

IOM Marketing and Advertising Policy

V1.2

SuprIsle Ltd/SuprNation Group

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1. Policy and regulations

SuprIsle 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:

1. Advertising Regulations 2007
2. IOM GSC Guidance for On-line Gambling
3. Online Gambling Regulation Act 2001
4. UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) is the rule book for non-broadcast advertisement for Gambling

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 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.

All marketing, advertisements, and invitations to purchase, including “free play” offers shall not misleading and otherwise ensure that we and any third parties comply in all respects of the Advertising regulations within the Gambling Supervision Commission’s licence conditions.s.

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. For internal compliance checks, this shall consist of:

1. The SuprIsle marketing team and manager/s doing an initial compliance check referencing the policy herein and any other applicable guidelines;
2. There shall also then be a compliance check to ensure compliance with all laws and regulations. Marketing team shall send all marketing content and the Casino Team shall also send any bonus promotional content or similar via Jira system with an assigned ticket for a compliance check to be carried out by the Compliance Dept. In this case the CLCO or a delegated Compliance officer of SuprIsle shall be conducting such checks to ensure that the material is compliant with relevant legislation;
3. The Head of Marketing,, shall then give the final approval before any material is published, shall oversee the approval process and shall also take any high level marketing decisions affecting general marketing strategies, content and quality.
4. Note the basic flow below as follows: *Marketing Managers -> Compliance Dept -> Head of Marketing*

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.

B. Compliance Checks for Affiliate (external) Marketing.

1. The marketing team shall monitor and make necessary checks on affiliate marketing content .
2. These checks allow the marketing team to check whether the **text, link or image is compliant in accordance with the rules**. These include, for instance, whether there is a plus 18 sign on the content, whether there is a reference to T&Cs, and so on.
3. This tool shall carry out regular checks of all SuprNation/SuprIsle 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 people under 18 years of age to gamble.
- Be false or untruthful, in particular about the chances of winning or the expected return to a player.
- Suggest that gambling is a form of financial investment or in any way mislead players about the risks of gambling. Approaches that give erroneous perceptions of the level or risk involved or the extent of a gambler's control over a wager or gambling in general must be avoided.
- Suggest that skill can influence games that are purely games of chance.
- Promote smoking and/or the abuse of the consumption of alcohol or narcotic substances while gambling.
- Imply that gambling promotes or is required for social acceptance, personal or financial success, or the resolution of any economic, social or personal problems.
- Contain endorsements by well-known personalities or celebrities that suggest gambling contributes to their success.
- Exceed the limits of decency.
- Tarnish the goodwill and privilege that is associated or related in any manner whatsoever with being a licensee, or tarnish the image or reputation of another licensee.
- Contain qualifications in any marketing communications that contradict the claims they qualify.
- Encourage repetitive or frequent participation;

- Portray or otherwise refer to individuals displaying problem gambling behaviours or other behavioural indicators linked to problem gambling;
- be indecent or offensive;
- Mislead. For example, if it makes any claim as to the potential payout or win in relation to any Online Gambling, it shall contain sufficient information to enable a person to determine readily and easily the expected percentage return to him over a period, disregarding any exercise of skill by him.
- contain any statement as to the legality or otherwise of online Gambling or any kind of online gaming, online betting or the like in any other jurisdiction;
- be directed at any jurisdictions in which Online Gambling or any kind of online gaming, online betting or the like is prohibited;
- have any sexual content;
- contain any material in breach of copyright;
- bring the Island or its reputation into disrepute either itself or through its relationship with third parties.

4. Specific Marketing guidelines

SuprIsle must also ensure that:

1. marketing communications, and advertisements **do not amount to or involve misleading actions or misleading omissions.**
2. **all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers on the advert or banner itself.** Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full **no further than one click away.**

Note that for SuprNation, the main significant parameters to take note of are the following:

Targeted Players

New players only / Existing players only / Selected players only

Deposit Info

No deposit required / Min deposit £xx etc.

Info about Offer

Bonus is 100% match on 1st deposit up to £xx etc.

Wagering Requirements and Expiry

5x Wagering requirement / 3-day expiry etc.

Info about Bet Limitations

Min bet £xx / Max bet £xx when playing with a bonus etc.

Game Restrictions

Free Spins on [name of game]/ Selected Games only etc.

Info about Additional Terms

Full terms apply [i.e. "T&Cs Apply" plus link to T&Cs 1 click away or further down (but no scrolling)]

3. the terms and conditions of each marketing incentive **must be made available for the full duration of the promotion.**

4. Terms and conditions of a 'free bet' offer and the customer commitments to take advantage of such offer are stated in the advertisement itself or where advertisements are limited by time or space, significant conditions likely to affect a customer's decision to participate are displayed no further than one click away from the advertisement.

5. **BeGambleAware** logo and link will be shown as per below.

6. **Social Media Marketing,**

- SupriSle has on its corporate webpages the responsible gambling message.
- SupriSle has on its corporate webpages links through to sources of more detailed information.
- Account profiles for operators' branded websites on social media will clearly carry '18+' symbols or a 'no-under 18s' type message as well as a reference to www.begambleaware.org.

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.

5. 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.

5.2 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), their names shall be removed from all marketing databases and no further marketing shall be sent to such customers, this is to take effect as promptly as possible.

In line with our Responsible Gambling Policy, where players are identified as high RG risk, We exclude such players from marketing in the same way.

7. CAP Code Rules

7.1 CAP Rule 16.3 – Marketing Prohibitions, including the protection of minors and vulnerable persons.

SuprNation's Marketing communications must **not**:

- portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm;

- exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children, young persons or other vulnerable persons;
- suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression;
- suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security;
- portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments;
- suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration;
- suggest peer pressure to gamble nor disparage abstention;
- link gambling to seduction, sexual success or enhanced attractiveness;
- portray gambling in a context of toughness or link it to resilience or recklessness;
- suggest gambling is a rite of passage;
- suggest that solitary gambling is preferable to social gambling;
- be likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture;
- be directed at those aged below 18 years (or 16 years for football pools, equal-chance gaming prize gaming, through the selection of media or context in which they appear);
- include a child or a young person. No-one who is, or seems to be, **under 25 years old may be featured** in gambling ads. No-one may behave in an adolescent, juvenile or loutish way. Please note that the ASA will consider the audience's likely understanding of his or her age assessing factors like their appearance and behaviour in deciding whether inclusion of a character breaches these rules and hence the individual featured is over 25 **but may be perceived to be younger, then this is still considered a breach**. Caution should therefore be exercised even **when posting content in social media news feeds**. This rule is however unlikely to apply to crowd scenes where individuals cannot be easily identified and hence not playing a significant role.

Individuals who are, or seem to be under 25 years old (18-24 years old) may be featured playing a significant role only in marketing communications that appear in a place where a bet can be placed directly through a transactional facility, for instance, a gambling operator's own website. The individual may only be used to illustrate specific betting selections where that individual is the subject of the bet offered. The image or other depiction used must show them in the context of the bet and not in a gambling context;

- exploit cultural beliefs or traditions about gambling or luck;
- condone or encourage criminal or anti-social behaviour;
- condone or feature gambling in a working environment;
- for broadcasting media, exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of under-18s or other vulnerable persons.

- No under 18s or individuals who, due to their online behaviour, are likely to be under 18 should be targeted directly with gambling advertising.

- in selecting media, SuprIsle must take appropriate steps to understand the likely audience of media where it intends to place ads – noting that CAP’s placement restrictions apply to all media including online media such as social networking, video sharing or targeted display advertising. Hence all steps will be taken to exclude under-age groups from an audience where tools to do so are available. SuprIsle’s gambling advertising must also not appear in media for children or young people, or where children and young people make up a significant proportion of the audience (i.e. more than 25%). Please see CAP’s “media placement restrictions; protecting children and young people” here: <https://www.asa.org.uk/asset/2DED3F6A-9932-4369-AFE72131059E6B8D.D31EF8F7-1CD4-45D4-A547C3418DEE3569/> and CAP’s guidance on how marketers should use the tools available on social network platforms to ensure under-18s are excluded from groups targeted with gambling advertising: <https://www.asa.org.uk/asset/F0AB1553-1212-4106-8C6E6C0047FEBEBA/>

- Marketing communications may be targeted on the basis of audience composition of the media or specific piece of content around which a marketing communication appears and/or through the use of data, when creating the audience for a marketing communication. Robust evidence that marketers have been diligent in forecasting the likely audience for marketing communication must be made available.

- For TV & Radio Ads (i.e. Broadcast Advertising) – note such ads should not appear in programming or other broadcast content that is commissioned for or principally directed at children and young people or likely to appeal particularly to them. Therefore gambling ads will not be advertised in or adjacent to programmes commissioned for or principally directed at or likely to appeal to audiences under the age of 18. This also includes any broadcast television text or interactive tv ads.

7.2 CAP’s Targeting Marketing Communications: Examples

The following examples are intended to bear out the principles outlined in CAP’s targeting guidance through several gambling-related scenarios:

- **Social media** – Marketers must demonstrate to the ASA that they have used all the tools available to them on a social network platform to prevent under-18s from being targeted. This includes both ad targeting facilities provided directly by the platform and tools that restrict under- 18s’ access to marketers’ own social media content;
- **Parts of websites for under-18s** – The ASA will assess the general audience of websites where a marketing communication appears in line with the guidance in this section above. However, marketers should take particular care to avoid placements on parts of sites dedicated to under- 18s. For example, a football club’s website might have a strongly adult audience in general, but it is inappropriate to place an advertisement in pages dedicated to younger supporters. They are considered children’s media for the purposes of the CAP Code rule on the basis of their intended audience;
- **Social and online gaming** – Gambling-like games or games that feature elements of simulated gambling activity are often popular with children and young people. Such games should not be used to promote real- money gambling products, for instance, by offering a trial version that plays a similar role to an advergaming. Where social and online games feature marketing communications for gambling games, they should not be directed at under-18s. In line with the approach outlined in this section, the ASA will assess the marketer’s efforts to understand the audience of the game and the steps taken to exclude underage groups.

- **Direct marketing lists** – If an individual who is known to be under-18 is included in a direct marketing list, any gambling marketing communication sent to that list will breach the CAP Code. Marketers should administer lists appropriately to exclude under-18s.
- **Influencers** – Marketers should take particular care when identifying influencers to promote their products or brands. They should identify the influencer’s likely appeal and obtain audience data (for instance, the age- breakdown of a follower or subscriber-base) to ensure that under-18s are not likely to comprise more than 25% of the audience. Where such data is not available or incomplete, marketers should exercise caution.
- **Affiliates** – Responsibility lies with gambling operators to ensure that affiliates or other third parties acting on their behalf to publish or otherwise disseminate marketing communications comply with the licence conditions ..

7.3 CAP Guidance – Content likely to appeal to children (under 18)

- **“Particular Appeal” Test.** SuprNation must conduct a test on all content to ensure content does not appeal more to those under 18 than those aged 18 and over. This means an ad may still breach the Code if it appeals particularly to under 18s.
- **Licensed characters.** Licensed characters are used by marketers with permission from third parties who own the character. They can be from film, television, literature and video games; for example, the ASA has ruled on several ads featuring super heroes. The use of characters from media for or targeted in large part at under-18s is likely to be unacceptable. In assessing whether other characters or their use appeals particularly to under- 18s, the ASA will have regard to factors like:
 - the audience and likely appeal of the media from which the character originates;
 - the comic book nature of the character; and
 - the availability of toys related to the character.
- **Animated characters.** Avoid the use of colourful and exaggerated animated characters especially those that are common in children’s cartoons such as animals, pirates or fairy-tale characters. For example, the ASA has ruled against the use of:

- characters based on common fairy tales, like Little Red Riding hood and Hansel and Gretel; and
- a young female character with exaggerated features that created a strong resemblance to characters from princess-themed films targeted at under-18s, particularly young children.

The ASA has also ruled that the use of traditional characters is unlikely to appeal particularly to under-18s unless they are presented in a way that makes the character or context in which they appear more child-oriented. For example, stylizing the character with exaggerated features or accompanying it with ‘cute’ cartoon animals.

- **Other characters.** The ASA is likely to take a similar approach to that outlined in the sections immediately above in assessing the acceptability of other types of character appearing in marketing

communications; for example, puppet animals and other characters listed in the sections above or children's toys.

- **Overall themes and imagery.** The ASA will also assess wider themes of a marketing communication for its appeal to under-18s. That may be in isolation or in conjunction with other ad content such as characters. Marketers should exercise caution when including child-like imagery or narratives, such as those common in nursery rhymes or children's stories. For example, the ASA has ruled against an advertisement that gave the impression that characters were on an adventure in a child-like fantasy world. The ASA noted such general themes were

common in children's stories and games and in combination with other features of an ad made it likely to appeal particularly to children.

- **Game titles.** Game titles are frequently used on gambling operators' websites and often feature the types of character listed above. Where such titles are visible to users who have not been age-verified by suitably robust means, the ASA is likely to find them in breach of the CAP Code.

Marketers should also avoid using names incorporating specific characters familiar to children, as well as more general tropes, themes and imagery from stories or other media directed at children. The ASA has ruled against the use of names such as "Piggy Payout", "Fluffy Favourites", "Pirate Princess", "Jack and the Beanstalk", "Candilicious" and "Transformers" in conjunction with animated imagery and characters of likely particular appeal to under-18s.

- **Sports people and celebrities.** Gambling operators sometimes feature sports people or celebrities in marketing communications. This can often be through an endorsement agreement between the operator and the individual. Such individuals who are or appear to be under 25 are explicitly prohibited from appearing in gambling marketing communications. For older individuals, marketers should be cautious where they are likely to have a significant profile among under-18s, for instance, sports or reality TV stars.
- **Youth culture.** Marketers should avoid the use of themes or content associated with youth culture, including music, video games, fashion, language and other cultural references. The ASA will assess the intended and likely audience and appeal of each when considering the

extent of any association with youth culture. For example, a piece of older music that has a broad age range of listeners is unlikely to have an association with youth culture, while new music targeted at young people is more likely to.

- **Humour.** When using humour in marketing communications, marketers should avoid styles or approaches likely to have particular salience for under-18s; for example, slapstick or juvenile humour.
- **Mitigating effects of suitably robust age targeting.** The ASA will consider whether advertisers have taken all reasonable steps to prevent under-18s from viewing ads; for example, through the:

use of effective age-gating in online environments; or

targeting ads to completely exclude under-18s from those receiving them, for instance, by using a well-administered direct marketing list.

If the ASA is satisfied that marketers have taken such steps and that under-18s are highly unlikely to have received a marketing communication, the use of the types of characters listed above may be acceptable.

7.4 CAP Rule 8.17 & 8.18 – Free Bets & Bonuses

All marketing communications or other material referring to promotions must communicate all applicable significant conditions or information where the omission of such conditions or information is likely to mislead. Significant conditions or information may, depending on the circumstances, include:

8.17.1 **How to participate**, including significant conditions and costs, and other major factors reasonably likely to influence consumers' decision or understanding about the promotion

8.17.2 **Any free-entry route** should be explained clearly and prominently

8.17.3 **The start date** The start date, if applicable

8.17.4 **Closing date**

8.17.4.a A prominent closing date, if applicable, for purchases and submissions of entries or claims. Closing dates are not always necessary, for example: comparisons that refer to a special offer (whether the promoter's previous offer or a competitor's offer) if the offer is and is stated to be "subject to availability"; promotions limited only by the availability of promotional packs (gifts with a purchase, extra-volume packs and reduced-price packs) and loyalty schemes run on an open-ended basis;

8.17.4.b Unless the promotional pack includes the promotional item or prize and the only limit is the availability of that pack, prize promotions and promotions addressed to or targeted at children are likely to need a closing date

8.17.4.c Promoters must be able to demonstrate that the absence of a closing date will not disadvantage consumers

8.17.4.d Promoters must state if the deadline for responding to undated promotional material will be calculated from the date the material was received by consumers, if the omission of that information is likely to mislead

8.17.4.e Closing dates must not be changed unless unavoidable circumstances beyond the control of the promoter make it necessary and either not to change the date would be unfair to those who sought to participate within the original terms, or those who sought to participate within the original terms will not be disadvantaged by the change.

8.17.5 **Proof of purchase** Any proof of purchase requirements

8.17.6 **Prizes and gifts** Promoters must specify the number and nature of prizes or gifts, if applicable. If the exact number cannot be predetermined, a reasonable estimate of the number and a statement of their nature must be made. Promoters must:

- a. distinguish those prizes that could be won, including estimated prize funds, from those prizes that will be won by someone by the end of the promotional period; and
- b. state whether prizes are to be awarded in instalments or are to be shared among recipients.

8.17.7 **Restrictions** Geographical, personal or technological restrictions such as location, age or the need to access the Internet. Promoters must state any need to obtain permission to enter from an adult or employer

8.17.8 Availability The availability of promotional packs if it is not obvious; for example, if promotional packs could become unavailable before the stated closing date of the offer. Any limitation on availability should be sufficiently clear for a consumer to assess whether participation is worthwhile.

8.17.9 Promoter's name and address Unless it is obvious from the context or if entry into an advertised promotion is only through a dedicated website containing that information in an easily found format, the promoter's full name and correspondence address must be stated.

8.18. Marketing communications that include a promotion and are **significantly limited by time or space must include as much information about significant conditions as practicable and must direct consumers clearly to an easily accessible alternative source where all the significant conditions of the promotion are prominently stated.** Participants should be able to retain those conditions or easily access them throughout the promotion.

8. Notable ASA Judgements

Please note ASA rulings here: <https://www.asa.org.uk/codes-and-rulings/rulings.html>
<https://www.asa.org.uk/rulings/bet-at-homecom-internet-ltd-a15-321776.html> (upheld)
<https://www.asa.org.uk/rulings/whg--international--ltd-a19-561616.html> (upheld)
<https://www.asa.org.uk/rulings/leovegas-gaming-ltd-a16-367915.html> (upheld)
<https://www.asa.org.uk/rulings/betfair-casino-ltd-a18-457887.html> (not upheld)
<https://www.asa.org.uk/rulings/leovegas-gaming-plc-a18-456852.html> (not upheld)

9. Training

All marketing and compliance staff shall undertake internal training in relation to policies and procedures every six months. All marketing staff shall also take marketing training in relation to relevant laws and practices in the UK market at least yearly, or whenever there is a relevant change in applicable marketing legislation in the UK or relevant ASA decisions.

10. Approval of IOM Marketing Policy & Procedures

This Policy & related procedures have been approved by SuprNation Management Team, which includes the Directors, CMO and CLCO of licence holder SuprIsle Ltd.