

**SUPRPLAY**

**MARKETING POLICY**

**SWE MARKET  
VERSION 1.7**

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## **1. Introduction**

As of January the 1st, 2019, a new gambling regulation has come into force - see the new law in Sweden pertaining to gambling (2018: 1138) [here](#).

The monopoly of gambling is suspended and replaced by a licensing system where all - state and private, Swedish and foreign companies, that fulfill the license terms may be allowed to manage gambling.

SuprPlay Ltd & the SuprNation Group comply with the Sweden Gaming Act (2018:1138), and the Swedish Marketing Act ( 2008:486), including all relevant marketing rules pertaining to its Swedish gambling licence. This also includes instructions from Konsumentverket (the Consumer Agency in Sweden) in terms of marketing in a compliant manner in Sweden, the SPER/BOS guidelines and TU's gambling recommendations: <https://tu.se/tu-in-english/>. Please see below for more information.

## **2. Basic Advertising Compliance**

At a basic level, all advertisements must:

1. contain a Responsible Gambling message;
2. contain a reminder on age restriction;
3. be ad labelled very clearly;
4. ensure that the sender is clearly identifiable;
5. very clearly state any sponsorship, if applicable
6. ensure that any terms of an offer are clear and complete and all significant terms for participation are highlighted to the player accordingly, where it is practical to do so.
  - a. Where it is not practical, the full terms of the offer should be no further than one click away, and readers should not need to scroll downwards to see the full terms;
7. state contact information for an organisation that provides information about and support in connection with gambling issues. "Stodlinjen". There must be contact details for players to use should they wish.
  - a. For digital ads, please note that the word "Stodlinjen" should link to Stodlinjen's website which shows the contact details

The following sections of this policy build on this basic guidance above.

### **3. Socially Responsible Advertising**

The gambling law introduces a requirement that all marketing should be moderate. In the metric assessment, guidance can be obtained from the TU's gambling advertising recommendations. In order for such marketing to be considered moderate, the content should:

1. in a correct and balanced way present the chances of winning so that they do not create the impression that the chances of winning are greater than they actually are. Any unfounded statements about the chances of winning or how much one can win shall be prohibited (and hence statements such as “the jackpots keep on growing” or “the casino is looking for the next winner” are not allowed;
2. not communicate the image of gambling as socially attractive or in a way that leads to sexual success
3. ensure that information on responsible gambling is clearly stated in marketing, having sufficient space, being readable and clearly perceivable.
4. state contact information for an organisation that provides information about and support in connection with gambling issues. Please note here that the “Stodlinjen” logo (or any other suitable organization) is not enough – there must be contact details for players to use should they wish. For digital ads, please note that the word “Stodlinjen” should link to Stodlinjen’s website which shows the contact details therein
5. not be formulated by using well-known people suggesting that the participation of people in games has contributed to their success;
6. not give the impression that participation in gambling is a solution to financial problems or can improve the gambler’s social status and should not give the impression that a marketing offer is free;

7. not portray gambling as necessary, or as a priority in life, e.g. ahead of family, friends, education or professional commitments;
8. not contain statements about gambling as a solution to social and economic problems;
9. not urge excessive gambling or in any way put pressure on people to gamble;
10. not contain statements that gambling is risk free or that there are products that cannot lead to problem gambling;
11. not contain statements that exaggerate the chances of winning or suggest that a player is guaranteed to win;
12. not contain claims or suggestions that the outcome of a draw in a game of luck is dependent on or can be affected by anything other than chance;
13. ensure that it is not suggested that it is possible to gamble anonymously or without registration for games that require registration under the Gambling Act.
14. ensure that marketing does not contain claims that gambling itself enhances – or can enhance – positive personal qualities, e.g. that gambling can improve consumers' self-esteem, and self-respect or result in recognition or admiration;
15. ensure it does not represent gambling in a context that links gambling with strength or irresponsibility;
16. ensure that it does not contain claims that gambling affects the player's individual strength and ability to take responsibility;
17. ensure that it does not convey degrading views of moderate gambling;
18. ensure that it does not promote gambling behaviours where consumers lie about their gambling;
19. ensure that it does not encourage consumers to borrow money to gamble;

20. ensure that it does not promote gambling behaviours where a consumer thinks more about gambling than the consumer really wants;
21. ensure that it does not promote gambling behaviours where a consumer dedicates more time and money to gambling than the consumer really wants;
22. ensure that it does not advocate for or encourage consumers to chase past financial losses;
23. ensure that it does not encourage gambling with money that the consumer cannot spare;
24. ensure that it does not promote or encourage criminal or asocial behaviour;
25. ensure that it does not claim that the chance of winning is affected by factors that constitute superstition;
26. ensure that it does not contain pressuring messages such as "you must", "you have nothing to lose" or "come now";
27. ensure that it does not play on stereotypical notions of male and female;
28. ensure that alcohol does not appear in gambling marketing; and
29. ensure that it has a design and a visual language that is not perceived in any other way than moderate and responsible.
30. not contain gender discriminatory statements;
31. not target vulnerable groups of people;
32. not make use of pop-up / takeover advertising when marketing games involving money on a website other than the gambling company's website;
33. Under SFS 2020:495: [Ordinance for temporary responsible gambling measures in response to the spread of the disease Covid-19 (temporarily amending Gambling Ordinance (2018:1475)], ensure where a bonus is offered, the value of a bonus shall be no more than SEK 100.

34. not display gambling company logotypes and advertisements on sites that are illegal or unethical, such as illegal movie streaming / piracy sites, on sites wherein this would constitute any sort of infringement of law or other private rights of third parties or on sites that otherwise contribute to an image of the gambling industry that we do not want to be associated with, such as pornography.
35. not use forms of marketing so as to attract special attention, this for instance in the form of pop-up or take-over advertisements on newspaper' websites or other websites where customers are not able to use the specific site without having to be in immediate contact with marketing (including but not limited to instances where marketing ads are placed in the background covering the whole screen). Consumers should also not need to click to close a marketing ad prior to being able to read the information on the site they have chosen to visit;
36. not use marketing as part of the registration process whatsoever;
37. not use SuprPlay's Swedish licence symbol, number or information in any way that would draw special attention to the fact that SuprPlay is in possession of a Swedish licence by using words or graphics that make it seem like an award or something unique or special that SuprPlay possesses;
38. not use any references or IP rights pertaining to Bank ID. This includes the Bank ID wordmark or logo.
39. not contain any offers or bonuses (besides the initial welcome bonus on one brand as permitted by Swedish legislation). Hence it is prohibited to send out any loyalty schemes, cashback deals, paybacks, lowered fees, free games, or other reward or goodwill programs or any form of bonus or other gifts whatsoever to Swedish players.



40. not imply that players may be getting a benefit out of any spells or “magic” as part of their customer journey on the site. There should be nothing within marketing content to imply that SuprPlay is giving any kind of reward or advantage by participating on any SuprPlay Websites, whether in relation to “treasure chests”, “welcome chests”, “spells” or “magic” or similar. Such wording is not permitted, nor are any other terms or similar phrases that would mislead our customers into thinking they will get a benefit of some sort.

#### **4. Protecting those under the Age of 18**

We shall take all reasonable steps necessary to prevent minors from participating in gambling. Gambling marketing shall not be specifically targeted at minors. This shall be achieved by ensuring:

1. that marketing does not especially address children or adolescents who have not reached the age of 18;
2. that the overall impression of marketing, through the choice of, for example, music backgrounds, characters, as well as the choice of channels and media, is not specifically appealing to minors;
3. that information on age limits is clearly stated on marketing content;
4. that marketing is not designed to exploit the inexperience or ignorance of minors;
5. that marketing does not contain any notions or claims that gambling marks the transition from adolescence to adulthood;
6. that marketing does not take place in close proximity to schools and schoolyards;
7. that individuals or groups of minors do not play a central role in gambling advertisements, other than in contexts describing public goods to which gambling companies contribute, provided that gambling products are not directly advertised;
8. that special caution is observed in cases where minors, without having a central role (for example as a peripheral element in the background, as part of a family or equivalent), nevertheless appear in gambling marketing so that the marketing cannot indirectly be considered addressed to or particularly appealing to minors; and

9. that marketing of gambling companies, its products or its logos, are not reproduced on clothing, equipment or products intended for use by minors.

## **5. Sponsorship Rules**

Marketing in the form of sponsorships shall be done in a transparent manner so that the consumer can clearly identify the company as a sponsor. Notwithstanding the ban on marketing addressed to minors, it is permissible to sponsor public goods for minors. In exchange for such sponsorships, the company may often receive the right of brand exposure. However, such exposure is not permitted on clothing, equipment or products intended for use by minors. This shall be achieved by ensuring:

1. that the company establishes a regulatory framework for its sponsorships, which states that all sponsorships are documented and followed up;
2. that the sponsorship does not adversely affect minors;
3. that no sponsorships are allowed of events organized for – or primarily addressed to – minors, such as youth cups and tournaments; and
4. that the sponsor's marketing materials are not used in marketing designed for – or primarily addressed to – minors.

## 6. Guidance on the Use of Certain Phrases

1. Ads should not include taglines such as “fast and simple”, “It just said swoosh”, or “I didn’t even blink”.
2. Marketing should not contain pressuring expressions such as “you have to”, “you have nothing to lose” or “come on”.
3. We also should not use terms or statements which call upon a player/consumer to take an action such as “play now” or “play here”, “start playing now”, “play directly” or “bet now”. However the phrase “click to play” on relevant buttons in ads or on websites is construed as being informative and acceptable.
4. The Consumer Authority in Sweden has also found phrases such as “fast / faster / fastest payouts” or “the profit in the bank within five minutes” to be a breach of moderate and compliant marketing, and so similar phrases are also to be avoided. Such taglines must also not imply that there is no need for a customer to register or have a gambling account.
5. The following phrases are therefore also prohibited in Swedish: “snabbare utbetalningar”, ”blixtsnabba uttag”, ”uttag inom 5minuter”, ”pengar på kontot inom 5min”, ”Spela nu!”, ”Spela Direkt”, ”Satsa Nu”, ”Pröva Lyckan”, ”Börja Spela” or “slipp registrering”, “valkomstkista”.
6. On the other hand, permissible phrases can be: “Läs mer” (read more), “Till Registrering” (to registration) and any other similar phrases that are informative instead of imperative. Also these phrases are also permissible: “enkel registrering” and “utan krånglig registrering”.

7. In November 2019, the Swedish court ruled that it was in full agreement with the Consumer Agency in regard to the prohibition of takeover adverts and the following statements in any marketing targeting Swedish players:
  - a. "The trick is spread fast as lightning: account can be filled in 5 minutes"
  - b. "Winnings in the bank account in five minutes - completely without registration"
  - c. "Pay-outs fast as lightning"
  - d. "This is the crystal clear path to gold"
  - e. "This is how you can gain millions without registration"
  - f. "Winnings in your bank within 5 minutes"
  - g. "This is how you can get millions on your way to work"
  - h. "This is how they used the technique to gain big winnings"
  - i. "Play about millions - completely without registration. The success tactics."
  - j. "Won the super winning - money in the account in 7 minutes"
  - k. "PLAY NOW"
8. Ads should not include claims that gambling can be an alternative to work;
9. The ad should not include claims that it is risk-free to play. For instance, claims that customers can "play safe" or play securely" as this may be misleading to players who may assume their gambling is risk-free. Use of these may be permissible should this be qualified in terms of electronic verification. However, note that "Bank ID" specifically in words or using any IP rights such as logo or trademark is also not permissible (as per above). Hence alternatives such as "Mobile ID/Mobilt ID" may be used instead. Therefore note it is permissible to use "Play securely with Mobile ID" or similar.

## 7. Treating Players Fairly

Marketing content or offers (whether by ourselves directly or on our behalf via third-party providers) should:

1. Marketing content or offers (whether by ourselves directly or on our behalf via third-party providers) should:
  - a. be ad labelled very clearly;
  - b. ensure that the sender is clearly identifiable in all marketing.
    - i. This also means that clear marketing labeling must be part of collaborations with influencers and bloggers and when purchasing editorial content, unless otherwise stated in applicable legislation, such as the Radio and TV Act.
  - c. very clearly state any sponsorship, for example in the case of branded content;
  - d. be very clear, understandable and factually correct and should ensure that terms of the offer are clear and complete and all significant terms for participation highlighted to the player accordingly, where it is practical to do so. Where it is not practical, the full terms of the offer should be no further than one click away, and should not need to scroll downwards to see the full terms;
  - e. If these terms of use (or game rules) are changed, and the change is not insignificant, inform players of the changes before they take effect for example, by player approval of the new terms of use when logging in.
  - f. where a bonus to a player is offered, inform the player in clear and plain language of the terms and conditions of the offer.

- g. where a bonus to an individual player is offered, may not be offered on terms that differ from those offered under the same conditions to other players who play the same game. A player shall have at least 60 days to fulfil any terms that may have been linked to the payout of a bonus.
- 2. To ensure that consumers can reasonably predict what kind of AML documentation he/she may be required to furnish, all players receive an email upon registration to their casino inbox, outlining said potential documents etc. This advises players to proactively provide these documents so future withdrawals may not be delayed.
- 3. We provide an electronic link to the ODR on our websites in our terms and conditions (under the complaints section) which is easily accessible to consumers. This same section details ensure information about where to turn with any complaints or questions about marketing offers (customer service or the like);
- 4. As a business, we must ensure the payment of a bonus shall be made as soon as possible after the terms and conditions have been met.



## **8. Reliable Marketing**

Marketing shall be reliable and not misleading. Marketing shall be designed in such a way as not to compromise consumer confidence in gambling as a form of entertainment. Marketing claims shall be factually correct. This shall be achieved by ensuring:

1. that marketing is not designed in a way that misleads the consumers;
2. that marketing does not contain false information about the size of winnings;
3. that marketing of previous winners or winnings is not incorrect or false;
4. that marketing does not exaggerate the chances of winning or suggest that a player is guaranteed to win;
5. that marketing does not contain claims or suggestions that the outcome of a draw in a game of luck is dependent on or can be affected by anything other than chance;
6. that marketing does not portray the game to be a quick / faster path to winning;
7. that any conditions for participating in a marketing activity or for accessing offers (including supplementary benefits) are clear and accessible to the consumer in a manner appropriate to the distribution and marketing channel, allowing the consumer to make an informed decision about his / her gambling;
8. that information on each type of gambling product and game is provided in terms of:
  - a. win frequency and/or prize plan, if applicable to the product,
  - b. and the share of bets that is paid to players in the form of winnings (RTP share);

9. that the sender is clearly identifiable in all marketing. This also means that clear marketing labelling must be part of collaborations with influencers and bloggers and when purchasing editorial content, unless otherwise stated in applicable legislation, such as the Radio and TV Act; and
- 10.that the marketing cannot be confused with advertising for gambling companies/brands that do not have a gambling license.

## **9. Self-Excluded (“SE”) Players**

1. No marketing communication or content is to be sent to any self-excluded players;
2. On registration and every login a check is made on the players details against the list of self-excluded players on SuprPlay’s sites (voodoo dreams.com; nyspins.com; duelz.com) and also against the Swedish National Database i.e. Spelpaus.se. (the site on which players can self-exclude directly and nationally);
3. Hence prior to sending out any marketing communication, checks will be made towards the Spelpaus register prior to sending any marketing to players. If the answer returned is a YES (denoting the player is self-excluded on Spelpaus) then no marketing may be sent out to that player. We need to ensure that such players are removed from our marketing database as soon as possible and no later than 48 hours after the check.
4. In terms of checks in terms of whether a player is self-excluded on any SuprPlay sites, please note that if a player self-excludes on one site, they will automatically be self-excluded for the same duration on our sister sites. Hence no marketing should be sent out to these players, at least within 48 hours of their having self-excluded, and ideally within 24 hours or as immediate as possible;
5. If a player has closed their gaming account (excluding self-excluded accounts), we may direct marketing to the player only if the player actively approves such marketing in conjunction with the account closure.
6. We ensure that information on responsible gambling is clearly stated in marketing, has sufficient space, is readable and clearly perceivable.

## **10. BOS and SPER Guidelines**

The BOS & SPER Guidelines are also applicable in Sweden. At a high level, this means the company commits to ensuring:

1. Marketing shall be reliable and not misleading
2. Moderation shall be observed when marketing
3. Gambling Marketing shall not be addressed/appealed to those under the age of 18.
4. Sponsoring shall be done in the spirit of responsible gambling
5. Information is provided to players on gambling-related problems.
6. Marketing is not designed so as to be perceived as intrusive.

For more information, please see the full guidelines [here](#).

## **11. Data Protection & Privacy**

1. No marketing to be sent out to third parties (who are not customers of ours) without their specific and informed consent. This is applicable mostly to our affiliate partners.
2. For our own customers, we avail of soft-opt ins as consent to send marketing and hence are able to send out to customers of ours noting that:
  - a. An opt-out option is always present within any text/email sent to them so they may opt out whenever they choose. Should they opt out, any marketing communication must cease immediately;
  - b. The player has not yet opted out from one or more types of marketing prior to sending out. This is also applicable to our affiliate partners.
3. We shall not feature individual winners in marketing material without documented evidence of their consent.

## **12. Compliance Approval Process (Internal) Marketing.**

1. SuprPlay intends to conduct advertising and marketing of its business by affiliate websites, TV advertisement, banners, and any other media, channels, and methods the company may from time to time decide. SuprPlay undertakes to comply with the advertising regulations which apply to the form of media in which we advertise our gambling services and follow all relevant industry codes of practice on advertising.
2. All promotional material produced, whether by SuprPLay or by means of outsourced marketing agencies or other third parties, must follow this policy and guidelines. For material produced internally, this will go through an approval process before being published.
3. For internal compliance checks, this shall consist of:
  - a. First: the SuprPlay Marketing Team conducts an initial compliance check referencing the policy herein and any other applicable guidelines
  - b. Second: for a compliance check to be carried out by the Compliance Team, the Marketing team then forwards this material via Jira (our internal tool used to record our approvals for audit purposes). This can be accessed [here](#)
  - c. Finally: Marketing Lead shall then give the final approval before any material is published. Recording the same on Jira.

### **13. Compliance Monitoring Process (External) Marketing.**

1. Please also note that Affiliate partners must also adhere to our affiliate T&Cs and this policy at all times, whether pertaining to marketing or otherwise.
2. A review process shall also apply in terms of the review of any marketing, advertising or promotional content to be used by third parties on behalf of SuprPlay, whether these are affiliates, media agencies or any other third party media partner.
3. The Marketing team make necessary monitoring checks on affiliate marketing content in Sweden. The Marketing team check whether the text, link or image is compliant in accordance with the rules, which have been set up to reflect Swedish law and licence requirements for marketing. These include for instance, whether there is a plus 18 sign on the content, whether there is a reference to terms and conditions and so on. They also check for popunders should this be relevant. They carry out regular checks of all SuprPlay affiliates by using keywords to flag content for review.
4. Should there be any need for escalations, the content shall be passed on to the Compliance Team for further checks (and will follow the same approval flow as above, namely: Marketing Team -> Compliance Department -> Head of Marketing or CMO).
5. To further strengthen our compliance controls in this regard, we ensure that contracts with our affiliates oblige them to comply with the same requirements as SuprPlay, otherwise their contract with us will be reviewed and possibly terminated.

## **14. Employee Training**

Within an appropriate period of the commencement of employment, relevant employees are to be provided with training to ensure they are aware of measures, policies, controls and procedures that are in force. This training shall include:

1. Marketing Compliance
2. Relevant legislation
3. Player Protection and Corporate Social Responsibility
4. Responsible Gambling training on the characteristics and symptoms of gambling problems,

The training provided to employees is to be recorded and refreshed at least annually, or earlier should there be any changes to relevant laws or additional guidance or any major changes to the business to be reflected in the Policy accordingly.

Such training is currently carried out online.

All the Company's relevant staff are trained as it helps maintain a culture of compliance and they need to understand the importance of responsible advertising

Training materials are updated when:

1. Regulatory / licence requirements require the business to do so;
2. Shortcomings are identified in practice in the business.

All training conducted is documented and a record is kept of the content, name of the participants and date of the training.



## **15. Management Involvement**

The board of directors commits itself to reviewing and approving the policy and will be kept up to date with any developments and changes in the Group's policy through discussions with the CMO, Compliance Team and/or the responsible senior members of the staff and through training that they will be obliged to periodically attend.

The Board also commits itself to ensuring that a positive cultural attitude toward compliance prevails in the organisation. This will be driven by various initiatives including inter alia:

1. Setting the tone from the top;
2. Staff training to ensure they remain competent and up to date;
3. Ensuring that sufficient resources will be provided to the relevant teams in order to remain compliant. This includes not only hiring staff but also hiring the most appropriate staff.