

Estonia Marketing Policy & Procedures V1.0

SuprPlay Ltd/SuprNation Group

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1. Policy and regulations

SuprPlay and all other companies forming part of the SuprNation group of companies (hereinafter “SuprNation”) is committed to advertise and promote its services in a socially responsible manner, with particular focus on ensuring the protection of children, young persons and vulnerable persons. This Advertising and Promotion Policy must be adhered to by SuprNation, as well as any third party performing advertising or promotions on behalf of SuprNation, including

affiliates.

This Policy encompasses relevant provisions of the:

- Estonian Gambling Act 2008
- Advertising Act
- Media Services Act
- Guidelines For Fulfilling Requirements For Gambling Advertising

The Consumer Protection Board exercises state supervision over the area of consumer laws and advertising.

2. Conduct, Applicability & Compliance Review Process

SuprNation 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.

SuprNation undertakes to comply with the advertising codes of practice which apply to the form of media in which we advertise our gambling services and follow all relevant industry codes of practice on advertising.

All promotional material produced, whether by SuprNation or by means of outsourced marketing agencies or other third parties, must follow this policy and guidelines and will go through an approval process before being published.

- A. Internal compliance checks, shall consist of:
- B. First: the SuprPlay Marketing Team conducts an initial compliance check referencing the policy herein and any other applicable guidelines
- C. 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](#)
- D. Finally: the Marketing Lead shall then give the final approval before any material is published. Recording the same on Jira.

This 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 SuprNation, whether these are affiliates, media agencies or any other third-party media partner.

A. Compliance Checks for Affiliate (external) Marketing.

1. The marketing team make necessary checks on affiliate marketing content.
2. The marketing team check whether the **text, link or image is compliant in accordance with the rules**, which have been set up to reflect Estonian law and licence requirements for marketing.
3. They carry out regular checks of all SuprNation/SuprPlay sites by using these as keywords to gather all content relating to such websites and hence ensure all marketing content is compliant when related to these sites.
4. Should there be any need for escalations, the content shall be passed on to the Compliance Dept for further checks via the Jira system.

3. General Marketing Guidelines

In particular, any advertising or promotion promoting the gambling services offered by SuprNation, must not:

- Encourage any person to contravene any gambling law or other law.
- Encourage or target Estonian residents under 21 years of age to gamble
- Encourage or target non-Estonian residents who are underage according to local law to gamble

4. Estonia Specific Marketing Guidelines

1. Advertising shall, given ordinary attention, be clearly distinguishable from other information and its content, design and presentation shall ensure that it is recognised as advertising
2. advertising shall contain, in a clearly distinguishable manner, the name of the person placing advertising, the Estonian or European Community trade mark thereof which is under registration or has been registered or the domain name thereof
3. advertising of gambling shall not contain an incitement to participate in gambling or information which may suggest that gambling contributes towards social success. Prohibited incitement refers to the use of imperative mood, but in some cases also that of superlatives and other inviting features. For example, the phrases alike the following are prohibited:
 - a. come play,
 - b. come try,
 - c. come see,
 - d. try out,
 - e. play now,
 - f. participate in the game;
 - g. (imperative versions of) buy, use, take, win;
 - h. be the first,
 - i. super offer,
 - j. awesome games,
 - k. amazing prizes
4. advertising of gambling towards Estonian residents shall include the textual warning: "Tähelepanu! Tegemist on hasartmängu reklaamiga. Hasartmäng pole sobiv viis rahaliste probleemide lahendamiseks. Tutvuge

reeglitega ja käituge vastutustundlikult!” [“Attention! This is advertising of gambling. Gambling is not a suitable means for solving financial problems. Examine the rules and behave responsibly!"].

- a. The warning shall, given ordinary attention, be noticeable, understandable and clearly distinguishable from other information.
 - b. Variations and abbreviations in the wording of the warning are prohibited.
 - c. As a general rule, this warning has to be added to each gambling advertisement separately. The only exception concerns websites – one warning on the homepage is sufficient provided that the warning is clearly visible, comprehensible and clearly differentiated from other information. Therefore, we do not have to add the warning to each advertising banner and area separately
 - d. Re advertising banners outside of the homepage, every banner has to have a separate warning on it. The aforementioned requirement has a specification for flash banners where pictures alter without any additional clicks from the consumer, i.e. there is no clicking to reach another website. In the case of such flash banners, it is sufficient if the warning is included in one frame only. However if there is a final stop-frame, then that has to be the one with the warning. Therefore, stopping on a final stop-frame is not allowed in the case of flash banners if that final frame does not include the warning
 - e. Such information has to be noticeable given ordinary attention and the warning should be presented proportionally to the whole advertisement, in a reasonable format and font and, in the case of a commercial video, of a necessary length so that the consumer would realistically be able to understand the information provided
5. Advertising of gambling towards Non-Estonian residents shall include a socially responsible message
 6. Disclosing the trade mark of SuprNation is prohibited in and on the buildings and territories in the use of pre-school child care institutions, basic schools, upper secondary schools, vocational educational institutions, hobby schools, permanent youth camps and youth project camps and in close proximity thereof, on websites directed at children and before and during television and radio programmes which are mostly directed at children.
 7. Advertising shall not be contrary to good morals and customs, neither shall it provide untruthful information

8. Advertising shall not:

- a. be contrary to good morals and customs;
- b. incite to act unlawfully or violate prevailing standards of decency, justify offences or degrade lawful behaviour;
- c. incite to behave violently or incite to use violence;
- d. incite to activities harmful to human health or the environment,
- e. contribute to the feeling of safety not corresponding to the reality or to dangerous behaviour;
- f. incite to activities endangering public order and national security and support or favour such activities;
- g. take advantage of the effect of an accident or emergency situation on a person's capacity to exercise will
- h. play on people's superstition or take advantage of the credulity of the target group arising from age;
- i. directly or by implication degrade or in some other manner denigrate a person, a person's name, trade mark, a geographical indication, activity, area of activity, goods, services or an event;
- j. contain denigration or discrimination on the grounds of nationality, race, age, colour, sex, language, origin, religion, political or other beliefs, financial or social status or other circumstances;
- k. contain directly or by implication a feature which is a well-known feature distinguishing other persons, goods or services from other similar persons, goods or services if advertising of the other persons, goods or services is prohibited at the given time or place or in the given manner;
- l. contain advertising of other persons, goods or services if advertising of such persons, goods or services is prohibited at the given time or place or in the given manner;
- m. suggest that the information presented has a scientific basis if it actually has not;
- n. contain the words "keskkonnasõbralik" ["environment-friendly"] or "ökoloogiliselt ohutu" ["ecologically safe"] or other words or expressions with the same meaning if there is no such evidence;
- o. claim or suggest that the goods or services have special features if such features are characteristic to all similar goods or services of the same type;

- p. refer to properties of the goods or services which cure, treat, mitigate or prevent diseases, malfunctioning or malformations, except in the cases provided by law;
 - q. ignore the principle of gender equality within the meaning of the Gender Equality Act, degrade one sex or depict one sex as a dominating or subordinate sex;
 - r. depict persons as sexual objects, contain inappropriate nudity or use expressions or images with a sexual undertone;
 - s. contain visual or audible presentation of a sexual act.
9. It is prohibited to provide information in advertising that creates an impression of a link between gambling and increase in friendships, sexuality, wealth, etc
10. It is prohibited to use national symbols and the symbols of state agencies and the colour combination of the Estonian flag in advertising in a manner that misleads the public concerning the subject of the advertising.
11. Advertising shall not suggest that the information presented contains a recommendation from or a guarantee of the state if it actually does not.
12. A person shall not be referred to or used in advertising in any manner, including by using the voice, images or pictorial representations of the person unless prior written consent has been obtained from the person.
13. In advertising and teleshopping transmitted upon provision of media services it is prohibited:
- a. to use subliminal techniques;
 - b. in television services, to use the voice or image of a person who appears as an anchor or commentator in programmes on political events or issues or as an announcer in a news programme."
14. Advertising of works which contain pornography or promote violence or cruelty is prohibited.
15. Social media influencers: Advertisement posts on social media must be marked clearly from the beginning so that the followers understand immediately when reading/viewing/listening that this is an advertisement. To mark an advertisement, the #reklaam hashtag is appropriate.
- a. The hashtag should be used at the beginning or in the title of the post published in any social media platform (blog, Instagram, Facebook, Twitter, etc.).

- b. If the post does not have a defined text section (such as in an Instagram Story or in TikTok), the mark indicating advertisement must be reasonably visible for the person consuming the visual of the post.
 - c. If your followers are mainly located in Estonia, we recommend making the marking in Estonian as well, regardless of the language of the post. In other languages, we recommend marking the advertising posts with hashtags in the respective languages, e.g. #advertisement in English or #реклама in Russian.
16. To distinguish it as an ad: You can also use the existing options of the platform for marking (e.g. the Paid Partnership tag of Instagram) or write the nature of the advertisement content as a full sentence on the first text row of the post (in a blog post, for example).
- a. In the case of audio-visual media (e.g. YouTube video or podcasts), you must indicate in audio and/or video within the first minute (for example, by text in the video) that the video includes advertisements, products gifted by brands or product placement. Additional information on the advertised content (e.g. which brand ordered the advertisement) may be added into the video description.

5. Protection of Children/ Minors

Advertising shall not play on people's superstition or take advantage of the credulity of the target group arising from age. Where relevant, account profiles for our websites on social media will clearly carry '21+' symbols or a 'no-under 21s' type message as well as a reference to "Play Responsibly". We will carry the required social responsibility and age requirements on consumer-facing marketing content on its YouTube channels. We also use the Twitter age-screening function when marketing to consumers and we age restrict all direct marketing videos uploaded to YouTube. For more information on these controls, please refer to the social media section below.

By employing these controls, SuprPlay ensures children / minors will not be targeted by advertising. An advertising is directed at children when the advertising is directly or implicitly related to children, for example:

1. implementation of advertising is childlike (e.g. images and/or voices of character(s) of cartoons and/or children's literature are used, contains characteristics of children's brand(s));
2. Goods and services designed for children are advertised (excl. baby supplies, however, toys are not considered as baby supplies thereat)
3. Advertising is publicised in television or radio programmes (incl. on webpages that enable to watch programmes of the relevant television channel on associated webpage, e.g. TV3 Play, etc.) between children's programme or during directly preceding or immediately following advertising break;
4. advertising is publicised in the Internet on webpages directed at children (e.g. on webpage m.taheke.ee);
5. prizes of a consumer game are goods or services directed at children;
6. a child and/or child's voice is used in advertising (use of a child in advertising inevitably affects and attracts attention of other children to whom such advertising reaches. An advertising that is read in child's voice addresses children even if advertising itself is directed at adults, taking also into account that in the context of the AdA a child is a person who is less than 18 years of age and generally an advertising is accessible to such persons irrespective of the place and time of publicising of this advertising);
7. childlike and/or youthful expressions and/or childlike and youthful visual and audio patterns are used in advertising (e.g. yellow creature in advertising of Delma margarine, use of melody or part of a melody of a children's song in advertising);

8. children or minors are directly addressed in advertising (e.g. “Hey, kids!”);
9. advertised food is served to a child or eaten by a child in advertising.

6. Misleading Advertising

All marketing, advertisements, and invitations to purchase, including “free play” offers shall not be misleading. We otherwise ensure that we and any third parties comply in all respects as required under our Gambling Licences, advertising codes and guidelines. Marketing communications, and advertisements must not amount to or involve misleading actions or misleading omissions.

To that end, advertisements shall not provide inaccurate information. Advertising is considered misleading in particular if it provides misleading information concerning the following circumstances characterising goods, services, sale of goods or provision of services:

1. availability, quantity, composition, fitness for use, existence of accessories, technical data, risks related to use;
2. intended purpose and income received from the use;
3. price and conditions of payment of the price;
4. conditions of exchange, return
5. manufacturer of the goods or provider of the services, their area of activity and qualifications, membership in occupational associations and organisations, observation of codes of conduct, intellectual property rights official recognition, award of a medal, prize or diploma, and supporting of public or charitable events or any other sponsorship.
6. It is prohibited to use the results of scientific or other research, quotations from scientific or technical publications and statistical or scientific data in advertising in a misleading manner

7. Responsible Placement of Digital Adverts

SuprNation will not place digital adverts on websites providing unauthorized access to copyrighted content or other unlawful activities, and we will take all reasonable steps to ensure that affiliates and other third parties do not place such ads on SuprNation's behalf.

Affiliates and any other third parties shall be reminded that it is a breach of this marketing policy, and hence the agreement between us, to place any digital adverts which relate to SuprNation's business on websites providing unauthorised access to copyrighted content and that should this occur, SuprNation may immediately terminate the agreement between the parties.

8. GDPR

Customers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent, this is known as an "opt-out" link. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

9. Self-Excluded Customers

No marketing shall be sent to self-excluded customers. When a customer self-excludes or is self-excluded on any of SuprNation's websites (voodoodreams.com; nyspins.com;duelz.com) or via HAMPPII, their names shall be removed from all marketing databases and no further marketing shall be sent to such customers as promptly as possible. Specifically regarding HAMPPII, SuprPlay does not use the data related to this for the purposes of research of consumer habits or direct marketing, or to transfer the data to third persons. For further protection of the subject's data, we shall identify the employees who need access to the listed data in order to perform their duties and shall notify the Tax and Customs Board of the given name, surname and official title of such employees. SL will employ a system of measures processing the list to ensure this data is only used for the purposes intended outlined by the TCB.

10. Social Media

Account profiles for our branded websites on social media will clearly carry '21+' symbols or a 'no-under 21s' type message as well as a reference to "Play Responsibly".

Advertisement posts on social media must be marked clearly from the beginning so that the followers understand immediately when reading/viewing/listening that this is an advertisement. To mark an advertisement, the #reklaam hashtag is appropriate.

- The hashtag should be used at the beginning or in the title of the post published in any social media platform (blog, Instagram, Facebook, Twitter, etc.).
- If the post does not have a defined text section (such as in an Instagram Story or in TikTok), the mark indicating advertisement must be reasonably visible for the person consuming the visual of the post.
- If your followers are mainly located in Estonia, we recommend making the marking in Estonian as well, regardless of the language of the post. In other languages, we recommend marking the advertising posts with hashtags in the respective languages, e.g. #advertisement in English or #реклама in Russian.

To distinguish it as an ad: You can also use the existing options of the platform for marking (e.g. the Paid Partnership tag of Instagram) or write the nature of the advertisement content as a full sentence on the first text row of the post (in a blog post, for example).

In the case of audio-visual media (e.g. YouTube video or podcasts), we indicate in audio and/or video within the first minute (for example, by text in the video) that the video includes advertisements, products gifted by brands or product placement. Additional information on the advertised content (e.g. which brand ordered the advertisement) may be added into the video description.

11. Age Targeting on Social Media

12.1 FACEBOOK AGE TARGETING

The Facebook policy dictates that gambling operators must geographically and age restrict their Facebook pages which are related to the services that they provide.

Step	Action
1.	Ensure that a message of “18+” and “www.15410.ee “is prominently displayed on the banner image and in the “About” section:
2.	Ensure that you insert the message of “18+” and “www.15410.ee “on every image and post.
3.	Select the appropriate targeting settings as displayed below: <ul style="list-style-type: none"> - “Country restrictions: Page is shown to people in x country” - “Age Restrictions: Page is only shown to people over 21 years of age”.
4.	Ensure that that all content to be posted on SuprNation Facebook profile is reviewed in terms of child appeal. In the case where an already posted asset is deemed to be appealing to underage persons it must be taken down immediately and without delay.
5.	Adverts on Facebook: SuprNation must target only those people who are above 21 years old. That is to make sure that no one under the age of 21 is exposed to our content. <u>Select the appropriate targeting settings as displayed below:</u>

Countries ?
 United Kingdom x Bundles

Cities ?
 List cities or paste in bulk from Excel Bundles

User location ?
 Add coordinates or an address Add
 e.g. 1601 Willow Rd Menlo Park or 37.48327, -122.15033
Add or edit locations in bulk

Show advanced location options

Target users ?
 People who live in this location
 People recently in this location
 Everyone in this location
 People traveling in this location

Age ?
 18 | 65

> CHOOSE CREATIVES ?

ESTIMATED AUDIENCE SIZE
43,000,000
 • Location - Living In:
 • United Kingdom
 • Age:
 • 18 - 65+
 • Placements:
 • on pages: News Feed on mobile devices, News Feed on desktop computers, Right column on desktop compu...more

Audience Split

SAVED AUDIENCES

Apart from restricting underage persons access to SuprNation Facebook page, these settings will also only target people who actually live in the country in question as to ensure that no one who travels to the country is able to see our ads.

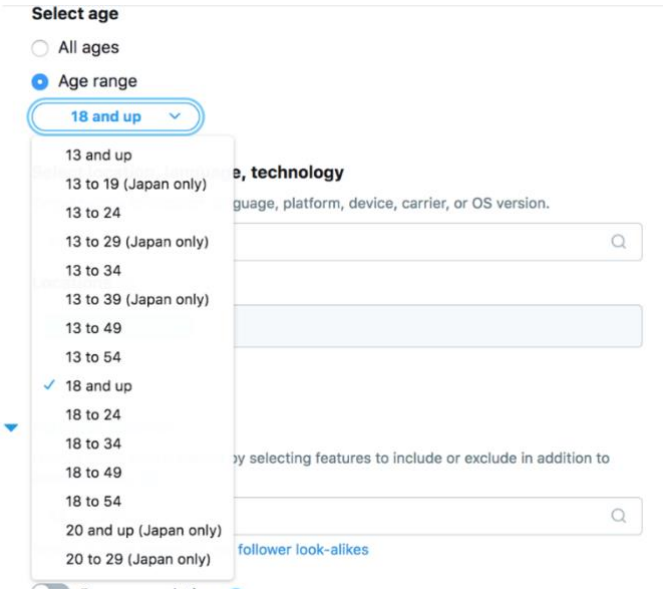
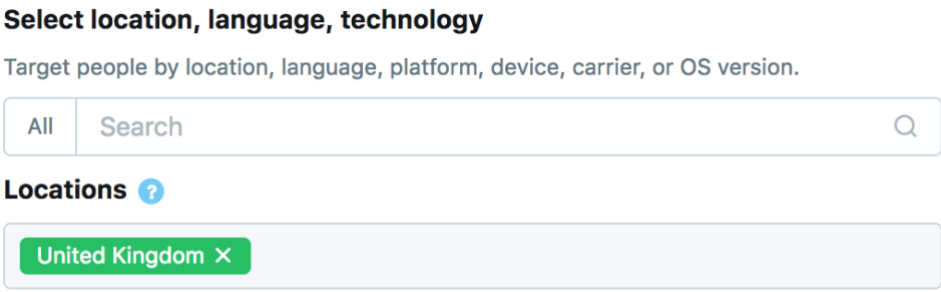
12.2 INSTAGRAM AGE TARGETING

When it comes to Instagram we are age and country restricted, it is a part of Facebook's policy, but requires a few steps from us as advertisers. We must ensure to take those steps in order to be compliant.

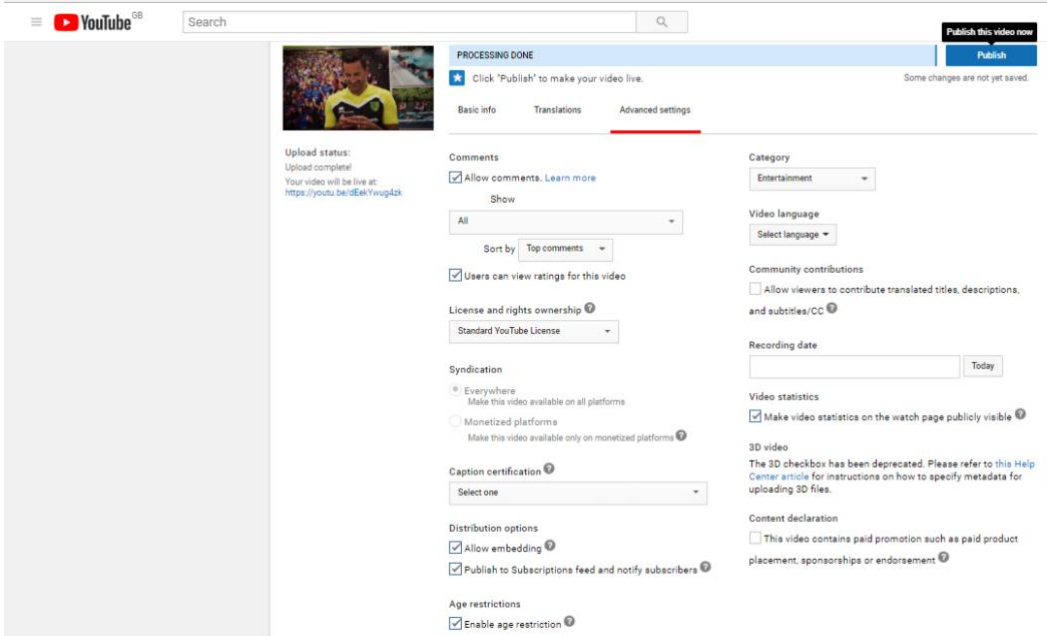
Step	Action
1.	All the targeting on Instagram works in the exact same way as Facebook, as Instagram is owned by Facebook. There as well as on Instagram, we ensure to always target people who are above 21. The same process is in place for custom audiences here as for Facebook, as the tools used for marketing on Instagram is the same as on Facebook.
2.	Ensure that a message of “21+” and “www.15410.ee” is prominently displayed on every page of the post.

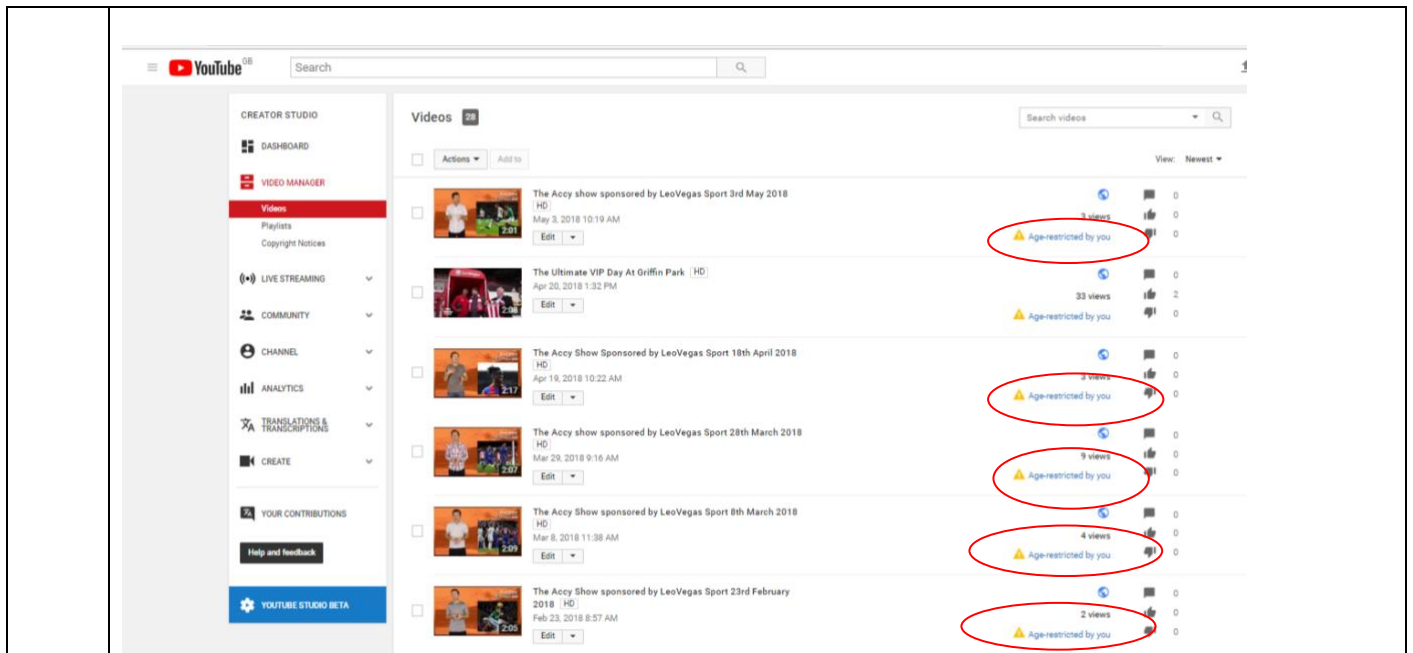
12.3 TWITTER AGE TARGETING

On Twitter, at the moment, we do not have the option in the targeting settings to age restrict SuprNation Twitter handle, but we must ensure that it is clearly and prominently outlined that this page is not suitable for persons under the age of 21.

Step	Action
1.	Ensure that a message of “21+” and “www.15410.ee “is prominently displayed:
2.	Ensure that you insert the message of “21+” and “www.15410.ee “on every image and post.
3.	Ensure to monitor individual accounts that reach out to SuprNation via Twitter. All individual accounts/ individual communications under suspicion of being under age must be ignored and blocked.
4.	<p>When running adverts on Twitter, select the appropriate targeting settings as displayed below:</p> 
5.	<p>Make sure to target persons only within the country in question as displayed below:</p> 

12.4 YOUTUBE AGE TARGETING

Step	Action
1.	<p>Ensure that a message of “21+” and “www.15410.ee “is prominently displayed on the banner image and in the “About” section:</p> <p>.</p>
2.	<p>Age restrict all direct marketing videos uploaded to YouTube:</p>  <p>The screenshot shows the YouTube video upload settings page. The 'Advanced settings' tab is selected. Under 'Age restrictions', the checkbox for 'Enable age restriction' is checked. Other settings include 'Comments' (Allow comments checked), 'License and rights ownership' (Standard YouTube License), 'Syndication' (Everywhere selected), 'Caption certification' (Select one), 'Distribution options' (Allow embedding and Publish to Subscriptions feed checked), and 'Category' (Entertainment).</p>
3.	<p>In order to check the content is correctly labelled ‘age restricted’, head to the ‘Video Manager’ tab in the ‘Creator Studio’ whereby you will see all of your YouTube videos, both published and drafts. Each video is clearly labelled with an age restriction.</p>



12. Third Parties / Affiliates

Responsibility lies with us to ensure that affiliates or other third parties acting on our behalf to publish or otherwise disseminate marketing communications comply with the Codes. Marketers should ensure affiliates comply with gambling- specific guidance as well as its more general targeting guidance.

13. Training

All marketing and compliance staff shall undertake internal training in relation to policies and procedures every 12 months. All marketing staff shall also take marketing training in relation to relevant laws and practices under our licence market at least yearly, or whenever there is a relevant change in applicable marketing legislation. .