



Responsible Advertising and Marketing Policy

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Approved by the Board

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1 POLICY STATEMENT

Playtech believes that safer gambling is a critical part of the long-term success of its B2B and B2C gambling operations as well as the sustainability of the industry as whole. Playtech believes that the gambling industry can provide a safe and responsible form of entertainment. While the majority of people who gamble do so in a responsible and safe manner, we recognise that there are risks involved whereby gambling can cause harm.

As a leading, global technology supplier to the sector, we recognise that we have an important role to play in developing technology solutions to address safer gambling challenges and raise standards across the industry. We believe that innovation in safer gambling is critical for keeping pace with regulatory, consumer and societal expectations to deliver a positive, safer online customer experience that people can trust. Innovation is critical, as we need to keep pace with expectations, reduce risk, maintain trust with our stakeholders and continue to be a viable business in the long term.

This is why Playtech has made safer gambling a core part of its long-term sustainability strategy. We have set out our ambition to be a trusted, global leader in safer products, data analytics and player engagement solutions to raise industry standards. Our commitments include:

- Increasing uptake of safer gambling technology, tools and solutions;
- Harnessing investment in R&D to advance the next generation of safer solutions and features, including responsible game design; and
- Strengthening safer gambling standards and technology across our operations.

In addition, this is underpinned by our commitment to adhering to safer gambling regulatory and licensing requirements in the countries in which we operate. Playtech is a proud signatory to the Betting and Gaming Council ('BGC') industry Safer Gambling Commitments, which aim to deliver long-term and fundamental change to how gambling companies empower, protect and support customers. The commitments cover 22 actions across five core areas, including:

- Preventing underage gambling and protecting young people.
- Increasing support for treatment of gambling harm.
- Strengthening and expanding codes of practices for advertising and marketing.
- Protecting and empowering customers (through product design and customer engagement).
- Promoting a culture of safer gambling.
- The Policy sets out standards for responsible marketing, advertising and sponsorship - online and offline as well as other marketing communication activities. This Policy aims to support our commitment to Strengthening and expanding codes of practices for advertising and marketing as compliance with our responsible business practices as well as regulatory requirements.

2 POLICY APPLICATION

This Policy applies to employees of Playtech Plc and its gambling-related subsidiaries where Playtech holds the operating licence ('Playtech Group'). 'Playtech' is used in this document to mean any entity in the Playtech Group.

This Policy applies to all commercial communications under the Playtech Plc companies relating to interests operated by subsidiaries of Playtech plc either directly or through affiliates, agents, partners and related companies.

Playtech companies will share this Policy with employees, contractors, affiliates and partners who are involved with marketing and advertising activities in any business-to-consumer operations (B2C). This Policy aims to support compliance with our responsible business practices as well as regulatory requirements including:

- Where local responsible advertising and marketing laws and regulations apply in any country in which Playtech operates, those laws and regulations must be followed in addition to the requirements of this Policy. If any such local laws are not as strict as the terms of this Policy (including the laws and regulations referenced in it), then the terms of this Policy must be applied to the extent permitted by local law.
- Any breach of this Policy may result in disciplinary action. This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time.

2.1 POLICY OVERSIGHT

Playtech has appointed a member of the Board of Directors and of its senior management to oversee this Policy. Playtech's Risk and Compliance Committee has overall responsibility for ensuring this Policy complies with Playtech's legal and ethical obligations, and that all those under its control comply with the Policy. The Risk and Compliance Committee is also responsible for approving this Policy, monitoring its effectiveness, raising risks to the Board of Directors and ensuring that appropriate actions are taken to mitigate such risks.

The Group Vice President of Marketing has responsibility for ensuring that B2B marketing, advertising and corporate sponsorship practices adhere to this policy and for monitoring the effectiveness of this policy.

The Corporate Affairs Director is responsible for oversight and monitoring for implementation as it relates to general communications, media, website, social media.

At the operational level, each relevant division is responsible for transposing and aligning this policy into operational procedures and overseeing the implementation, monitoring and effectiveness of those procedures. In addition, they are responsible for ensuring relevant staff are aware, trained and adhering to operational procedures. This includes content studios, content divisions (e.g. Live) and B2C operations.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to Compliance.

2.2 TRAINING

Employees must be aware of their obligations and responsibilities relating to safer gambling. This information is delivered to all employees as part of induction and annual compliance training.

Employees in Marketing and advertising roles will receive specific training on their roles and responsibilities with respect to compliance with applicable advertising and marketing policy.

3 GUIDING PRINCIPLES

As part of our commitment to responsible advertising and marketing guidelines, we are committed to ensuring that all advertising and marketing communications will:

- Be legal and comply with all legislative and regulatory requirements including ASA CAP and BCAP Codes, IGRG, LCCP and relevant Industry voluntary codes.
- Consider customer risk profiles when deciding on the type and frequency of marketing communications in B2C operations;
- Be truthful and not mislead consumers through omission or misleading statements such as 'free bet';
- Advertise and market products fairly and clearly;
- Ensure that promotions and terms and conditions are transparent, visible and clear to players and no more than one click away from the advertisement;
- Ensure care is taken into not exploiting children and other vulnerable people in relation to gambling activity – including exploiting the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons;
- Prevent underage appeal (appeal to under 18s) especially using advertising methods and content that could reflect being associated with youth culture;
- Promote responsibility messages and links; including a message with 18+ and/or relevant legal age restrictions as well as links to signposting to organisations with information about safer gambling such as www.gambleaware.co.uk;
- Avoid portraying, condoning or encouraging gambling behaviour that is socially irresponsible that could lead to financial, social or emotional harm – such as promotion of solitary gambling, promotion of gambling as a solution to financial issues, an alternative to employment or an option to achieve financial security;
- Be mindful not to portray gambling in a context of toughness or link to resilience or recklessness;
- Be mindful of sensitives relating to local cultural values, gender, race, sexual orientation and religion;
- Not employ themes that link gambling to seduction, sexual success or enhanced attractiveness;
- Avoid the use of aggressive advertising methods;
- Not mislead consumers by exaggerating the capability or performance of a product; and
- Must hold documentary evidence to prove claims that consumers are likely to regard as objective and that are capable of objective substantiation.

4 SAFER GAMBLING MESSAGING

- Responsibility messages or icon must be included in all communications and be visible and clear to players.
- Include information on help lines on gambling related problems, where the Player or relatives can seek help.

- Include the 18+ or any legal age limit applicable symbol.
- Link to the relevant responsible gambling website (e.g. www.gambleaware.co.uk for the UK).
- Include Terms & Conditions (T&Cs) apply, where applicable.
- Include Wagering requirements, if applicable.
- Comply with local requirements which will differ according to local licence (i.e. the inclusion of "significant terms" in the UK).

5 PROTECTING YOUNG PEOPLE

All marketing and Advertising must prevent underage appeal and specifically:

- May not be directed at and/or visible to persons under 18.
- May not involve paid actors, athletes, or models under the age of 25. Must not include anyone appears to be, under 25.
- Must use due sense of responsibility with any advertisements involving the use of characters such as super heroes and celebrities that are popular with children.
- Take reasonable steps to prevent under-18s from viewing ads with cartoons or superheroes.
- Advertising also must not:
 - Portray, condone or encourage gambling behaviour that is socially irresponsible that could lead to financial, social or emotional harm;
 - Allude that gambling could be a solution to financial issues, an alternative to employment or an option to achieve financial security;
 - Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons;
 - Link gambling to seduction, sexual success or enhanced attractiveness.
- In line with new industry guidance, those involved with marketing will take all practical steps to protect young people from accessing advertisements and promotions.
- B2C and Product marketing leads will implement +25 age-targeting in social media and "Pay Per Click" advertising where platform facilities permit, to increase confidence in the social media platform's own age-gating, which is currently based on self-certified data and relies on the honesty of the user;
- Relevant leads will use the industry (BGC) approved common list of industry negative search terms (extended to affiliates) to be shared with search engines, along with a list of sites for suppression for the purposes of de-targeting in display so that advertising does not appear on sites with content that could have particular appeal to under 18s or vulnerable people, all frequently reviewed, updated and shared on an on-going basis;
- Relevant leads will implement consistent voluntary age-gating on YouTube channels and content.

6 SOCIAL MEDIA

- Any part of Playtech who is communicating via social media must comply with the company's Group Social Media guidelines.

- When working with influencers, brand ambassadors, streamers, podcasts, compliance with the requirements this Policy must be maintained - irrespectively of whether the company is creator and sender of advertising.
- Social media includes but it is not limited to Facebook, YouTube, Twitter, Instagram, Twitch.
- Paid-marketing must be clearly labelled when produced in collaboration with influencers, bloggers and when purchasing editorial content.
- Brand and/or corporate profiles and pages on social media should clearly state the legal age limit for gambling, as well as the responsible gambling messaging.
- Where technically feasible, profiles and pages on social media should be age restricted, so they can only be accessed by those who declare they are over the legal age limit for gambling (age-gating).
- Profiles and pages on social media should be verified by an "official profile" badge or statement, so users are aware that they are the official brand pages.
- To avoid marketing targeting Minors, marketing leads must use the available data tools when advertising on social media, such as age-screening tools or tools to identify age-restricted content. Marketing leads should use customer data to de-target paid-for ads from vulnerable groups across social media platforms, and work with the platforms to identify ways to do this more easily and effectively.

For more information on social media policy and guidelines, please refer to the Group Social Media guidelines. These guidelines are defined, managed and monitored by Group Corporate Affairs.

7 TELEVISION

- Supers (including significant terms) must be displayed in accordance with Clearcasts Duration of Hold Calculator (<http://doh.clearcast.co.uk/>)
- No TV advertising on sign-up offers (free bets and free money) before 9pm.
- For television advertising, www.gambleaware.co.uk (or equivalent safer gambling message) must remain on the screen for at least 10% of the advert's length.
- Responsibility messages should be included in all broadcast media e.g. Please play responsibly.

8 RADIO

For radio advertising, 'please play/gamble responsibly' (or equivalent safer gambling message) or www.gambleaware.co.uk must be referenced.

9 PRINT ADVERTISEMENTS

- Must carry clearly either a '18+' symbol, or a 'no under 18s' type of message or equivalent for the legal age in the relevant question.
- In the UK, clearly show a www.gambleaware.co.uk address.
- Responsible gambling messages should be clearly legible in proportion to the advertising script and should be a minimum of 100px across.

10 DIGITAL MEDIA

- All content on Playtech controlled (owned or managed) digital platforms should be compliant with this Policy.
- All websites controlled by Playtech companies must show a link to their license and a link to www.gambleaware.co.uk.

11 DIRECT COMMUNICATIONS

- Playtech companies must receive specific consumer consent prior to delivering marketing communications.
- Playtech companies may not direct communications to persons under 18 or legal age in the market in question.
- All direct marketing communications and advertising should adhere to data management and privacy processes.
- Playtech companies should provide a clear and transparent mechanism for consumers to opt-out of receiving direct commercial communication.
- Ensure all marketing messages include the name and address of the sender.
- Ensure that recipients have consented to receiving marketing messages of this type.
- Take steps to ensure that adequate consent from individuals has been obtained when buying-in or renting marketing lists, and that this is sufficiently recent.
- Check boxes for receipt of marketing must not be pre-checked.
- The customer must take the action to check the box themselves.
- Allow recipients of marketing messages to reply directly to the message in order to opt-out, or, in the case of SMS, provide a clear and operational short code which they can use to do so.
- If a recipient objects to or opts-out of marketing, add them to a 'do not contact' or suppression list and do not send any further messages. Cross-check any future marketing lists against this list.

12 AFFILIATES

- When using affiliates, operations must have effective systems and controls for overseeing affiliates and ensuring they are complying with regulatory and licensing requirements.
- All Affiliates must sign adhere to this Policy, which must be included in any contract that Playtech signs with affiliates.
- In B2C, Head of the Operational Compliance Team is responsible for working with the VP Marketing to ensure affiliates receive a copy of this Policy and relevant industry codes of conduct.
- For Product Marketing, the VP of Marketing is responsible for ensuring that B2B affiliates receive a copy of this Policy as part of ongoing communications.

- Marketing leads are required to ensure that contracts with marketing affiliates clearly set out the requirements for compliance and the consequences of failing to do so.
- Ensure other appropriate safeguards are in place to ensure marketing affiliates' practices are compliant.
- Follow up on any complaints in relation to the sending of spam by marketing affiliates and take appropriate action with the relevant affiliate.

13 SPONSORSHIP

- Any sponsorship agreements should be discussed, reviewed and approved in writing by the VP of Marketing and Head of Marketing Communications and Sponsorship.
- This applies to any sponsored event material carrying company or brand logos, for the duration of the sponsorship agreement.
- Sponsorship products should not be of appeal to persons under the legal gambling age (e.g. children's toys) including cartoons that would have particular appeal to children).
- General sport sponsorships must be approved by VP of Marketing and Head of Sponsorship.

14 RESPONSIBLE ADVERTISING AND MARKETING IN B2C OPERATIONS

In divisions where Playtech is operating B2C operations and holds an operating license, the relevant marketing lead in those divisions alongside the relevant Head of Compliance are responsible for ensuring that robust procedures and management controls are in place to ensure the operations are complying with all relevant marketing and advertising regulations and divisional procedures.

14.1 TERMS AND CONDITIONS

Always have the significant terms and conditions directly under or in a promotion/bonus/marketing for both B2C and Product marketing. These should cover:

- WHO can get the promotion/bonus etc.?
- WHAT needs to be done i.e.: qualification, wagering requirements, must deposit etc.?
- WHERE the promotion/bonus can be redeemed e.g. in selected rooms/games.?
- WHEN the promotion starts and ends or the draw takes place?

14.2 BONUSES PROMOTIONS AND REWARDS

- Bonuses should never be offered to players whose accounts are closed due to problem gambling concerns or whose accounts are subject to AML requests and have not yet provided the necessary evidence.
- Offers must be clearly set out and readily accessible.
- Must comply with advertising codes (i.e. CAP, BCAP, IGRG and LCCP).
- Incentives should be proportionate to the type and level of customer's gambling.

- Neither the receipt, nor the value or amount of the offer can be:
 - Dependent on the customer playing for a predetermined length of time or frequency or Altered or increased if the qualifying activity or spend is reached within a shorter time frame.
 - All banners that have ANY promotion/bonus offer MUST contain 'significant terms and conditions' (STs) detailing significant elements of the promotion/bonus. If the offer has wagering requirements, then this must be included within the STs.
 - Full terms and conditions MUST appear under the promotion in full and be one click away from promotional banners.
 - Significant terms and conditions must appear with sufficient prominence in the advert itself.
 - If an email contains an offer/bonus, then the 4-5 material terms and conditions must appear in full at the bottom of the email itself; the standard terms must be displayed below the promotional banner.
 - A link directly to the promotion's terms and conditions must then be after this.
 - 'JOIN NOW' button- cannot alternate between JOIN NOW and an offer if this leads to the registration page.
 - All banners must link directly to the terms and conditions of the promotion/bonus.
 - All banners must be clickable.
 - Offers and freebets must not be displayed on self-exclusion or responsible gambling pages.
- Marketing offers (including anything noted as 'free') must not amount to or involve misleading actions or omissions and must make clear the extent of the commitment the consumer must make to take advantage of a 'free offer'.
- Marketing communications must not describe a product as "free", "gratis", "without charge" or similar if the consumer has to pay anything other than the unavoidable cost of responding and collecting or paying for delivery of the item.
- Free bets or bonuses (or similar).
- Must state significant limitations and qualifications (qualification may clarify, but not CONTRADICT).
- Where limited by space, as much info about significant conditions as possible. Where not possible, ad must direct consumers clearly to an easily accessible alternative where terms are prominently stated e.g. banner ads – significant conditions no further than 'one click' from the ad itself. Terms must be available for the full duration of the promotion.
- Offers should not appear on responsible gambling pages.
- The following terms must be flagged:
 - Having to match the 'free' deposit
 - Having to bet the 'free' deposit
 - Having to match 'free' amounts
 - Having to bet X times before they can withdraw

- Don't call it 'risk free' unless it is "Enhanced odds" winnings paid in free bets

14.3 VIP/HIGHER VALUE CUSTOMERS ('HVC')

- B2C operations must undertake 'full customer assessments' before offering any VIP/HVC incentives, rewards or special treatment. These checks will be regular and ongoing and commercial pressures will never override welfare considerations.
- Promotions and bonuses should never be offered to players whose accounts are closed due to problem gambling concerns or whose accounts are subject to AML requests and have not yet provided the necessary evidence.
- Relevant training will be given to all Marketing and VIP team members to ensure they understand their responsibilities.
- All VIP Marketing including telemarketing must be considered in line with this Policy.
- VIP/HVC reward programmes will maintain full audit trails and have clear lines of senior oversight and accountability for their conduct.
- VIP/HVC reward programmes will be conducted with consistent, clear and transparent good practice to prevent gambling-related harm.

For more information on VIP procedures beyond advertising and marketing, please refer to B2C operational procedures and marketing approval process.

APPENDIX A - RELATED DOCUMENTS

- BTC Marketing Approvals Process
- Group Social Media guidelines
- Group Communications and Public Relations guidelines
- ASA and CAP guidance (UK)
- Industry Group for Responsible Gambling – Gambling Industry Code of Socially Responsible Advertising - 6th Edition October 2020
- BGC Industry Safer Gambling Commitments
- BGC High Value Player (VIP) Code of Conduct
- BGC CEO Safer Gambling Commitments
- European Gaming and Betting Association - Code of Conduct on Responsible Advertising for Online Gambling