UK Marketing Policy & Procedures V2.3
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") are committed to advertising and promoting its services in a socially responsible manner, with a particular focus on ensuring the protection of children, young persons and vulnerable persons. This Marketing 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:

- UK's LCCP, together with the Gambling Industry Code for Socially Responsible Advertising;
- the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Advertising Standard Authority (ASA) and the related Guidance;
- the Broadcast Committee of Advertising Practice (BCAP) as applicable and related Guidance;
- the IGRG (Industry Group for Responsible Gaming) provisions;
- the Consumer Rights Act 2015 provisions;
- Digital Markets, Competition and Consumers Act 2024;
- Social responsibility code provision 3.4.3;
- Social responsibility code provision 5.1.12.

2. Conduct, Applicability, and Compliance Review

SuprNation intends to conduct advertising and marketing of its business through its own channels as well as affiliate websites, TV advertisements, banners, and any other media, channels, and methods the company may, from time to time, decide.

SuprNation complies with the advertising codes of practice, which apply to the form of media in which we advertise our gambling services, and follows all relevant industry codes of practice in advertising.

All marketing, advertisements, and invitations to purchase, including “free play” offers, shall not mislead as defined in the Consumer Protection from Unfair Trading Regulations 2008 (UK) and otherwise ensure that we and any third parties comply in all respects of the Advertising Codes of Practice and the marketing provisions within the Gambling Commission’s LCCP and advertising codes, guidelines.

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.

Internal compliance checks, shall consist of:

1. SuprPlay Marketing Team conducts an initial compliance check referencing the policy herein and any other applicable guidelines.

2. 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).

3. The PML holder shall then give the final approval before any material is published while recording it 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.

Compliance Checks for Affiliate (external) marketing shall consist of:

1. The marketing team shall make necessary checks on affiliate marketing content in the UK.

2. The marketing team shall in particular check whether the text, link or image is compliant in accordance with the rules, which have been set up to reflect UK 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 T&Cs, and so on. They shall also check for popunders should this be relevant.

3. Furthermore, the Affiliate marketing team (incl. Any third party monitoring tools that may be used as a case may be pursuant to a separate procedure) carry out regular checks of all SuprNation/SuprPlay sites and affiliates 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 (our internal tool used to record our approvals for audit purposes).

3. General Marketing Guidelines

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

- Encourage any person to contravene any gambling law or other laws.
- Encourage or target people under 18 years of age to gamble.
- Be false or untruthful, particularly 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. Hence, approaches that give erroneous perceptions of the level of 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 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.
- Appear on any primary web page/screen or microsite that provides advice or information on responsible gambling;
- Unduly pressure the audience to gamble, especially when gambling opportunities are subject to a significant time limitation (e.g. calls to action such as "Bet Now" or "Play Now"); in case there is no time limitation on the offer, such expressions may be used;
- Encourage repetitive or frequent participation;
- Portray or otherwise refers to individuals displaying problem gambling behaviours or other behavioural indicators linked to problem gambling;
- Give an impression that the decision to gamble should be taken lightly.
- Marketing advertisements should target a specific market, such as currency in GBP, English language, etc.

4. Specific Marketing Guidelines

SuprPlay must also ensure that:

- Marketing communications and advertisements do not amount to or involve misleading actions or misleading omissions.
- **All significant conditions** that apply to marketing incentives are provided transparently and prominently to consumers in 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 i.e. there cannot be a statement for the customer to “scroll down” to view the T&Cs. 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 a link to T&Cs one click away or further down (but no scrolling)
- **Terms and conditions** of each marketing incentive must be made available for the full duration of the promotion.
- 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.
- **BeGambleAware logo and link will be shown as per below:**
    - Print Advertising. 'gambleaware' is clearly legible in proportion to the advertising script;
    - Print & Broadcast Advertising. The website address (www.gambleaware.org) is to be carried on all print and broadcast advertising where it is feasible, practical and necessary to do so. The website address is to be presented in such a way that it is clearly legible.
    - Digital Advertising
        - a) 'gambleaware' a minimum of 100px across and needs to be included in the

ad itself (not at the bottom of the affiliate page, for example)

        - b) Website Address www.gambleaware.org is clearly legible in advertisements.

    - Television Advertising. 'gambleaware' to remain on the screen for at least 10% of the advert's length.

- Every television and print advert should clearly carry an '18+' symbol or a 'no under 18's' type message. Also, note that the following marketing ads are likely to be considered irresponsible since they pose a risk to under-18s:

    - Feature under-18s playing a significant role;
    - Are directed at under-18s by being placed in media for that group or any sub-age category (e.g. younger children or teenagers);
    - Address under-18s directly through their content;
    - Otherwise, encourage under-18s directly to engage in potentially harmful behaviour.

- No adverts are present on its website or in third-party media that are:

    - likely to appeal particularly to people aged 17 or younger (‘under 18’); and
    - generally available to view (‘freely accessible’).

- Online Banner Advertising. Where adverts provide click-throughs to further product information, the landing page should provide a further click-through to either:

    - the operator's own responsible gambling microsite or web pages or
    - a generic source of information such as begambleaware.org.

- **Social Media Marketing.** All SuprNation social media marketing channels and ads must be compliant with this Marketing Policy and the applicable regulations. Furthermore, when paid advertisements are used on social media, whether by SuprNation or its partners, they must, in particular, comply with the restrictions on social media marketing as stipulated in this Marketing Policy. In addition:

    - SuprPlay has on its corporate webpages the responsible gambling message.
    - SuprPlay has on its corporate web pages links 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.gambleaware.org – ensure this website address is clearly legible in advertisements.
    - The operator must carry the required social responsibility and age requirements on consumer-facing marketing content on its YouTube channels.
    - The operator uses the Twitter/X age-screening function when marketing to consumers.

- The operator age restricts all direct marketing videos uploaded to YouTube.
- **Direct Marketing & Direct Marketing Preferences.** 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. SuprNation must ensure, and be able to provide evidence, that consent was obtained in accordance with the SR Code (5.1.12 – Direct Marketing Preferences), in particular:
    - SuprNation must provide customers with options to opt-in to direct marketing on a per product (betting, casino, bingo, as applicable) and per channel (phone call, email and text messages (SMS) as applicable) basis;
    - The options must cover all products and channels provided by the licensee and be set to opt-out by default;
    - These options must be offered as part of the registration process and be updateable should customers change their preference;
    - Customers must not receive direct marketing that contravenes their channel or product preferences.
- **Sportsbook Marketing.** Marketing of sportsbook products of SuprNation as may be applicable, is subject to this Marketing Policy in its entirety. The provisions in this section impose additional, sportsbook-specific requirements and do not limit or replace any other obligations under this Marketing Policy. In particular, marketing of the sportsbook product by SuprNation shall:
    - take into account how betting works in practice, particularly where customers can place bets quickly and continuously, such as during live (in-play) events. Because this type of betting can happen very quickly and without much time to reflect, SupNation ensures that all related marketing is designed and delivered in a responsible and measured way.
    - not create pressure on customers to place bets or suggest that they should act quickly, especially during live events where customers may already be more engaged. Communications must not encourage impulsive or repetitive betting behaviour, nor take advantage of real-time developments to prompt reactive decision-making. SuprNation also ensures that marketing messages are not sent too frequently during a single event and remain proportionate and balanced across all channels.
    - Ensure that the customers who are identified as at risk, or who are subject to any restrictions, will not receive sportsbook-related marketing, including live betting communications. This shall be in line with and subject to the SuprNation’s wider responsible gambling and customer protection approach. These principles apply across all marketing channels, including email, social media, advertising, and in-app messages.
    - when referencing odds, enhanced odds, or promotional pricing be clear, accurate,

and not misleading.

  - Ensure that headline offers are not contradicted by underlying terms and conditions;
  - Ensure that any conditions affecting the offer, including minimum odds, qualifying bets, or restrictions, are clearly presented;
  - Ensure that terms such as “free”, “boosted”, or “enhanced” are only used where they accurately reflect the nature of the offer;
  - Ensure that appropriate records shall be maintained to demonstrate the basis of any price or odds-related claims.

- **Television Advertising and Watershed.** No advertising of gambling products on television before the watershed of 9.00 pm. is allowed. This includes sponsorship of television programmes. The exception to this rule is the advertising of sports betting around televised broadcast of live sports events, provided further that:
  - re-watershed television advertising cannot include sign-up offers which are targeted solely at new customers; and
  - pre-watershed television advertising cannot make reference to other gambling products that would not normally qualify for pre 9pm exemption
  - no pre-watershed television betting advertising will be permitted during the period from five minutes before the event begins until five minutes after it concludes. This includes breaks in play, for example, the half time period in a football match. For multiday sporting events, such as Golf tournaments or Test Matches in Cricket, the five-minute period will begin at the start of each day’s activity (ie in these examples there should be no advertising from five minutes before the first Tee off or first ball is bowled). During this ‘five-minute before until five-minute after’ period betting companies cannot sponsor the relevant television programme (this type of sponsorship is commonly referred to as ‘bumper sponsorship). These provisions extend to the linear streaming of a televised live sports broadcast on to mobile devices or similar.
  - Because of their inherent links with betting, which is not the case with other sports, these particular pre-watershed restrictions do not apply to horseracing and greyhound racing.
  - For the avoidance of doubt, where live sports events begin before the 9.00pm watershed but continue after that time then these restrictions apply solely to that part of the broadcast that occurs before 9.00pm. In relation to timeshift channels, that carry a time-delayed rebroadcast of their “parent” channel programming (commonly referred to as +1) these restrictions will not apply if the + broadcast is shown after 9pm.
- Each advert ends with a reminder of the need to act responsibly when gambling, and a responsible gambling message or reference to begambleaware.org must appear on screen throughout the length of the advert.
- **Sports’ Sponsorship.** The advertising of adult-only gambling products or product suppliers should never be targeted at children. This applies equally to sponsorship and gambling

operators can not allow their logos or other promotional material to appear on any commercial merchandising which is designed for use by children. A clear example of this would be the use of logos on children's sports' shirts.

- **Push notifications within the native SuprNation app.** Any marketing compliance requirements pertaining to gambling advertisements as stipulated in this Marketing Policy shall likewise apply to advertisements included or presented within in-app push notifications. Additionally, the following shall specifically apply in the case of push notification marketing:
    - Explicit Consent: Push notifications containing marketing messages are considered direct electronic marketing. They may only be sent to players who have explicitly opted in to receive them (no default-on settings). Players must be clearly informed about the type of messages they will receive and must be able to opt out at any time (both in-app and at device level).
    - Push Notification Block: Push notifications must be blocked for Self-excluded players (including GAMSTOP), Players in time-out / cool-off, Players with closed or suspended accounts, Under-review accounts where play is restricted and Players who have opted out of marketing. System logic must enforce this automatically (no manual overrides).
    - Personal data & account information. Push notifications must not include personal data or sensitive account information, such as full names, contact details, balances, transaction amounts, or KYC/AML status. They should also avoid any responsible gambling flags (e.g. indicating a player is at risk). This is because push notifications can appear on locked screens and may be seen by others, creating data protection and confidentiality risks. Instead, messages should remain high-level and generic (e.g. "your account" or "a new message"), and encourage players to log in securely to view details. For example: "You have a new secure message in your account."
    - Content: Push notifications must not encourage excessive or impulsive gambling, create a sense of urgency (e.g. "last chance" or "hurry"), suggest that gambling can solve financial or personal problems, target vulnerable or at-risk players, or promote bonuses to players who are not eligible. Instead, they should be factual and neutral (e.g. "New game added" or "Maintenance notice"), refer only to promotions the player is eligible for, and include responsible gambling messaging where appropriate.
    - Bonuses & Promotions: If a push notification references a promotion, player eligibility must be checked before sending. Messages must not use misleading headlines or omit key conditions, and the term "free" should only be used where it is genuinely free, with no wagering ambiguity. A clear path to the full terms and conditions must also be provided (e.g. via an in-app landing page).
    - Timing & Frequency: Push notifications should be sent at appropriate times, avoiding late-night or early-morning hours based on risk considerations. Frequency must be capped to prevent pressure or message fatigue, and repeated prompts aimed at reactivating inactive or potentially at-risk players should be avoided.
    - Responsible Gambling Safeguards: Push notifications must not bypass responsible gambling protections. Messages encouraging players to return after losses are not

permitted, and all communications must respect deposit, loss, and session limits. Where appropriate, neutral and non-promotional responsible gambling reminders may be included.

- Data, Audit & Accountability: An audit trail must be maintained for all push notifications, including message content, targeting criteria, send date and time, and audience size. Message templates should be version-controlled, and any new notification types must receive compliance sign-off. The business must also be able to demonstrate compliance if required by the UK Gambling Commission.

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.

5.1. Rewards and Bonuses

In accordance with social responsibility code provision 5.1.1, if a licensee (i.e. SuprPlay) makes available to any customer, or potential customer, an incentive or reward scheme or other arrangement under which a customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the following applies:

1. SuprPlay must:
    - Set out terms and conditions, in relation to an incentive, which are clear, transparent, and fair and readily accessible to any customer or potential customer to whom it is offered.
2. SuprPlay must not:
    - Apply wagering requirements, which requires a customer to play through bonus

funds, over a maximum of 10 times. A wagering requirement is where a customer is required to make wagers totalling a particular value for funds to become withdrawable.

- Include more than one type of gambling product (betting, casino, bingo, and lottery) within an incentive.
- Alter or increase the receipt or the value, or amount of the incentive if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
- Construct incentives where, if the benefit comprises of free or subsidised travel or accommodation which encourages the customer's attendance at a particular licensed premises, it is offered on terms that directly relate to the level of the customer's prospective gambling.

3. Furthermore, if SuprPlay makes available an incentive or reward scheme for customers, designated by the licensee as 'high value, 'VIP' or equivalent, it must be offered in a manner which is consistent with the licensing objectives.
4. SuprPlay must take into account the Commission's guidance on high value customer incentives.

High RG Risk Customers

SuprNation will prevent marketing and the take up of new bonus offers where strong indicators of harm, as defined within the company's RG policy, have been identified. SuprNation will ensure that direct, targeted marketing and the take up of new bonuses will be prevented as soon as practicable. SuprNation will include partial automation in some cases to assist with the timeliness of the response.

The players marked as High Risk for RG are excluded from the off-site and on-site marketing materials as well as excluded from gamification features.

5.2. Self-excluded Customers

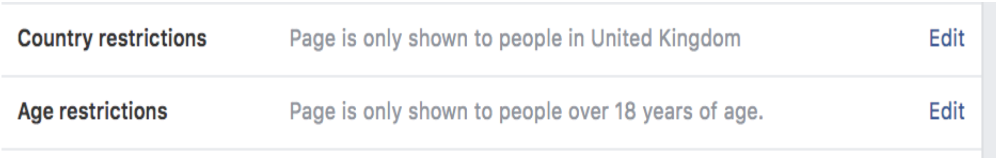
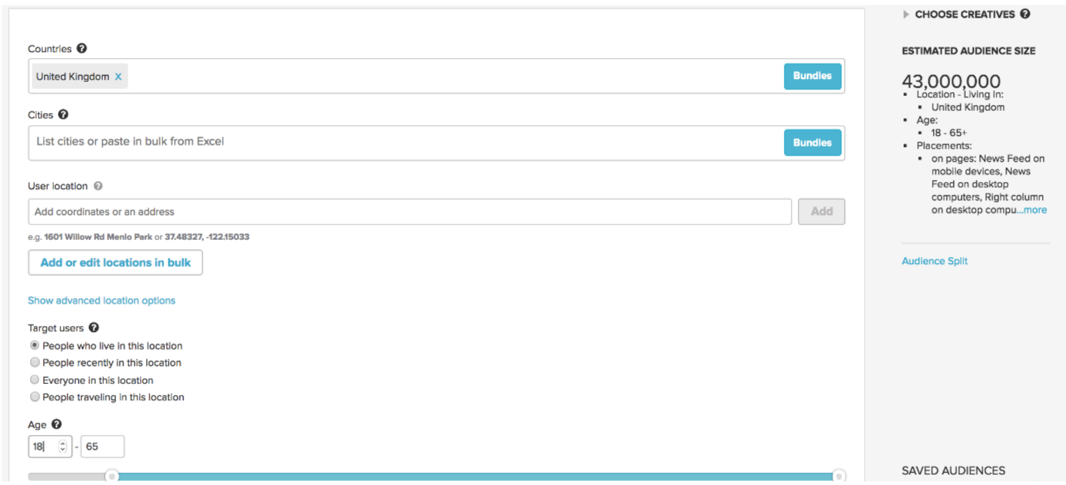
No marketing shall be sent to self-excluded customers.

When a customer self-excludes or is self-excluded on any of SuprNation's websites (voodoodreams.com; nyspins.com; duelz.com) or via GAMSTOP, their names and contact details shall be removed from all marketing databases, and no further marketing shall be sent to such customers, this to take effect within 48 hours maximum, and in any case as promptly as possible.

6. Age Targeting on Social Media Channels

6.1. Facebook

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 “Begambleaware.org “is prominently displayed on the banner image and in the “About” section.
2.	Ensure that you insert the message “18+” and “Begambleaware.org “on every image and post. The gamble-aware message must be a minimum of 100px across.
3.	Select the appropriate targeting settings as displayed below: 
4.	Ensure that that all content to be posted on SuprNation's 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 in the United Kingdom who are above 18 years old. That is to make sure that no one under the age of 18 is exposed to our content. <u>Select the appropriate targeting settings as displayed below:</u>  Apart from restricting underage persons' access to SuprNation Facebook page, these settings will also only target people who actually live in the United Kingdom to ensure that no one who travels to the UK is able to see our ads.

6.2. Instagram

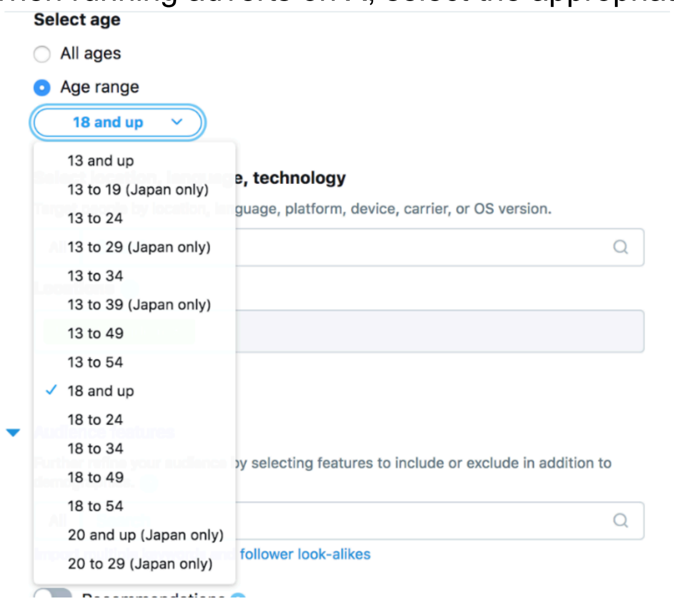
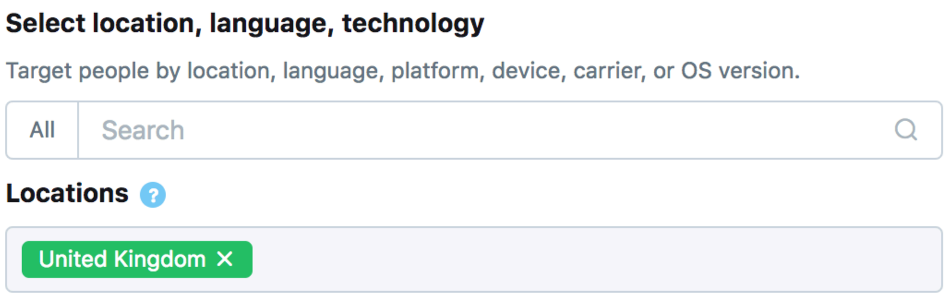
When it comes to Instagram, we are age and country-restricted; it is a part of Facebook's policy, but requires a few steps from us as advertisers. We must ensure that we take those steps in order to be compliant.

Step	Action
1.	All the targeting on Instagram works in exactly the same way as Facebook, as Instagram is owned by Facebook. There, as well as on Instagram, we ensure that we always target people who are above 18. The same process is in place for custom audiences here as for Facebook, as the tools used for marketing on Instagram are the same as on Facebook.
2.	Ensure that a message of “18+” and “Begambleaware.org “is prominently displayed on every page of the post. The gamble-aware message must be a minimum of 100px across.

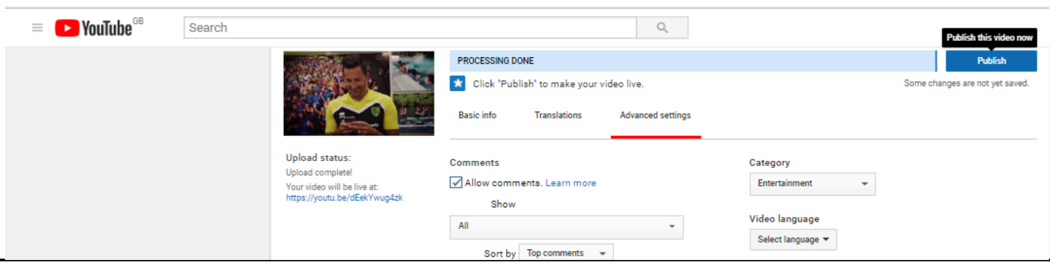
6.3. X (formerly known as Twitter)

On X, at the moment, we do not have the option in the targeting settings to age-restrict the SuprNation X handle, but we must ensure that it is clearly and prominently outlined that this page is not suitable for persons under the age of 18.

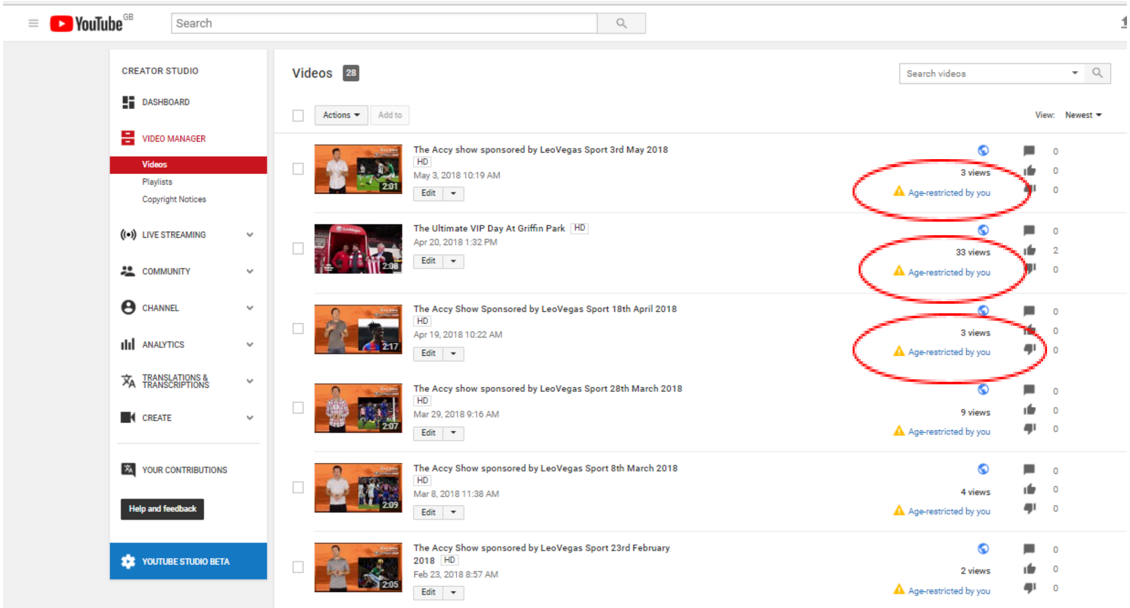
Step	Action
1.	Ensure that a message of “18+” and “Begambleaware.org “is prominently displayed:
2.	Ensure that you insert the message “18+” and “Begambleaware.org “on every image and post. The gamble-aware message must be a minimum of 100px across.
3.	Ensure that individual accounts that reach out to SuprNation via X are monitored. All individual accounts/individual communications under suspicion of being underage must be ignored and blocked.

<table>
<tr><th>Step</th><th>Action</th></tr>
<tr><td>4.</td><td>When running adverts on X, select the appropriate targeting settings as displayed below:

</td></tr>
<tr><td>5.</td><td>Make sure to target persons only within the UK, as displayed below:

</td></tr>
</table>

6.4. YouTube

<table>
<tr><th>Step</th><th>Action</th></tr>
<tr><td>1.</td><td>Ensure that a message of “18+” and “Begambleaware.org “is prominently displayed on the banner image and in the “About” section: The GambleAware message must be a minimum of 100px across.</td></tr>
<tr><td>2.</td><td>Age restrict all direct marketing videos uploaded to YouTube:

</td></tr>
</table>

<table>
<tr><th>Step</th><th>Action</th></tr>
<tr><td>3.</td><td>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.



</td></tr>
</table>

7. CAP Code Rules

7.1. CAP Rule 16.3 – Marketing Prohibitions

SuprPlay's Marketing communications must <u>not:</u>

- 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 their age, assessing factors like their appearance and behaviour in deciding whether the inclusion of a character breaches these rules; 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 on social media news feeds. This rule is, however unlikely to apply to crowd scenes where individuals cannot be easily identified and hence not play 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, SuprPlay 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 with available tools. SuprPlay'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 and 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 strong 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 advergame. 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 Codes. Marketers should ensure affiliates comply with CAP's gambling-specific guidance as well as its more general targeting guidance.

7.3. CAP Guidance – Content likely to be of a strong appeal to children (under 18)

- **"Strong Appeal" Test.** SuprNation must conduct a test on all content to ensure content does not strongly appeal to those under 18, irrespective of its appeal to adults.. SuprNation must satisfy itself to a high degree of confidence that their ad is unlikely to appeal strongly to under-18s before the ad is published. In the event that it investigates a potential breach of this requirement, the ASA will expect to see a detailed assessment as to why the marketer considered the ad would not appeal strongly to under-18s.

- **Licensed characters.** Licensed characters are used by marketers with permission from third parties who own the character. They can be from a films, television, literature and video games; for example, the ASA has ruled on several ads featuring superheroes. 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:

- o the audience and likely appeal of the media from which the character originates;
- o the comic book nature of the character, and
- o 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
  - o characters based on common fairy tales, like Little Red Riding Hood and Hansel and Gretel, and
  - o 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.
  - o 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 characters 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 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 tiles are frequently used on gambling operators' websites and often feature the types of characters listed above. Where such tiles 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. In addition to that, for older individuals, marketers should be cautious about where they are likely to have a significant profile among under-18s or whose example is likely to be followed by those aged under 18 years or who has a strong appeal to those aged under 18, for instance, sports or reality TV stars, as further defined below with respect to persons likely having a strong appeal to under 18s.

- **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.

- **Activities of inherent 'strong' appeal.** Some 'activities' that relate directly to the gambling product advertised are considered to have inherent strong appeal to under-18s and therefore fall under the prohibition unless appropriate steps have been taken to limit the potential for the ad to appeal strongly to under-18s. 13 These activities include:

    - betting ads on subjects like football, eSports popular with under-18s, and certain prominent events in other sports; and

    - ads for certain other gambling or lottery products, like scratchcards or products that have characteristics of online games popular with under-18s and features (gameplay, content and characters) likely to be of 'strong' appeal to under-18s.

    To help meet the requirement to limit the potential for these ads to appeal strongly to under-18s, references to 'activities' that are the subject of the gambling product being advertised must be limited to:

    - Text or audio references to the activity/product

    - Generic depictions of the sport or game

    - Logos of teams/competitions that are subject of a product

    - Advertisers' brand logos/identifiers

- o Lottery prizes and good causes o Limited use of persons or characters who pass the test set out in the guidance (see table below)

- **Use of persons and characters.** SuprNation must carefully consider its casting of persons or characters to ensure that, in addition to being and appearing to be over the age of 25, they are unlikely to have strong appeal to under-18s, including by assessing the following:
  - o roles or activities they are associated with (including potential for them to be viewed in an aspirational or influential way by under-18s);
  - o personal profile and following of the person or character (including by reference to social media follower demographics); and
  - o the audience or audiences for the roles and activities a person or character is known for.
- **High Risk of Strong Appeal of Persons or Characters.** The following summarises scenarios involving the use of persons or characters who are considered to present a high risk of strong appeal to individuals under 18:
  - o Anyone with direct connections to under-18s through their role like children's TV presenters or film stars
  - o Anyone with a significant under-18 following on social media
  - o UK footballers who play for top clubs, UK national teams or in high-profile competitions – this would apply also to managers
  - o Non-UK 'star' footballers and managers with a significant audience in the UK
  - o Other prominent sportspeople involved in non-adult-centric sports, whereby "non-adult-centric" refers to sports in which there is evidence of significant participation or viewership amongst under-18s
  - o Leading eSports players

- **Moderate risk of Strong Appeal of Persons or Characters.** The following summarises scenarios involving the use of persons or characters who are considered to present a moderate risk of strong appeal to individuals under 18:
  - o Footballers from teams outside the top-flight will be assessed on the basis of their social and other media profile
  - o Footballers with lower profiles at top Euro/world clubs might be acceptable
  - o Retired footballers who have moved into punditry/commentary will be assessed on the basis of their social and other media profile.
  - o Other eSports players dependent on their social media and general profile o

  - o Sportspeople involved in clearly adult-centric sports (see below for definition) who are notable ‘stars’ with significant social media and general profiles making them well-known to under-18s
  - o A small but notable following of under-18s on social media will be considered alongside the personality’s general profile and could contribute to an ASA decision to categorise the individual as being of ‘strong’ appeal

- **Low risk of Strong Appeal of Persons or Characters.** The following summarises scenarios involving the use of persons or characters who are considered to present a low risk of strong appeal to individuals under 18:
  - o Footballers at lower league and non-league clubs
  - o Footballers at lesser Euro/world clubs o A long-retired footballer now known for punditry/commentary
  - o Sportspeople involved in sports like cricket, tennis and rugby that don’t have a significant role in the sport or general profile
  - o Sportspeople involved in clearly adult-centric sports, whereby “adult-centric” refers to sports in which there is no evidence of significant participation or viewership amongst under-18s.
- **Targeting exemption.** The ‘strong’ appeal rules are not applied in media where under-18s can, for all intents and purposes, be entirely excluded from the audience of an ad. Principally, this will apply in circumstances where the marketer is able to robustly age verify the potential recipients of the ad as being 18 or older.

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.

Full details on the assessment of strong appeal to under 18s is included in the Guidance on protecting under-18s and shall be followed by the SuprNation (incl. any of its marketing and advertising partners) at all times.

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:

- **How to participate**, including significant conditions and costs, and other major factors reasonably likely to influence consumers' decision or understanding about the promotion
- **Any free-entry route** should be explained clearly and prominently

- **The start date** The start date, if applicable
- **Closing date**
  - 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;
  - 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
  - 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
  - Closing dates must not be changed unless unavoidable circumstances beyond the control of the promoter make it necessary, and either not changing 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. In case there is no start date or closing date, SuprNation will include the duration of the promotion.
- **Proof of purchase:** Any proof of purchase requirements.
- **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.
- **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
- **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.
- **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.

- 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. Links to general terms & conditions and links to bonus terms & conditions are allowed.

7.5. Copy Advice Services Provided by CAP for all Non-Broadcast Marketing

- For pre-publication advice on specific non-broadcast marketing communications, consult the CAP Copy Advice team by telephone at 020 7492 2100, by fax at 020 7404 3404, or you can log a written enquiry via our online request form here: https://www.asa.org.uk/advice-and-resources/bespoke-copy-advice.html

- For advice on specific TV advertisements, please contact Clearcast here: https://www.clearcast.co.uk

- For clearance advice on specific radio advertisements, please contact Radiocentre here: https://www.radiocentre.org/clearance/. Please also note that BCAP Code rule 17.1 requires radio broadcasters to ensure that gambling advertisements are centrally cleared.

- Please also note the Advice & Resources section on the CAP website, where the latest ASA and CAP news may be found here: https://www.asa.org.uk/advice-and-resources.html, including resource library, advice services and training services. In particular, any marketing personnel should complete the training here: https://www.caplearning.org.uk/Gambling_Advertising.

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 UK Marketing Policy & Procedures

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