Bill Validator Door and Box Release Key (2 hours time limit and separate from the Content key)**
- **Belly Glass Key (13 Hours)**
- **Progressive Controller and Compartment Keys (13 Hours)**

Key Access Request

The Key Control Administrator will issue key access to all new vendors and/or site transfer vendors. The Key Control Administrator will issue or change the key status for the vendor once requested by the vendor and approved by the Choctaw Nation Gaming Commission. Please send all request to OC.Dunn@choctawcasinos.com.

Sensitive keys shall not be passed on to another vendor employee (or casino employee). If a vendor employee removes the keys, that employee must return the keys within the allotted time period.

Lost or Missing Keys

Lost or missing keys present an immediate security risk to the entire casino operations and must be *immediately* reported (along with the circumstances related to the loss or theft) to Surveillance, Security, the Manager on Duty and the Choctaw Casino Key Control Administrator. The Manager on Duty or Choctaw Casino Key Control Administrator will notify the Compliance Department which will notify the Choctaw Nation Gaming Commission.

- All efforts must be taken by the vendor employee and Choctaw Casino Key Control Administrator to find the keys.
- The missing keys must be logged in the manual log located at the security booth.
- The manual log will indicate the name of the vendor employee who had them in their possession, date and time, and explain the activities leading up to the lost or missing keys.

NOTE: If it is determined that a “re-key” is required the vendor shall be responsible for the cost of the “re-key”.

Violations of Gaming Key Policies and Procedures

The following actions pose security risks to casino operation and shall be considered violations of this policy:

Type A Offenses:

1. **Overdue Keys** – Any key that is not returned within the specified time frame noted on each key box. (Exceptions are made **ONLY** during game changes and installs.)
2. **Inconsistent Key Return** – Any key that is not returned by the original user, unless it is an emergency return. (For example, if the associate has to leave work unexpectedly for a personal emergency.)

Type B Offenses:

1. **Leaving Casino with Keys** – Any key that is removed from the inside of the casino.
2. **Lost or Missing Keys** – Any key that the user does not have actual physical control of or cannot produce upon request.

Each incident will be reviewed and all elements will be taken into consideration before a vendor or vendor employee is subject to disciplinary action. The level of disciplinary action shall be directly associated with the type of offense committed. An associate's first Type A offense shall result in a Level 1 action with single step level progression for any subsequent offense. An associate's first Type B offense shall result in a Level 2 action with single step level progression for any subsequent offense. Consecutive violations shall be evaluated in six (6) month intervals from the date of the most recent violation.

Disciplinary Action Guidelines for Vendors

Level 1	Written warning
Level 2	Notice of Violation
Level 3	3 day suspension of vendor employee gaming license
Level 4	\$500 fine
Level 5	\$1000 - \$25,000 fine

General rules are posted at each key box.