

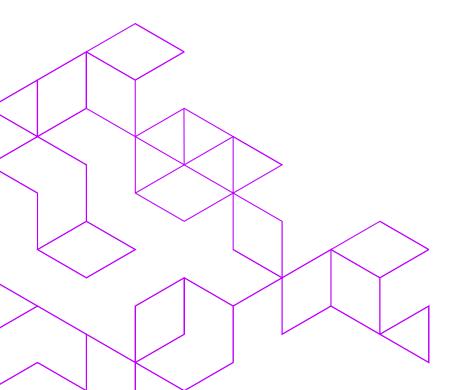
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Copy Advice Team

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INTRODUCTION INTRODUCTION INTRODUCTION INTRODUCTION INTRODUCTION





BRITISH GAMBLING COMMISSION AND GAMBLING LEGISLATION

Great Britain (GB) facing brands are licensed and regulated by the Gambling Commission,

who is responsible for the regulation and operation of the British gambling sector. All British-based operators are required to comply with The Gambling Act 2005 and the Gambling Commission's Licence Conditions and Codes of Practice ('LCCP') in order to maintain an operating licence.

The LCCP requires the advertising of gambling products and services to:

- comply with the Gambling Industry Code for Socially Responsible Advertising; and
- comply with any relevant industry code on Advertising.



GAMBLING LEGISLATION IN NORTHERN IRELAND, JERSEY AND REPUBLIC OF IRELAND

Seeing as the territorial application of the Gambling Act 2005 and the LCCP is not inclusive of any country outside Great Britain (Scotland, England and Wales) it is important to be aware that other countries, in which Entain operates, have separate legislation that governs gambling within that jurisdiction. Information on this, in relation to Northern Ireland (NI), Jersey and the Republic of Ireland, is included in appendices at the end of this document.

1.3

THE UK1 ADVERTISING CODES

The Advertising Standards Authority (ASA) is the UK's independent advertising regulator. It enforces compliance with the Advertising Codes, as written by the Committees of Advertising Practice (CAP), to ensure that all UK advertising remains clear and transparent for the consumer. Advertising in the Republic of Ireland is regulated by the **Advertising Standards Authority for Ireland (ASAI)**. Please see Appendix 3 for specific information on the ASAI.

The ASA investigates any complaint received from the public and adjudicates on whether or not the advertisement is in breach of the regulations. Where such a breach is identified, it will provide the advertiser with a course of action that must be followed to rectify the error.

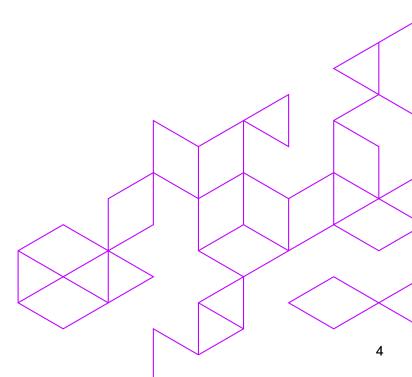
The Advertising Codes cover advertisements across TV, print and online as follows:

- The CAP Code applies to non-broadcast advertisements, sales promotions and direct marketing communications, e.g. newspapers, posters, direct mail leaflets, brochures, 'paid for' online ads like banners, pop-ups, pre-rolls, 'pay per click' ads on search engines (but not the 'natural listings') and 'promoted' social media posts, direct mailings, emails, faxes and SMS/MMS messages.
- Affiliate Marketing: The Code also applies to affiliate marketing in whatever form this may take
 and to promotional marketing in non-broadcast media, including media that might not otherwise
 be covered by the Code, where all the relevant rules will apply to the content. It therefore should
 not, amongst other things, mislead materially or cause serious or widespread offence.
- The BCAP Code applies to broadcast advertisements, e.g. teleshopping, content on selfpromotional television channels, television text and interactive TV ads) and programme sponsorship credits on radio and television services licensed by Ofcom.

Any proposed television advertisement requires primary approval from the Compliance and Legal Teams to ensure the advertisement meets with all other industry guidelines. Secondary approval must be then obtained from Clearcast (the industry body responsible for the pre-approval of broadcast TV adverts in the UK) to ensure compliance with the BCAP Codes.

Radiocentre (previously the RACC), the industry body responsible for the pre-approval of broadcast Radio adverts in the UK, handles the above, but for radio advertisements. Again, primary approval must be obtained from the compliance and legal departments first, before secondary signoff is provided by Radiocentre.

¹For the purposes of this Guidance, the UK includes NI and Channel Islands. Please see the appendices for additional information on NI and Jersey.



GAMBLING INDUSTRY CODE FOR SOCIALLY RESPONSIBLE ADVERTISING

The Industry Code was introduced by the Industry Group for Responsible Gambling (IGRG) to provide gambling operators with a range of measures that would enhance the social responsibility of their advertising.

The Code was proactively volunteered, from its inception, by the gambling industry as a result of the liberalisation of gambling advertising brought about by the implementation of the Gambling Act 2005. A number of precautionary measures were introduced at that time, the most significant of which being the 9.00pm television watershed for all gambling product advertising except for that relating to bingo and sports betting surrounding televised sports events, a requirement for all advertisements to include information leading to the GambleAware website, and a prohibition on sponsoring operators' logos appearing on any children's merchandise.

The latest edition of the Code focuses upon the issue of underage gambling, introducing new measures relating to advertising, designed to limit further the access of under-18s to inappropriate gambling marketing material through search advertising and paid-for social media.

Amongst other requirements, the Industry Code requires operators to comply with the UK Advertising Codes.

Compliance with the Industry Code is an obligatory requirement under Entain's GB operating licence.



1.5 FURTHER INDUSTRY INITIATIVES

1.5.1 The Senet Group Code

The Senet Group, an independent body set up to raise standards in the gambling sector, was founded to support the GB Gambling Commission's work to make gambling services safer and fairer. The Senet Group established their own industry code in 2014 which included advertising elements The Senet Group was recently subsumed by the Betting and Gaming Council (BGC) and as a member of the BGC, Entain have made a commitment to adhere to their code of conduct, which states, upon approval, that the BGC is committed to honouring the existing Codes developed by segments of the industry prior to the formation of the BGC. This includes any previous Code measures by the Association of British Bookmakers, Remote Gambling Association and the Senet Group.

Certain Retail elements of previous codes are not specifically highlighted in the IGRG Code, but Entain do still adhere to them. Examples including no advertising of Gaming Machines in betting shop windows and the requirement to ensure 20% of betting shop window advertising is dedicated to Safer Gambling messaging.

1.5.2 EGBA Code of Conduct

The European Gaming and Betting Association's (EGBA) Code of Conduct has been implemented to enhance consumer and minor protection through the promotion of responsible advertising measures for online gambling.

The Code applies, without prejudice, to the national laws of the UK and the EU/EEA countries where the Online gambling operators provide their services, as well as applicable EU legislation, such as the Unfair Commercial Practices Directive (UCPD), the Directive on Misleading Advertising and the General Data Protection Regulation. The measures in the Code do not prevail over legal requirements. If a local self-regulatory provision goes further than a provision in this Code, Gambling operators must comply with the local self-regulatory provision. Entain have made a commitment to adhere to this code of conduct.

If you have any questions, regarding the interpretations of the above Codes and relevant legal sources, please contact the Legal Team.

If you have any questions regarding compliance of the promotional material with the regulatory requirements, please contact the **Compliance Team**.

GENERAL PRINCIPLES

All promotional material must be **legal**, **decent**, **honest**, **transparent and truthful**. Marketing communications for gambling must be socially responsible, with regard to the need to protect children, young persons and other vulnerable persons from being harmed.

As a business, it is not in our commercial or customer interests to create promotional marketing or advertising that may confuse or mislead. Every effort should be taken to ensure that our marketing is:

- Clear:
- Compliant with the necessary regulations and codes of practice; and
- That the customer experience is in line with what is expected of a responsible operator.



SAFER GAMBLING MESSAGING

It is good practice and a key part of our industry Safer Gambling commitments to include Safer Gambling messaging in all forms of gambling advertisements, and compulsory in the case of broadcast media.

The guidance is not overly prescriptive about what the messaging is, or where it is presented within the advertisement, but to ensure we are consistent across the group, the Safer Gambling message should be displayed at the end of all marketing materials. The following wording should be used in clear legible text:

"18+ | begambleaware.org | "Gamble responsibly"

A Senet Group asset should also be included in the general marketing:



On broadcast advertisements, Safer Gambling messages must be carried regardless of space.

On non-broadcast advertisements, where the marketing is genuinely restricted by space, the Safer Gambling message can be shortened to "18+, T&Cs apply".

Please note that:

- 1. The ASA is unlikely to consider our in-house marketing, which is designed by us or to our instruction, as restricted by space (banners, landing pages, leaflets, headers, posters, etc). This is because such material is fully controlled by us. Examples of genuinely restricted marketing materials would be Tweets, because of the character limit (which, however, can be overcome using an image of the terms and conditions see subparagraph m. on Social Media, Twitter section).
- No advertising or other marketing information must appear on any web pages that solely provide advice or information on safer gambling.



PROMOTIONAL TERMS AND CONDITIONS

Customers must be able to make an informed decision on whether to engage with a promotion, before they are able to engage with it. This means that all promotional material must display the terms that our customers should be aware of.

All terms and conditions must be clear, transparent and written in plain and intelligible language.

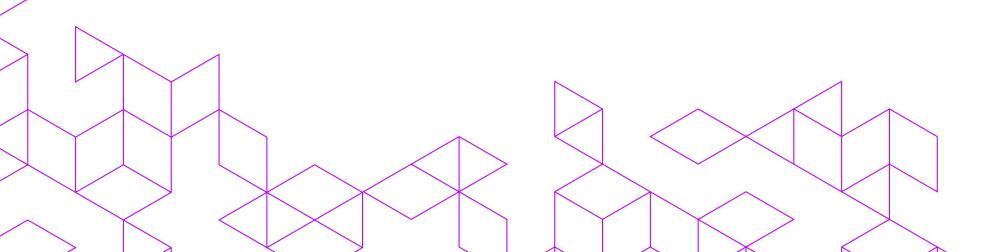
All terms and conditions that relate to a bonus, offer or promotion must be accessible to a customer before they sign up to the applicable bonus, offer or promotion. This includes the promotion specific terms and conditions and any general promotion terms and conditions.

This means that a copy of the full terms and conditions for a bonus, offer or promotion in addition to the significant terms (see section a below) must be included:

- on all landing pages, splash pages and sign up pages for the bonus, offer or promotion;
- on all shop window posters and other in shop posters advertising a bonus, offer or promotion;
- on promotional leaflets and flyers advertising a bonus, offer or promotion;
- within all emails containing a bonus, offer or promotion;
- on any other marketing materials advertising a bonus, offer or promotion where space is available; and
- within a single click from any other form of advertising where it is not possible to include the full terms and conditions on such advertising.*

*Note we can only rely on this exception where space is truly limited, and it is simply not possible to include the full terms and conditions on the offer page.

Full terms and conditions must also be available within a single click from the bonus tab on the customer's account homepage and should be available for the duration of the promotion.



2.2.1 SIGNIFICANT TERMS

The significant terms must be provided **transparently** and **prominently** within the body of the advertisement.

What are Significant (Key) Terms and Conditions?

Significant terms and conditions are those terms which are likely to affect a customer's understanding of the offer, including the restrictions on the offer. The following terms are examples of significant terms:

- 18+
- Promotion dates / end date (e.g. "offer valid from [date X] to [date Y]" or "offer expires within [X] days")
- Restrictions on entry (e.g. country/ new players only / opt-in required);
- Minimum deposit / minimum stake or bet requirements (minimum stake £10)
- Maximum stake sizes (e.g. maximum stake of £10)
- How to qualify for the bonus (e.g. deposit £10);
- Details of any cash-out or wagering restrictions on the bonus;
- Deposit or payment methods restrictions;
- Cap on winnings (e.g. maximum winnings £200);
- Payment methods restrictions;
- Stake not returned (when relevant);
- Type of prize (e.g. free bet, bonus, cash, physical prize, etc)
- Conditions on the prize (e.g. a shared prize pool);
- T&Cs apply.

Please note that: "Money back" offers must be in cash, not bonuses

The significant terms must be provided on all assets (banners, social media posts, sign-up, landing webpages, shop / stadia materials) as follows:

- Transparently this means: in clear, plain English language which is not misleading or ambiguous.
- **Prominently** this means: in proportion to the other writing on the same asset.
- Within the body of the promotional creative asset this means: with the headline offer and before the Call to Action ("CTA").

For example:

If the CTA is displayed within a creative asset, the significant terms must be featured on that asset. Depending on the type/size of creative, they can be located either before or under the CTA - as long as they are in a prominent position. Even if a CTA is not displayed, as long as an offer is present, significant terms will have to be featured within the asset.

In a Digital environment, where it is impossible to include all significant terms due to genuine constraints on time/space, you must provide the key restrictions (for example "18+ New, UK customers only") and a link to the promotion's full terms and conditions (i.e. the promotional landing page). This should, if possible, be hyperlinked in in their own line (e.g. T&CS: http://XXXXXXXXX).

The threshold for impossible is very high and relates solely to constraints imposed by technology and not appearance. Where, for example, there are text limits, multiple numbered texts can be used, as well as graphic images/banners of full T&Cs.

In a Retail environment, where it is impossible to include all significant terms on promotional collateral due to genuine constraints on time/space, you must provide the key restrictions within and cannot rely on a link to them, particularly if the promotion can only be entered in shop. Where there are both in-shop and online entry routes for a particular promotion, is it then permissible to rely on such a link.

Where space restrictions on promotional shop materials (e.g. flyers) prevents the inclusion of the full terms within, a supporting poster must be displayed in shop with the customer signposted to these full terms.

All retail window display promotional posters must include the full terms and conditions within as these are not considered to be 'limited by time and space'.

2.2.2 UNFAIR TERMS

What is an Unfair Term?

A term will be considered unfair if it causes a significant imbalance in the rights and obligations of either us or the customer, to the detriment of the customer. Unfair terms are not enforceable and should not be included.

Our terms and conditions for bonuses, offers and promotions must not include any of the terms below, as these are considered unfair:

- Any restriction placed on a customer's ability to withdraw their own money or any winnings generated from their own money at any time, including when a bonus is still active (unless for legal or regulatory reasons).
- Rewards which would be considered disproportionate to the offer (e.g. bet £100 get £2).
- A right for us to change the terms and conditions of a bonus or promotion at our discretion (we should only make changes where we are required to do so for legal or regulatory reasons).
- A right for us to cancel a bonus or promotion at our discretion where this would result in the removal of a free bet or bonus from a customer's account where the customer has already placed a qualifying bet.
- An obligation on the customer to take part in publicity as a result of entering a prize draw or competition.
- A term deeming the customer to have consented to us using their personal information for promotional purposes as a result of accepting the bonus or promotion.
- The benefit available to the customer must also be proportionate to the type and level of the customers' gambling.

2.2.3 ACCOUNT RESTRICTIONS

In addition to the unfair terms above, you must not enforce an account restriction (e.g. a stake restriction save those who have been applied for the purposes of player protection/safer gambling) against a customer who has already made one or more qualifying bets for a sports free bet promotion where enforcing the account restriction would:

- Affect the customer's ability to receive any of the free bets or the full expected value of the free bets or to complete the wagering requirements; or
- Materially affect the customer's ability to complete the qualifying bets required for the bonus or promotion.

You must highlight this right to customers in all terms and conditions. For example, in relation to restricted funds, consumers must be notified if they are playing with restricted funds and the nature of and consequences of non-compliance with any play restrictions or wagering requirements every time they start a new play, including any time they log into their account after they have paused a game.

Please note that: Simply including the information in the T&Cs (significant or full) is insufficient.

2.2.4 PROMOTIONAL PLAY RESTRICTIONS

For bonuses, offers and promotions containing promotional play restrictions (for example limits or restrictions on the size of a bet, the participating games or specifically invalid patterns of play (such as excluding bets covering 67% or more of the roulette wheel) it is important that the terms and conditions clearly specify all of the restrictions and do not give us sole discretion to determine when play falls within these categories.

Terms and conditions prohibiting account fraud, collusion, cheating or similar must be kept separate from those relating to promotional play restrictions.

2.2.5 WHAT APPROVAL DO I NEED?

All terms and conditions for our bonuses, offers and promotions must be approved by the Compliance Team in accordance with our Marketing Approval Process.

If you need to create terms and conditions for a new bonus, offer, or promotion you should always use one of the templates approved by the Legal Team.

If you cannot find an appropriate template for the type of bonus, offer, or promotion that you are creating, please contact the Compliance Team. The Compliance Team will work with you and the Legal Team to create appropriate terms and conditions for your bonus, offer or promotion.

2.2.6 PRACTICAL EXAMPLE

Banner must show significant terms. Full T&Cs must be displayed on the same page as the promotion offer.



Enjoy a big weekend of sport with a £1 Free Bet!*

Ready for the return of the Premier League? It's back like it never left with some massive games to kick-start the season.

And we're laying on a £1 Free Bet to use on the likes of Leeds v Liverpool, Tottenham v Everton and Arsenal v Fulham this weekend!

Want more? There's top-notch Racing with the St. Leger Stakes at Doncaster and the Irish Champion Stakes at Leopardstown, plus the Tuscan Grand Prix and more from the NBA Playoffs.

Has that whet the appetite? Free Bet available 18:00 (UK Time) on Friday 11th September until 23:59 (UK Time) on Sunday 13th September 2020. Once claimed, it'll be valid for seven days.

Ladbrokes - Where The Nation Plays

BET HERE

TERMS AND CONDITIONS

BEFORE CLAIMING THIS SPORTS PROMOTION IT IS IMPORTANT THAT YOU READ THESE PROMOTIONAL TERMS AND CONDITIONS CAREFULLY AS THEY CONTAIN IMPORTANT INFORMATION ABOUT THE TERMS ON WHICH THIS PROMOTION CAN BE CLAIMED. YOU WILL BE REQUIRED TO AGREE TO THESE PROMOTIONAL TERMS & CONDITIONS WHEN CLAIMING THIS SPORTS PROMOTION. IN PARTICULAR, PLEASE FAMILIARISE YOURSELF WITH THE RESTRICTIONS SUMMARISED BELOW.

These Promotional Terms & Conditions apply to this Sports Promotion. They should be read alongside our General Website Terms & Conditions. These terms can be accessed here.

PROMOTIONAL PERIOD

1. This Sports Promotion is available weekly to qualifying customers from 18:00 Friday 11th September until 23:59 Sunday 13th September 2020 on Ladbrokes.com and the Ladbrokes Mobile App. If we decide to withdraw this Sports Promotion, this will not impact any Qualifying Bets you have placed during the Promotional Period before such withdrawal.

WHO QUALIFIES FOR THIS SPORTS PROMOTION

- 2. This Sports Promotion is open to new and existing customers aged 18 years or over with accounts registered in the UK8/or Republic of Ireland.
- 3. This Sports Promotion is not available to customers who open NEW accounts & depositing funds with Prepaid Cards, Moneybookers, Paypal, Paysafe, Neteller or Skrill.
- 4. Employees of the Promoter, any advertising agency or web company connected with the promoter or any such person's agents or members of their families or households, are not eligible to participate in this Sports Promotion. The Promoter reserves the right to verify the eligibility of all participants.



PROTECTING CHILDREN AND YOUNG PEOPLE

Gambling advertisements must not be targeted at children (0-15) or young persons (16 -17). Ads must not be likely to be of appeal to children or young persons.

This means adverts should not:

- 1. Feature any person who is or looks to be under 25.
 - **Digital advertising** must not show anyone who is or who looks under the age of 25 in a protagonist/prominent role.
 - Retail "point-of-sale" advertising material shouldn't feature individuals who are or look to be under 25 years of age, unless the use of the image has been previously approved by both the Legal and the Compliance Team.
- 2. Be placed in media for under 18s or media outlets where young persons consist of more than 25% of the audience.
 - For example: teen websites, magazines, TV shows.
- 3. Target groups of individuals who are likely to be under 18 years old, based on data about their online interests and browsing behaviour.
- 4. Include content aimed at children and young persons.
 - For example: animated characters and animals, licensed characters from movies or TV of a particular appeal to children; sportspeople and celebrities who are popular in teen and youth culture.

Practical Examples:













2.3 SUBSTANTIATION

Before submitting any marketing communications for publication, we must ensure that we hold evidence to prove our claims, whether direct or implied (e.g. "The biggest bonus on the market" – is it really the biggest bonus on the market, can we prove it? This is different than saying "A fantastic bonus" – which doesn't require any justification).

The requirement might be satisfied with either a sterling (£) justification or a unit/volume justification (numbers).

Comparative claims (e.g. "Better than X", "Faster than Y") require evidence relating to products/services of both parties. Testimonials are not enough to substantiate a claim and it must be supported by independent evidence.

TELEVISION BROADCAST MARKETING



BCAP CODE

The BCAP Code applies to broadcast advertisements (e.g. teleshopping, content on self-promotional television channels, video-sharing platform, television text and interactive tv ads) and programme sponsorship credits on radio and television services licensed by Ofcom.



WATERSHED

What is it? The watershed is the time when TV programmes that might be unsuitable for children can be broadcast.

When is it? In the UK, the watershed begins at 9pm (GMT) and material unsuitable for children (including gambling-related content) should not, in general, be shown before 9pm or after 5.30am.

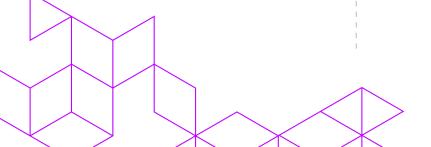
3.2.1 EXCEPTIONS

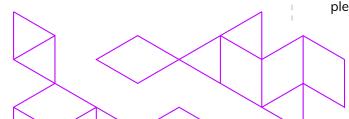
Live sporting events

During televised broadcasts of live sporting events taking place before 9pm, gambling content which doesn't involve new gambling products (sign-up offers that are targeted at new customers) and/or references to any nonsports betting products (these are prohibited before 9pm) can be advertised.

Bingo

Bingo adverts may be broadcast at any time during the day (subject to the Two-click rule, please see subparagraph 3.5 below).





3.3

THE 'WHISTLE-TO-WHISTLE' BAN

There is a ban on all TV betting adverts during live sport coverage before 9pm in the UK, from five minutes before the event begins until five minutes after it finishes. The whistle-to-whistle ban is a requirement of the IGRG industry code that we adhere to as part of our license obligations in the UK.

This ban applies throughout any breaks in between play, e.g. half-time during a football match. This applies to the streaming of a televised live sports broadcast on a mobile device or similar.

If a live sporting event starts before 9pm but continues after 9pm, then the whistle to whistle ban applies to that part of the broadcast that occurs before 9pm. In relation to channels that carry a repeat at a later time, e.g. a+1 channel, these restrictions do not apply if the +1 broadcast is shown after 9pm.

Horseracing and greyhound racing are exempt from the whistle-towhistle ban.

For multi-day sporting events such as cricket or golf, the five-minute period will begin at the start of each day's activity (i.e. there should be no advertising from five minutes before the first tee-off or first ball is bowled etc).

During the whistle-to-whistle ban, we cannot sponsor the relevant live sporting event as a way to get around the in-game advertising ban. The sponsorship of television programmes is classified as advertising.

Furthermore, there is a complete ban on betting advertising of non-live sports broadcasts, such as sport re-runs or highlight show televised before 9pm.

So, when can we advertise before 9pm?

From the beginning of coverage of a live sports event until 5 minutes before the match/sport event starts, 5 minutes after the live match ends, and then until the live coverage ends.

Using an example to outline the above:

Let's say a televised sporting match on Sky Sports is scheduled to kick-off at 3pm on a Saturday. Coverage of the match begins at 2pm with advert breaks at 2.15pm, 2.30pm and 2.45pm and 2.55pm. Before coverage started, there was a rugby highlight show on from 1pm-2pm recapping a Friday night rugby game. The live match starting on Saturday at 3pm ends at 4.30pm and recap commentary commences from 4.30pm-5pm. A non-live sporting event is then shown from 5pm-6pm.

We cannot advertise on the rugby highlight show on TV from 1pm-2pm as it is a highlight show and not a live sporting event. However, upon the commencement of the live sporting event coverage, we can advertise from 2pm-2.55pm and the advert breaks in between. Five minutes before the match starts and until five minutes after it ends, we cannot advertise. Therefore, we can advertise from 4.35pm until 5pm. We cannot advertise after 5pm as the subsequent televised broadcast is not a live sporting event.





THE '9PM TO 5:30AM' RULE

Gambling products may only be advertised on TV between the hours of 9pm and 5.30am AND must not be advertised on a programme which has started before 9pm except cases described above.



BINGO PRE-WATERSHED BROADCAST ADVERTISING

In the UK, Bingo is exempt from the watershed principle and therefore it is permissible to advertise bingo products on TV during the daytime, subject to the two-click rule.

The 'Two-click' Rule:

Pre-watershed bingo advertising is subject to Clearcast's two-click rule. This states that where a bingo product is being advertised during the daytime, the homepage of the website must be entirely free from all other gaming products. Links to other gambling products must be at least two-clicks away from the homepage (meaning that they can then be played following a third click).

Please note that:

- 1. The use of pop-ups prior to the home page will not constitute a click;
- 2. The use of cookies designed to enable returning visitors to see casino games on the home page where they have previously satisfied the two-click rule is not permitted;
- 3. The two-click rule only applies to bingo advertising.



FOOTERS ON TV ADVERTS

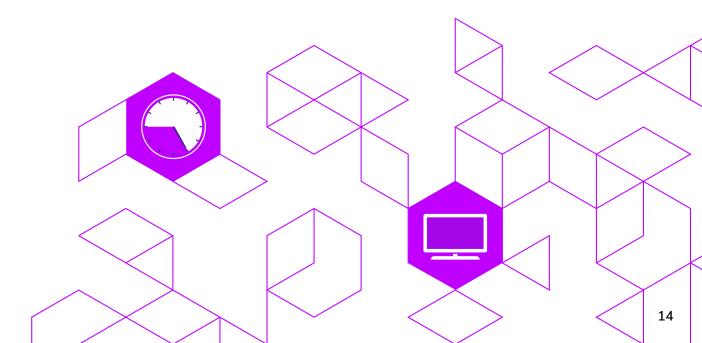
Whilst it is likely to be necessary to include **legal wording** (also known as 'supers') in TV advertising, such text **should be kept to a minimum** in order that it can be easily understood by viewers. If lots of legal text is required to qualify the marketing message, it could be considered that the advert, when taken as a whole, is not compliant with the BCAP code.

Significant terms must be presented clearly. Advertisements must state limitations and qualifications. Qualifications may clarify but must not contradict the claims that they qualify. Text must be clearly legible and in lowercase with upper-case used only for normal punctuation. Where the background obscures the text, it must be placed on an opaque single-coloured block with a clear margin around the text.

The size and position of the text on the screen is determined by the number of television lines which it occupies.

Text must be held at a rate of 5 words per second plus 2 seconds of recognition time. Where text contains 10 words or more an additional 'recognition period' of 3 seconds must be added.

It is a requirement that the messaging in advertising follows the good practice set out in the ASA guidance, On-screen text and subtitling in television advertisement. Copies can be downloaded from: http://www.cap.org.uk/Advice-Training-on-therules/Help-Notes/Onscreen-text-and-subtitling-in-TV-advertisements-note1.aspx#.VOHxPfm5nZY





SAFER GAMBLING MESSAGING AND DISCLAIMERS

3.7.1 Safer Gambling Disclaimer

- Reference to the 'begambleaware.org' website must appear on all broadcast adverts throughout the length of the advert.
- It should be presented in a way which is **clearly legible** (see below in relation to the minimum size of text).
- Where practical, we should consider using the words 'For more information and advice visit www.begambleaware.org'.
- For digital advertising, it should be a minimum of 100px across (For print advertising that it should be clearly legible in proportion to the advertising script).
- As it stands, a Senet Group asset should still be included until such time that the BGC have issued other assets.



3.7.2 Safer Gambling Educational Message

All TV adverts must include an educational message on safer gambling at the end. The message must be prominent. The business generally uses 'Gamble Responsibly' but the following alternatives may also be used:

- Don't let the game play you
- Gaming more than a game
- Bet with your head, but not above it
- If it's no longer fun walk away
- Have fun, but play it safe
- If you play with real dollars, play with real sense
- Winners know when to stop
- Know your limit and play within it
- Please play responsibly Gamble for fun, not to win.

3.7.3 Age Warning (18+)

It is a requirement that every television and print advert should carry clearly '18+' warning or symbol or a 'No under 18s' type message.



3.7.4 Terms and Conditions

Where the advert contains a promotional offer or a call to action of any kind, the significant terms and conditions of that offer must be presented to the consumer at the same time as the call to action whether this is via the graphics, legal text or voice-over. By way of example, such significant terms may include:

- 18+
- Promotion dates / end date:
- Restrictions on entry (e.g. country/ new players / opt-in required);
- Minimum deposit / minimum stake or bet requirements;
- Details of any cash-out or wagering restrictions on the bonus;
- Deposit restrictions;
- Cap on winnings;
- Stake not returned (when relevant);
- Conditions on the prize (e.g. a shared prize pool);
- T&Cs apply.

Care must be taken in every scenario to ensure that all significant terms are provided to the consumer at the appropriate time and that consumers have an opportunity to review the full terms and conditions prior to making their decision as to whether they will participate in the promotion.

To prevent adverts being produced and aired which are not compliant with the various codes, the in-house legal and compliance teams should provide approval of the storyboard and final ads before being sent to Clearcast for approval, as often there is knowledge in the internal team, which a third-party agency may not be aware of.

3.8 CLEARCAST

As above, prior to broadcast, all TV ads must be cleared by Clearcast. This clearance is usually performed by the advertising agency, but for in-house adverts, please contact the Marketing/ Brand team for assistance in submission of the TV ad to Clearcast. If adverts do not receive prior clearance, then these will not be broadcast by a terrestrial TV broadcaster.





In addition to approval by Clearcast, all TV ads must also be sent to the CAP Copy Advice Team for review. The Copy Advice Team will provide any comments or feedback within 24 hours of an ad being submitted. Submission information can be found at the following link: Copy Advice.



RADIO BROADCAST MARKETING

RADIO ADVERTISING CLEARANCE CENTRE ("RACC")

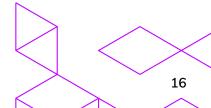
The RACC is commercial radio's advertising clearance body. Commercial radio stations must comply with the conditions of their license to broadcast, granted by Ofcom. These conditions include compliance with the BCAP UK Code of Broadcast Advertising and the Ofcom Broadcasting Code which requires advance central clearance of advertisement and commercial references. If adverts do not receive prior clearance, then a radio broadcaster will not broadcast the advert.

Safer Gambling on the Radio

It is a requirement for advertisers to include (i) a brief safer gambling message which is the same or similar to that used when advertising on TV; or (ii) a voiceover at the end which will refer listeners to www.begambleaware.org. Refer to Appendix 3 for ROI requirements.

Please contact the Compliance team if you have any queries in relation to advertising on the radio.





NON-BROADCAST MARKETING

Non-broadcast marketing includes all marketing communications delivered to the public via the following channels:

- Print media (newspaper/magazine adverts, advertorials, billboard posters, direct snail mail); and
- Online media (banner adverts, SMS, direct email, affiliate advertising (although this is usually carried out by a third party; see below), marketing on Group company websites, blog posts, managed social media posts, paid-for social media advertising and Video on Demand ("VOD") (Terrestrial broadcasters offering VOD marketing services will usually also require Clearcast approval)).
- Shop / stadia items (including promotional flyers, window & in-shop posters, gantry screens, Gaming Machine & BetStation screens, digital marketing screens)



COPY ADVICE TEAM

The CAP Code sets out general rules which must be adhered to when marketing using non-broadcast advertising. There are general rules which all adverts must comply with and there are specific rules in relation to gambling advertising.

It is also worth noting that the CAP Code and BCAP Code are almost identical, therefore, the standards required for broadcast marketing and non-broadcast marketing are very similar.



IMPULSIVENESS AND URGENCY

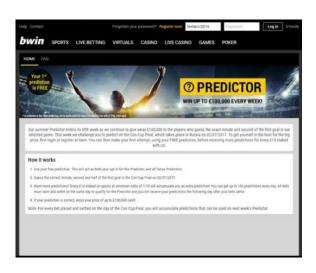
In order not to encourage harmful gambling behaviour, our communications must not unduly pressure or encourage players to gamble, especially when gambling opportunities offered are subject to a significant time limitation.

Offers subject to significant time limits and promotions with short term expiry dates should not be presented in such a way that creates an unjustifiable sense of urgency ("Time is running out!", "Bet now!"). In such instances, urgent calls to action that place emphasis on time running out, are likely to be regarded by the ASA as a breach of these rules. Reminding consumers that other time-limited promotional offers are due to expire is likely to be acceptable



COPY ADVICE TEAM

Promotional landing pages are the best opportunity to provide consumers with all of the relevant details of the offer, along with the full promotional terms and conditions. Generally, a promotional landing page will consist of a key visual, a promotion headline, some copy text and the significant terms and conditions and the full terms and conditions, the following point should also be noted:



- Promotional landing pages should be at most one-click away from all banners / emails / notifications / posts / tweets relating to that promotion.
- The full terms and conditions of a promotion must be clearly visible on the promotional landing page and cannot be hidden behind a further link / dropdown menu / expand button.
- As with the general principles stated above any significant terms and conditions should be stated alongside the marketing headline / call to action. Therefore, the key visual at the top of the promotional page

5.4

LINE BANNER ADVERTISING

The phrase 'banner ads' includes a wide range of media assets, in a variety of sizes and formats. As with the general principles stated above, significant terms and conditions must be stated alongside any headline marketing offer or promotion and full terms, where space is limited, should be, at most one-click away. Terms and conditions must be accessible. Only in cases where the size of the media is genuinely restrictive can a substitute such as '18+ See Terms' or '18+ T&Cs Apply' be used. In any event, guidance should be sought from Compliance regarding shorter terms.

Banner ads must provide a link through to the promotional landing page where further details of the promotion are provided along with the full terms and conditions.

If a banner invites a consumer to sign-up/register the user must first be directed to a promotional landing page where the promotional terms are available before the registration page.

Regarding the safer gambling messaging, it is not possible or appropriate to require that ALL online banner advertising should carry safer gambling messaging, but it is not unusual for such adverts to provide click-throughs to further product information.

Therefore, where this happens, the landing page should provide a further click through to either (i) the brand's own safer gambling microsite or web pages; or (ii) a generic source of information such as www.begambleaware.org For the avoidance of doubt this provision does not apply to banner advertising on gambling websites themselves, because they already provide links to safer gambling information.

5.4.1 Responsible Placement of Digital Advertising

Banner ads must not be placed on websites which include copyright infringing content and any agreements with media partners or affiliates must include a termination right where that partner posts content on copyright infringing sites. More details of the City Of London Police's Intellectual Property Crime Unit's Infringing Website List can be found at: https://iabuk.net/policy/briefings/theinfringing-website-list-iwl.

Banner Examples:





5.5 EMAIL / ACCOUNT INBOX

Email marketing should only be sent to those customers who have set up an account and who have agreed to receive such marketing.

It is a requirement to include the following in all emails to players:

- Our full contact details name, registered company number, registered address, licence number, VAT number (if applicable).
- A link to our Privacy Policy.
- The player must be given the opportunity to unsubscribe via a link contained in the email.
- All promotional banners (or text) should include the significant terms.
- Full terms should be available at the bottom of the email, before the footer.

5.5.1 Footer (email only)

We are also required to insert a footer at the bottom of the email. The footer must contain the following information:

- Reference to the website www.begambleaware.org should appear in the footer. Where practical we should consider using the wording: 'For more information and advice visit www.begambleaware.org'.
- Reference to our self-exclusion controls, time and deposit limits.
- Regulator notices (wording prescribed by the regulator who grants the licence).
- Responsible gaming logos.
- iTech testing logos.
- Educational message "18+, Play Responsibly"

Please see example below:

You have received this email because you are a player at www.partycasino.com and have agreed to receive promotional emails. If you wish to change your email preferences, please update your message settings.

We provide self-exclusion controls, time and deposit limits - we know our limits and encourage our customers to know theirs. We strictly prohibit gaming by children and young people and do not market to under 18s.

Please play responsibly. For more information and advice visit http://www.begambleaware.org.

To ensure you continue to receive emails, please add promo@bwin.com to your address list. For more information about our Privacy Policy and to report abuse complaints or other issues, please refer to the Privacy Policy page or contact us by email or by post at: ElectraWorks Limited, Suite 6, Atlantic Suites, Europort Avenue, Gibraltar.

ElectraWorks Limited is licensed by the Government of Gibraltar and regulated by the Gibraltar Gambling Commissioner under the Gambling Act 2005. ElectraWorks Limited has been granted a fixed-odds licence (RGL No. 051) and casino licence (RGL No. 50) for the operation of remote gambling.

Furthermore, ElectraWorks Limited is licensed by the UK Gambling Commission under the Gambling (Licensing and Advertising) Act 2014. ElectraWorks Limited has been granted License No. 000-039011-R-319371-004 for the operation of remote gambling in Britain.



BeGamble**Aware**



GAMBLING COMMISSION



Please note that:

Requirements may vary for different jurisdictions, therefore, please ensure that the Legal team review any footers which are to be included in emails to players.

5.6 PRIZE DRAWS

Before proceeding with a prize draw, marketers should seek advice from the Legal and Compliance Department to ensure that they are not running an unlawful lottery. A prize promotion could, for example, be considered an unlawful lottery if participants are required to pay to enter. According to the ASA, marketers can charge for entry to a prize competition BUT if customers have to pay a price and the competition does not involve some level of difficulty, it will be treated as a "process that relies wholly on chance", and therefore classed as a lottery.

There are various types of prize draws, such as:

- Traditional "prize draws", where the winner is chosen at random from all valid entries returned by participants; and
- "Instant wins" where winning tickets are randomly and securely distributed in or on promoted products
 and customers get their winnings at once or know immediately what they have won and how to claim it
 without delay.

Significant conditions to enter the prize draw (e.g. company details, draw start date, closing date, how to participate, age and geographical restrictions, when and how winners will be contacted) should be given prominence and be accessible before or at the time of entry/application.

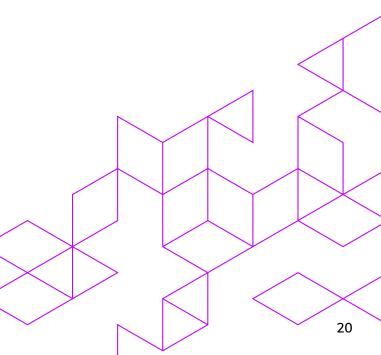
We should also ensure that prizes are awarded in accordance with the laws of chance. If a verifiably random computer process is used, we could be requested evidence of this. If such a computer programme has not been used, winners must be selected under the supervision of an independent observer.

We must specify the number and nature of prizes or gifts. If the exact number cannot be predetermined, a reasonable estimate of the number and a statement of their nature must be made.

Prize-winners should receive their prize within 30 days and we should make all reasonable efforts to contact the winner. Phoning a winner once will not be considered sufficient.

We should not overstate customers' chances of winning prizes, claim that customers are luckier than they are by, for example, using words like "finalist" or similar. Promotions where consumers incur a cost to claim a prize are prohibited.

Besides prize draws, there are a number of other promotional mechanics such as raffles, prize competitions and sweepstakes which all have nuances from a regulatory perspective. Before proceeding with any such mechanic seek approval from Compliance.





SEO / PPC

Search engine marketing must align with the general principles stated above and where promotional offers are being advertised, link through to a promotional landing page where the full terms and conditions are available. Any search advertisements must clearly contain 18+ messaging in the ad copy, along with safer gambling messaging within the core ad format.

Whilst it is acceptable to bid on a competitor's key words, any registered trademarks of third parties should not be used in either the headline or copy text.

In order to ensure an enhanced level of consumer protection, the industry will introduce a shared blacklist of negative keywords against which no gambling advertising should be served. This blacklist will include keywords which indicate vulnerability and keywords which relate to children amongst others. The industry keyword blacklist will be updated on a regular basis. Operators are expected to incorporate the industry keyword blacklist into all relevant campaigns where applicable.

5.8

MOBILE APPS / PUSH / TEXT MESSAGIING

Marketing communication through mobile websites and applications is far more restricted by space than through other channels. However, every effort must be made to adhere to the general principles set out above and where, for example, there are limits, multiple numbered texts can be used.

Where using responsive webpages, which change dimension depending on the screen size of a device, every effort must be made to ensure that full promotional terms and conditions are available on a promotional landing page.

Push notifications and in-app messages are more limited by space but where possible, '18+ T&Cs' should be included on the message and then clicking the link should navigate to the promotion page.

Text messages must include the ability for a user to unsubscribe from messages, e.g.: "text STOP to..."

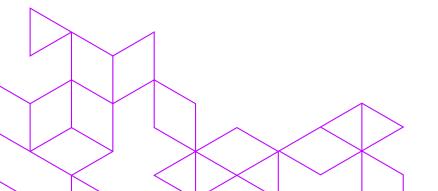


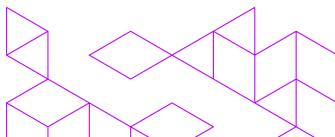
DIRECT MAIL

Direct Mail marketing should only be sent to those customers who have set up an account and which have agreed to receive such marketing. Furthermore the list of recipients must be pre-screened against the Marketing Preference Service (http://www.mpsonline.org.uk/mpsr/), which is a list of persons who have opted out of receiving commercial correspondence by way of post and telephone.

Direct mail must adhere to the general principles set out above. Providing a URL to a promotional landing page is unlikely to be enough to make users aware of key promotional terms and conditions, so key terms must be included on the mailer itself with further information which tells customers where they can find further information.

The full contact details of the sender – name, registered company number, registered address, licence number, VAT number (if applicable) should be included in the mailer. Information about how a customer can change their marketing preferences/unsubscribe should also be made available.





5.10 AFFILIATES

Entain is responsible for the marketing carried out by its affiliates as if it were its own activity. Therefore, unless agreed in writing and approved by the relevant Head of Brand, all affiliate relationships must be governed by the standard terms and conditions of our affiliate platforms. Such terms give us the ability to terminate the affiliate which carry out marketing which is not compliant with the regulations.

We must ensure that we have a signed contract on terms approved by the Legal Team with any third-party providing marketing services for us.

Affiliates carrying out marketing on our behalf, or those affiliates provided with our marketing materials or bespoke promotions to carry out marketing activity, must adhere to these guidelines without exception. Where an affiliate is known to be carrying out marketing activity which contravenes these terms, immediate action must be taken to rectify the breach and where necessary to terminate the affiliate.



VIDEO-ON-DEMAND (VOD)

Marketing via VOD channels is caught by the CAP code, as opposed to the BCAP code, however any terrestrial broadcasters will still require Clearcast approval before permitting an advert to be broadcast via a VOD platform. Therefore, it is best practice to ensure that all VOD marketing adheres to the guidelines on TV advertising as set out above.



APP STORES

Where promotional offers are advertised in an app store, this will constitute marketing and should therefore adhere to the general principles. The app description should therefore also include the key terms of the relevant offer being presented and a URL link should be provided to a promotional landing page.



5.13 SOCIAL MEDIA

Social media channels offer a unique opportunity for a brand to engage directly with its audience, however, all content which is hosted on a publicly available page and published by a brand is likely to be considered marketing material. Therefore, despite the tone of the marketing being more conversational, posts or conversations in the public domain must adhere to the general principles, as set out above.

We should have on our corporate webpages:

- · Responsible gambling messaging; and
- Links through to sources of more detailed information.

All social media pages for gaming brands must be technically limited to an adult audience and include the responsible gambling messaging in the page description "18+ | begambleaware.org | Play Responsibly". Sponsored/paid-for social media advertisements must be targeted at consumers aged 25+.

5.13.1 Social Media Adverts

Some social media channels restrict the amount of text which can be included on an image, in these circumstances it may be acceptable to not include significant promotional terms in the key visual, however, in this instance the significant terms and the responsible gaming message must be included in the text of the post and must link through to a promotional landing page.

5.13.2 Influencers

When using Influencers to advertise, certain criteria must be met. Where users self-report age on a platform, such as Instagram, Influencers must confirm an audience of 75% or more over 18 and targeting criteria and age gating for over 18s must be adhered to. Any Influencer found in breach of these criteria will be prohibited from advertising our brands.

Any posts or content shared by Influencers in respect of our brands will be considered advertising and the CAP Code and other advertising rules will apply to such posts and content. We are responsible for our Influencers in the same way we are with our affiliates. We must ensure to provide guidance to Influencers and ideally approve all posts and content related to our brands.

5.13.3 Advertorials

It is important that individuals are able to identify any marketing communications are advertorials.

Where we give some form of payment and we have some control over the content (e.g. right of final approval, restrictions on what should or shouldn't be included), the commercial nature of the content must be made clear to customers.

This can be achieved by using "ad", "advert", "#ad" or "advertisement". We must not use "#spon" or "#sponsored".



5.13.4 Hosted Pages & Posts

Content appearing on a brand's own feed may include a mixture of editorial content, brand posts and marketing materials.

If the advert appearing on Facebook is editorial and there is no reference to a promotion, then there is no requirement for the advert to bear a health warning on the post as this is covered by the information in the page description:



5.13.5 YouTube

- We must include the mandatory social responsibility and age requirements warnings on consumer-facing marketing content on YouTube channels.
- We must age restrict all direct marketing video uploads to YouTube. This can be done simply by 'checking' the age restriction option when uploading content via: https://support.google.com/youtube/ answers/2950063?rd=1

5.13.6 Twitter

- We must use the Twitter age-screening function when marketing to consumers.
 This approach was piloted by the alcohol industry and adds another safeguard in the push to ensure that under-18s do not receive inappropriate content.
- A short link to the full terms and conditions should also be included in the tweet itself (a hyperlink from the text 'T&Cs' for example). Alternatively, an image of terms and conditions could be included, avoiding Twitter's character limit.

5.14

SHOP / STADIA MATERIALS

Entain operates a significant Retail estate of over 3,000 shops in the UK and Ireland and due to its high visibility and presence on the high street any advertising or marketing used must comply with all applicable codes. Notable Retail specific items worth calling out are:

- No advertising of Gaming Machines in betting shop windows
- 20% of betting shop window advertising to be dedicated to Safer Gambling messaging
- T&Cs must be displayed in a font size that is clearly visible to the customer
- Full promotional T&C's must be displayed on betting shop window advertising
- You cannot rely on a link to display full T&Cs unless the shop promotion can also be entered online
- Where space restrictions on promotional shop materials (e.g. flyers) prevents the inclusion of the full terms within, a supporting poster must be displayed in shop with the customer signposted to it



SPORT SPONSORSHIP AND PERIMETER ADVERT BAN

The advertising of adult-only gambling products or product suppliers should never be targeted at children. This applies equally to sponsorship and we do not allow 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. Children's shirts and other merchandise will be defined as those that do not attract VAT.

Please note Entain has committed to unilaterally ending all football shirt sponsorship deals with UK teams and banning perimeter board advertising at football grounds, to allow sporting fans to watch their favourite teams without seeing any incentives to bet. Entain has called on its industry peers and UK football governing bodies to support this move and take similar action in this area.

APPENDIX 1: ADVERTISING IN NORTHERN IRELAND

In Northern Ireland, The Betting, Gaming, Lotteries & Amusements (NI) Order 1985 governs gambling activities. "The order" is becoming increasingly out of date and is currently under review, so as it stands, it does not consider marketing or advertising in any great detail, or make reference to compliance with Socially responsible advertising, Industry codes or UK advertising codes.

Although the Advertising standards Authority regulates the whole of the UK, NI included, they do specifically state that "Specialist legal advice should be sought when considering advertising any gambling product in Northern Ireland".

In practise, the Compliance/Legal teams will sign off marketing for Great Britain. The marketing department in Dublin may then choose to amend for the NI and ROI markets.

As considered above in section 2, there are legal sensitivities around advertising in Northern Ireland, meaning that all NI marketing should be cleared by the legal department before circulation is permitted.

When proposing or creating marketing material for this jurisdiction, the following points should be recognised before submission to the legal department for clearance.

In NI, an advertiser is prohibited from:

"inviting the public to subscribe any money or money's worth to be used in gaming whether in Northern Ireland or elsewhere, or to apply for information about facilities for subscribing any money or money's worth to be so used".

Any form of advertising which invites the public (in Northern Ireland) to pay money for use in gaming or to apply for information about doing so, is prohibited. This includes the advertising of both remote and non-remote gaming, wherever that gaming is based and/or licensed.

What does "inviting" mean?

The concept of "inviting" the public includes any inducement to pay money for gaming. As a general rule, advertisements should focus on the thrill, excitement, passion, etc. of participating in the gaming, while avoiding references to anything more financially explicit. References to money (cash, prizes, winnings, dollars, stakes, pounds, jackpots, etc.) should be avoided, as they indicate an intention of inviting people to subscribe (i.e. pay) money.

Offering a bonus or benefit for subscribing money for use in gaming is a form of invitation.

Reference to a "free entry" or "play for free" could amount to an indirect invitation to subscribe for money, etc. (in particular if when the player goes to the play-for free website there are direct exhortations to play for real money).

Exception to the rules:

There is one exception to the above rules. An operator can offer free (bonus) chips in an advert provided that the advert expressly states, "No deposit required", e.g.:

Join today and get a bonus (no deposit required); £20 free chips on registration (no deposit required); £150 free for all new players (no deposit required).

APPENDIX 2: ADVERTISING IN JERSEY

The Jersey Gambling Commission requires advertisements to comply, both, with their own guidance in relation to advertising, as well as the guidance of the Advertising Standard Agency in the UK.

There are particular parts of The Gambling (Jersey) Law 2012 and Jersey Gambling Commission guidance that are worth highlighting here:

- Ladbrokes (Channel Islands) Limited may only advertise activities if it is licensed to do so within Jersey.
- Ladbroke (Channel Islands) Limited can advertise its online services inside our shops but not on shop windows.
- Shop window posters that are predominately focused on The Grid or where betting with The Grid is the main focus of the ad, should not be displayed.
- Shop window posters, where betting with The Grid is mentioned but the ad is predominately focused on in-shop betting, can be displayed.
- Shop window posters, that solely advertise our online services such as Ladbrokes.com or Ladbrokes.co.uk, should not be displayed.

More widely, Ladbrokes Digital cannot target Jersey in any media specifically directed at the island. TV or national newspapers carrying gambling content that is not usually meant for or specifically targeted at the Jersey market (e.g. ITV, Sky, The Sun, Daily Mirror, etc.), is excluded from this rule. Websites not principally intended for use by persons in Jersey will not be considered as directly targeting the Island's public.

APPENDIX 3: ADVERTISING IN THE REPUBLIC OF IRELAND

The Advertising Standards Authority for Ireland (ASAI) is the independent self-regulatory body set up and financed by the advertising industry and committed, in the public interest, to promoting the highest standards of marketing communications, that is, advertising, promotional marketing and direct marketing. The objective is to ensure that all commercial marketing communications are 'legal, decent, honest and truthful'. The rules are set out in the Code of Standards for Advertising and Marketing Communications in Ireland, drawn up by the Board of ASAI following detailed consultation with all relevant interests including the public, advertisers, agencies and media, consumer representatives and Government Departments.

Standards broadly mirror UK standards and include:

- Marketing communications for gambling services or products shall contain a message to encourage responsible gambling and shall direct people to a source of information about gambling and gambling responsibly.
- Marketing communications for gambling should not:
- 1. Portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.
- 2. Suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression.
- State or suggest that gambling may be a way to solve financial or personal issues or represent it as an alternative source of income or substitution for working.
- 4. Portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments.
- 5. Suggest that gambling can enhance personal qualities including for example, that it might improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration.
- 6. Suggest peer pressure to gamble or disparage abstention from gambling.
- 7. Link gambling to seduction, sexual success or enhanced attractiveness.
- Portray gambling in a context of toughness or link it to resilience or recklessness.
- 9. Suggest gambling is a rite of passage.
- 10. Suggest that solitary gambling is preferable to social gambling.
- 11. State or imply a promise of winning or portray unrealistic outcomes.

- Winning claims, success rate claims and profitability claims should be factual and capable of substantiation. Neither the chances of winning nor the size of the prize should be exaggerated.
- Marketing communications should not state or imply that a player's skill
 can influence the outcome of a game unless the skill can actually be
 demonstrated to affect the outcome of the game.
- Marketing communications for events or facilities that can be accessed only by entering gambling premises, should make that condition clear.

Children:

- Marketing communications should not harm or exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of children.
- Marketing communications should not:
- 1. Be likely to be of particular appeal to children, especially by reflecting or being associated with youth culture.
- 2. Make direct use of signs, symbols, drawings, fictitious characters or real people of primary or particular appeal to children.
- 3. Depict adolescent, juvenile or loutish behaviour.
- 4. Contain endorsements by recognisable figures who would be regarded as heroes or heroines of the young.
- 5. Feature children, except in an incidental manner.
- 6. Feature anyone who is, or seems to be, under 25 (18-24) years old, unless those individuals feature only to illustrate specific betting selections or options where that individual is:
 - the subject of the bet offered,
 - is in a team that is the subject of the bet offered, or
 - is part of an event which is the subject of a bet offered.
- 7. The image or other depiction used must show them in the context of the bet and not in any gambling role.
- 8. Be directed at those aged below 18 years through the selection of media or context in which they appear, or be placed in or through media, or parts of media, that are specifically intended for children (inserts, supplements, special (radio and TV) programmes, cinema films, etc.).
- 9. Be displayed within 100 meters of a school entrance.
- 10. Induce a child to regard gambling as a natural element of his or her leisure time/activities.

