



MARKETING POLICY

**MGA MARKET
VERSION 1.5**

SuprPlay Ltd/SuprNation Group

1. Introduction

SuprPlay Ltd & the SuprNation Group comply with the MGA's requirements and recommendations as to marketing and is compliant in all areas of law including marketing provisions. Relevant laws that apply here stem from:

1. Gaming Commercial Regulations (Gaming Act)– L.N.247 of 2018;
2. Requirements as to Advertisements, Methods of Advertising and Directions Applicable to Gambling Advertisements – S.L. 350.25;
3. The Gaming Act;
4. Player Protection Regulations;
5. Consumer Affairs Act.

2. General Marketing Concepts for Malta (MT) including Social Responsibility

1. SuprNation's Commercial communications will be socially responsible, with particular regard to the need to protect minors and other vulnerable persons from harm or exploitation. It shall not in any way advertise or promote a game to persons who are not minors, in a manner that entices, invites, induces, or otherwise targets a minor.
2. SuprNation's Commercial communications will not:
 - i. portray, condone or encourage behaviour that is criminal or socially irresponsible or could lead to financial, social or emotional harm, or directly or indirectly encourage anti-social or violent behaviour;
 - ii. suggest that gaming can be a resolution to social, educational, professional or personal problems;

- iii. suggest that gaming can be an alternative to employment, a solution to financial concerns or a form of financial investment;
- iv. portray gaming as socially attractive or suggest that it can enhance personal and, or professional qualities, for example by improving self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration;
- v. portray gaming in a context of toughness or link it to resilience or recklessness;
- vi. portray gaming as indispensable or as taking priority in life, for example over family, friends or professional or educational commitments;
- vii. suggest that solitary gaming is preferable to social gaming;
- viii. suggest peer pressure to game, or disparage abstention from gaming;
- ix. suggest that skill can influence the outcome of a game that is purely a game of chance;
- x. provide false or untruthful information about the chances of winning or expected return from gaming;
- xi. exploit cultural beliefs or traditions about gaming or luck;
- xii. make reference to instantly available consumer credit services, or any other ways of providing credit to players;
- xiii. tarnish the goodwill and privilege that is associated or related in any manner whatsoever to an authorised person or tarnish the image or reputation of another authorised person.
- xiv. encourages any person to contravene a gaming law;
- xv. shows persons under eighteen years or other vulnerable persons gambling;
- xvi. encourages or targets persons under eighteen years or other vulnerable persons to gamble;
- xvii. is likely to be of particular appeal to persons under eighteen years or other vulnerable persons, especially by reflecting or being associated with youth culture;

- xviii. exploits the susceptibilities, aspirations, credibility, inexperience or lack of knowledge of persons under eighteen years or other vulnerable persons;
- xix. is false or untruthful, particularly about the chances of winning or the expected return to a gambler;
- xx. suggests that gambling is a form of financial investment;
- xxi. portrays, condones or encourages gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm;
- xxii. suggests that skill can influence games that are purely games of chance;
- xxiii. promotes smoking or the abuse of the consumption of alcohol while gambling;
- xxiv. implies that gambling promotes or is required for social acceptance, personal or financial success or the resolution of any economic, social or personal problems;
- xxv. contains endorsements by well-known personalities or celebrities that suggest gambling contributes to their success;
- xxvi. exceeds the limits of decency;
- xxvii. suggests that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression;
- xxviii. portrays gambling as indispensable or as taking priority in life, for example over family, friends or professional or educational commitments;
- xxix. suggests 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;
- xxx. links gambling to seduction, sexual success or enhanced attractiveness.

3. SuprNation's **Educational responsible gaming messaging shall be prominently** included within all commercial communications related to gaming. Example: Play Responsibly.

4. The **web portal address of any entity devoted to responsible gaming** will be carried on all commercial communications and will be presented in a manner which is clearly legible. An example includes:
 - Responsible Gaming Foundation: <https://www.rgf.org.mt/>
 - Gambleaware: <https://www.gambleaware.org/>
 - GamCare: <https://www.gamcare.org.uk/>
 - Gamblers Anonymous: <https://gamblersanonymous.org/>
5. All commercial communications, with the exception of sponsorship, will prominently display, for their entire duration, a sign indicating the minimum age to participate in the game being promoted. I.e. the **+18 sign**.
6. Commercial communications will also clearly display:
 - the name of the relevant authorised person – in our case, this is either “**SuprNation**” or “**SuprPlay Limited**”; and
 - a reference to the entity which issued the relevant authorisation whether such entity is the Authority or the competent authority in the relevant jurisdiction, referring to any relevant authorization reference numbers. These are also required to be available on banners used on websites which are not the licensee’s websites. In practice, this can be **MGA 325/16** (i.e. our licensing authority and the relevant part of our licence number which can be said to be our authorization reference number).
7. No promotional material, including any logos or text, to appear in merchandising **designed for or mainly aimed at minors**.
8. SuprPlay shall not attempt to induce any player to continue playing the authorised games in any manner when such a player has shown the intention to stop the gaming session.

9. No commercial communications may be issued or distributed in any public place, or in or on any means of public transportation in Malta: Provided that such restriction shall not apply to any commercial communications published, displayed or broadcasted within authorised gaming premises, or in any work environment used by an authorised person. This shall not apply to commercial communications which are displayed or distributed in locations frequented mainly by tourists, including airports, seaports, hotels and holiday complexes.

Provided that this shall not include:

- bars and restaurants;
- conferences or events specifically organised in relation to the gaming sector;
- premises of operators;
- premises of organisers or beneficiaries of authorised low-risk games; and (d) newspapers or magazines.

10. SuprNation's Commercial communications will **not**:

- be directed towards minors or vulnerable persons;
- **encourage or target minors or vulnerable persons to play a game;**
- feature minors;
- appeal to minors or vulnerable persons in any way;
- exploit the susceptibilities, aspirations, credibility, inexperience or lack of knowledge of minors or vulnerable persons, or present gaming as a sign of maturity or move to adulthood.
- Be placed on any third-party website which hosts/features any unethical content or illegal services such as illegal streaming or piracy websites, any adult sites including dating websites and similar, or any other websites wherein this would constitute any sort of infringement of law or other private rights of third parties.

11. Commercial communications must be very clear, understandable and factually correct in terms of (including without limitation) bonus, spin and welcome offers plus should ensure that **T&Cs are clear and complete and all significant terms** for participation are highlighted to the player/participant, accordingly, Provided further that:

- Any promotional offers (i.e. schemes purporting to grant any advantage or opportunity to a player):
 - a. must not be misleading; and
 - b. must be clear as to the extent of the commitment the consumer must make to take advantage of any offer; and
 - c. cannot omit or hide material information, or present it in a manner which is unclear, unintelligible or ambiguous; and
 - d. must delineate with sufficient prominence all material information, including wagering and, or deposit requirements which must be fulfilled by a player in order to become entitled thereto, including examples displaying such requirements in an intelligible and easily comprehensible manner, as well as all or any applicable restrictions or other conditions in a clear and unambiguous manner; and
 - e. must include terms and conditions referring to all material information relating to the offer, which shall be expressly agreed to by the players before being enrolled in the offer and must thereafter always be readily available and accessible to the player who has subscribed to the offer.
- It shall be ensured that players can constantly view their progress in fulfilling the requirements in order to benefit from any opportunity or advantage granted by the promotional scheme / offer.
- Where the promotion or advertisement is limited by time or space, it must include as much material information as is practical, and must direct players to an easily

accessible alternative source where all the material information is prominently displayed.

- Where the advertisement is of digital nature, the material information should be displayed no further than one click away from the advertisement itself.

12. For the avoidance of any doubt, any commercial communications displayed by, within or via social media account portals held by Suprnation or third parties acting on behalf of or in collaboration with Suprnation, are subject to this policy in its entirety.

13. Should Suprnation advertise via broadcasting channels, any such activity must strictly comply with the Requirements as to Advertisements, Methods of Advertising, and Directions Applicable to Gambling Advertisements, as well as all other applicable regulations.

14. Should Suprnation advertise via means of sponsorship, such advertisement shall be subject to the following requirements:

- Sponsorship shall be limited to text, logo, or imagery that exclusively identifies Suprnation and shall exclude product placement; and
- Any sponsored organisation, event, or activity, for whatever purpose, shall ensure that the Suprnation logo or imagery clearly indicates Suprnation's identity; and
- In relation to the sponsored party or event, Suprnation shall ensure that it:
 - a. does not exert undue influence over any sporting or other matters, representatives of the sponsored party, or any persons who can influence or who have insider knowledge about the sponsored event; and
 - b. avoids any implication that Suprnation might, as a result of the sponsorship, have involvement in the management of the activities being sponsored; and
- No activities where the majority of the audience is reasonably expected to consist of minors or vulnerable persons, or which have particular appeal to minors or vulnerable persons, shall be sponsored; and

- Sponsorship of minors, or of persons of legal gaming age portrayed as minors, is expressly prohibited, unless the sponsored event is attended primarily by, or teams are composed of, adults, but may include the involvement of one or more minors; and
- Sponsorship of, or advertising in, televised programmes that have, or are expected to have, particular appeal to minors or vulnerable persons is expressly prohibited.

15. Any Marketing communications pursuant to this policy shall be in English. In cases where the communication or advertisement text is not in English, it shall likewise be available in English.

3. Self-Excluded (“SE”) Players and Data Protection & Privacy

1. SuprNation’s Commercial communications will **not target or be sent to players** undergoing a period of **self-exclusion**: Provided that SuprNation has a **maximum of twenty-four (24) hours** from the moment that the player has self-excluded before this regulation becomes applicable.

ACTION POINT = No Marketing material will be sent to any self-excluded players. The marketing team will always check whether a player is SE on any of our sites (i.e. voodoodreams, nyspins, duelz). Note that if a player self-excludes on 1 site, they will automatically be self-excluded for the same duration on our sister sites. Hence no marketing will be sent out to these players, **at least within 24 hours of their having self-excluded**.

2. When direct marketing communications are sent by the Affiliates on behalf of Suprnation, the Affiliates:

- Will NOT send marketing to **self-excluded customers** who have availed of this function via our site/calling up or otherwise communicating with our Support Department;
- Will NOT send marketing to anyone **under 18** or marketing aimed specifically at minors/children;
- Will NOT send marketing to any of our customers with closed accounts (other than for SE or problem gambling issues) without us having their express approval/consent to send these out;
- Will ensure players have **not opted out** from receiving marketing communication and ensure there are **opt-out links with every text/SMS or email** sent out;
- In the case of third parties (not currently players of ours), no marketing is to be sent without **specific and informed consent of that individual**, and opt-out links must also be available per send out assuming consent has already been given and collected and stored accordingly;
- Will follow our **affiliate T&Cs** at all times, whether pertaining to marketing or otherwise.

3. Suprnation shall likewise comply with any GDPR and/or other Data Protection requirements as they concern marketing communications as follows:

- **Suprnation shall not engage in any activity that involves the sending of unsolicited commercial communications, whether it is through its own operation or by the intervention of third parties**
- No marketing will be sent out to third parties (who are not customers of ours) without their **specific and informed consent beforehand**. This is applicable mostly to any of our affiliate partners in that they must ensure valid consent is collected and stored accordingly prior to sending out marketing on our behalf to any third parties.

- SuprNation will not engage in any activity that involves the sending of **unsolicited commercial communications**, whether it is through its own operation or by the intervention of third parties.
- SuprNation will comply with a request by any person to **stop** receiving such commercial communications as soon as is reasonably practicable, and in no case later than **three (3) days** from receipt of the request.
- For our own customers (i.e. players), we likewise rely on specific and informed prior consent as a legal basis for sending direct commercial communication. However, should Suprnation avail itself of the option of **soft-opt in as a** legal basis to send marketing, such approach shall, at all times, comply with the following:
 - a. An **opt-out link 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. Ensure that a **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.
 - c. **If a player has closed their player account (and hence is no longer a customer), we may direct marketing at the player only if the player actively approved such in conjunction with the account closure.**
- Should Suprnation, collect statistical data about players, and, or, groups players based on patterns and demographics and, or other data or metadata, to identify appropriate marketing strategies or player categorisation, it shall not use the data gathered to urge or induce any person fitting the profile of a person with a gaming problem to play. Provided further that, any profiling of players carried out by Suprnation, as a case may be, shall always respect the principles laid down in data protection legislation and be furthermore in accordance with the respective internal

data protection policies, including without limitation the Suprnation Data Protection Policy.

4. Compliance Approval Process - Internal Marketing.

1. SuprPlay intends to conduct advertising and marketing of its business by various means and channels, including without limitation 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 any 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, must be available in English (if marked in a foreign language (i.e. not English/Maltese)) and shall go through an approval process before being published pursuant to this Policy and as further detailed in any internal implementing procedures and/or guidelines.
3. For internal compliance checks and approval processes, this is governed by the Internal marketing Policy as well as any other internal implementing procedures and/or guidelines.

5. Compliance Monitoring and Approval Process - External Marketing.

1. Each Affiliate partner must adhere to our affiliate T&Cs and this policy at all times, whether pertaining to marketing or otherwise.
2. A review process stipulated in the foregoing section 4 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, such as affiliates, media agencies or any other third-party media partner.

3. The Marketing team conducts monitoring checks on affiliate marketing content under MGA. This shall allow the Marketing team to check whether the text, link or image is compliant in accordance with the rules, which have been set up to reflect Maltese law and license 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 as well as all other applicable requirements as further provided in this policy incl. any implementation procedures and guidelines. There shall be also checks for popunders, should this be relevant. Furthermore, regular checks of all SuprPlay affiliates by using keywords to flag content for review shall be carried out.
4. Subsequently, the same approval flow outlined in Section 4 above, as provided in the Internal Marketing Policy, together with any other applicable internal implementing procedures and/or guidelines, shall apply.

6. Employee Training

1. Within an appropriate period following the commencement of employment, relevant employees are to be provided with training to ensure they are aware of the measures, policies, controls, and procedures in force, as further stipulated in the Internal Marketing Policy, as well as any other internal implementing procedures and/or guidelines.
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