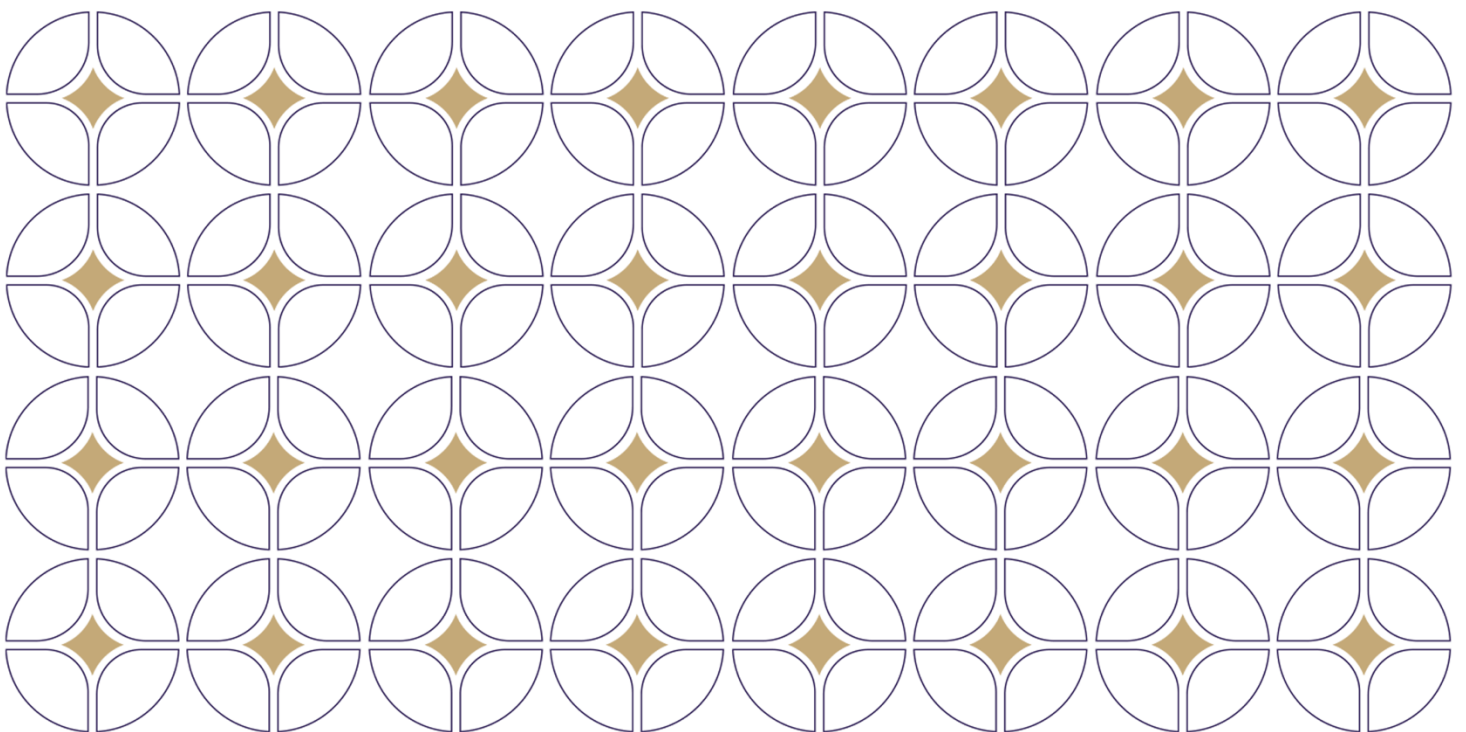


GCGRA Advertising Standards for Commercial Gaming



General Commercial Gaming Regulatory Authority Advertising Standards for Commercial Gaming

General Standards

1. Definitions

1.1. For the purpose of this Advertising Standards:

- 1.1.1. “Advertising” or “Advertisement/s” is any means of communication that aims to, either directly or indirectly, promote Commercial Gaming;
- 1.1.2. “Commercial Gaming” means any game of chance or any other game relying on chance and skill in which an amount of money, in cash or cash equivalents, is placed as a bet for the purpose of winning an amount of money or any other valuable item from or in the territory of United Arab Emirates;
- 1.1.3. “Direct Marketing” means the direct advertising and marketing of inducements, bonuses and credits to individual consumers. This includes but is not limited to:
 - 1.1.3.1. emails, texts, phone calls, and messaging via social media; and
 - 1.1.3.2. communications to consumers based on pre-defined customer profiles that are used to target specific market segments or consumer characteristics;
- 1.1.4. “GCGRA” is the General Commercial Gaming Regulatory Authority;
- 1.1.5. “Involuntarily-Excluded Player” means any Individual who has been on the Involuntary-Exclusion List and who is prohibited from establishing a Player Account or participating in Commercial Gaming, or both;
- 1.1.6. “Operator” or “Operators” means any legal person licensed by the GCGRA to offer Commercial Gaming ;
- 1.1.7. “Product Placement” includes:
 - 1.1.7.1. marketing strategies where branded goods or services are placed in a context usually devoid of advertisements, such as movies, TV shows, music videos, or news programs; and
 - 1.1.7.2. techniques designed to promote products subtly while integrating them into an entertainment content’s storyline or setting, thereby influencing viewers in a less overt manner than traditional advertising methods;
- 1.1.8. “Promotional Marketing” means any incentive offered to the public by providing added direct or indirect benefits, usually for a limited time, to make a product more appealing;

- 1.1.9. "Recipient" is the natural or legal person to whom the Advertising is addressed or who is in any way affected by it;
- 1.1.10. "Self-excluded Player" means any Recipient that is excluded from legally participating in Commercial Gaming in the UAE pursuant to a voluntary self-exclusion agreement with a Gaming Operator or the GCGRA;
- 1.1.11. "Sponsorship" includes but is not limited to the advertising of Sports Jerseys; Sports teams; E-sports teams; Global brand partnerships; Ambassadors; Press conferences; Stadiums or other sporting venues;
- 1.1.12. "Third-parties" means any natural or legal person that is by any means contracted by an Operator for Advertising purposes;
- 1.1.13. "UAE" are the United Arab Emirates;
- 1.1.14. "Underage Person/s" means any individual/s under the age of 18 years for lottery-related activities or under the age of 21 years for all other types of Commercial Gaming activities;
- 1.1.15. "Vulnerable Person/s" means any individual/s with a gaming addiction or other susceptibility to gaming-related harm.

2. Scope

These Advertising Standards complement the provisions of Chapter 17 of the GCGRA's Executive Regulation and establish the minimum standards for Advertising in the UAE and are aimed at Operators, who are responsible for being aware and complying with them.

3. General Provisions

3.1. Regardless of the means used for its promotion, when conducting Advertising, Operators shall observe the following standards as a minimum:

- 3.1.1. Clear, intelligible, and timely information without ambiguity or concealment must be provided;
- 3.1.2. Recipients must be provided with all the necessary information to help them make informed decisions about the product. Whether the absence or presentation of vital information is likely to deceive the Recipient depends on various factors such as the context, medium, and restrictions of the medium of advertising communication. In the case of restricted time or space, Operators must take measures to make that information available to the Recipient through other means;
- 3.1.3. Advertising must not mislead Recipients by overstating product capabilities or performance or making unsubstantiated claims about improving Recipients' chances of winning ;
- 3.1.4. Terms for Recipients to redeem any offer or bonus must be clearly stated;
- 3.1.5. Advertising that compares identifiable competitors must not deceive or mislead Recipients about either product;

- 3.1.6. Advertising must not include anything that promotes or endorses violence, anti-social behaviour or any form of criminality;
 - 3.1.7. Advertising must not create the impression that Commercial Gaming can be a strategic solution to the relief of personal hardships, financial issues or a substitute for employment, and should emphasize its entertainment value and the need for responsible play;
 - 3.1.8. Commercial Gaming cannot be portrayed as taking precedence over family, friends, education, or religious commitments;
 - 3.1.9. Advertising must be conducted without implying that gambling may potentially enhance personal qualities such as self-image, self-esteem, control, superiority, recognition, or admiration. Moreover, it should avoid associating Commercial Gaming with enhanced attractiveness, sexual success, or an increased likelihood of getting married. Additionally, the portrayal of Commercial Gaming should not be in the context of toughness or linked to resilience or recklessness;
 - 3.1.10. Advertising must not make reference or take advantage of cultural beliefs concerning gambling or luck; and
 - 3.1.11. Advertising must not portray solitary gaming as being superior to social gaming for entertainment purposes.
4. Advertising to Underage Persons
 - 4.1. All Advertising has to include an express reference to the prohibition of Underage Persons from participating and must not be directed at or of primary appeal to them. The susceptibilities, aspirations, credulity, inexperience or lack of knowledge of Underage Persons must not be exploited.
 - 4.2. Advertising should be appropriately targeted to avoid reaching audiences under the legal gambling age. Platforms should use age verification tools and algorithms to minimize exposure to underage users.
5. Promotional Marketing
 - 5.1. When using Promotional Marketing in Advertisements, Operators must ensure that:
 - 5.1.1. All the relevant terms and conditions are provided clearly and visibly directly alongside the Promotional Marketing. This means that Promotional Marketing must be presented and described in a fair and balanced way regarding advantages and disadvantages. In the list of terms and conditions, conditions and restrictions should be listed in a prioritised order according to their significance. The Operator is responsible for assessing the relevant terms and conditions. This assessment shall consider whether the term or condition will likely affect the Recipient's decision to accept the promotion.
 - 5.2. The following terms and conditions are listed as significant. These must be clearly communicated to consumers to ensure informed participation:

- 5.2.1. Eligibility Restrictions: Promotions may be designed exclusively for specific groups of consumers, such as new customers. These limitations must be explicitly stated.
- 5.2.2. Wagering (Playthrough) Requirements: If a promotion includes a requirement to wager a specified amount before withdrawing wins, this condition must be clearly outlined. An illustrative example should be provided to help consumers understand how the requirement operates in practice.
- 5.2.3. Minimum Stake Requirement: Certain promotions may require a minimum bet amount for wagers to contribute towards the playthrough requirement. Details of this minimum stake must be disclosed.
- 5.2.4. Deposit Conditions: If a deposit is necessary to qualify for or participate in a promotion, this requirement must be transparently stated;
- 5.2.5. Game Contribution Limits: It should be clearly indicated if any games do not count towards the fulfilment of the playthrough requirement, including a list of such games or categories.
- 5.2.6. Time Restrictions: The period within which all conditions of a promotion must be met, such as a 60-day limit for fulfilling a playthrough requirement, must be specified.
- 5.2.7. Winnings Cap: If there is a maximum limit on the amount that can be won using funds from a promotion, this maximum limit must be clearly stated.
- 5.2.8. Maximum Bet Limits: Any restrictions on the stake amount per wager within a game, including specific limits, such as a bet limit amount or a limit of 10% of a bonus, must be disclosed. Additionally, it should be clarified if exceeding these limits could result in the confiscation of winnings.
- 5.3. Terms and conditions must not include provisions that do not apply to the specific sales promotion being displayed.
- 5.4. All terms and conditions related to the sales promotion must be readily accessible to the Recipients with no more than a single click from the initial presentation of the sales promotion. To ensure compliance, every interactive element associated with the sales promotion's presentation (including, but not limited to, images, headlines, and call-to-action buttons) must link directly to the terms and conditions of such sales promotion.
- 5.5. Any changes to Promotional Marketing terms and conditions should only occur in exceptional circumstances and only apply to new users adhering to such Promotional Marketing, being the previous terms and conditions applied to users that adhered to the Promotional Marketing prior to the changes to the terms.

6. Opt-out

- 6.1. Direct Advertisement, or an Advertisement disseminated to a specific individual or individuals, must clearly and conspicuously describe a method by which an Individual may opt out of receiving future Advertisements. If the direct Advertisement is sent via electronic mail, the described opt-out method must include either electronic mail or a

linked online website. All other direct Advertisements must include at least one of the following methods to opt-out:

- 6.1.1. Telephone;
 - 6.1.2. Online website or Mobile Application;
 - 6.1.3. Electronic mail; or
 - 6.1.4. When no electronic service is available, by mail.
- 6.2. Operators must act upon a request for opt-out under this section within forty-eight (48) hours of receipt to ensure the Recipient that requested opt-out will no longer receive Advertisements.

7. Third-parties

- 7.1. Operators are responsible for the adherence of third parties with whom they contract to these Advertising Standards, to any laws, codes of conduct, terms of use, policies or norms issued by the GCGRA and to any applicable laws and regulations of the UAE.
- 7.2. Operators must ensure that no third party, or company within the third party's group or otherwise controlled by the third party, with whom they contract for Advertising purposes also engages in such activities related to online gaming sites that are not licensed with the GCGRA and that facilitate or accept bets from players located in the UAE.
- 7.3. Operators must submit annually to the GCGRA, according to the timeframe and guidelines to be defined by the GCGRA, a policy containing details of their management of third parties with whom they contract or intend to contract for the purpose of Advertising in such year. Such policy will be subject to the GCGRA approval.

Standards applicable to specific Advertising channels

8. Television, Radio and Streaming

- 8.1. Advertisings conducted in television, radio and streaming services shall not be broadcasted during, before or after programmes with content that, when linked to Commercial Gaming are likely to cause harm or offence or violate any of the provisions of these Advertising Standards or that are directed or likely to be directed to Underage Persons.
- 8.2. Advertising should not be broadcast during or adjacent to Underage Persons programming or at times when a significant number of Underage Persons are likely to be watching or listening, except for the following:
 - 8.2.1. Responsible gaming Advertisements may be broadcasted during major sporting events, even if these occur at times when Underage Persons are likely to be watching or listening, provided that such Advertisements:
 - 8.2.1.1. Clearly promote responsible behaviours and do not encourage active participation in gaming;

- 8.2.1.2. Are designed and broadcasted in a manner that minimizes appeal to children, including the avoidance of animations, child-friendly music, and imagery that is likely to attract the attention of children;
- 8.2.1.3. Include a clear message about the age restrictions for gaming and resources for gaming help services. Advertising conducted in television, radio and streaming services shall include mandatory information, such as responsible gaming messages, according to the instructions provided by the GCGRA, that may be amended from time to time.

9. Sponsorship

- 9.1. Operators may engage in Sponsorship given that the following standards are observed at a minimum:
 - 9.1.1. Sponsorship shall be restricted to text, logos, or imagery serving the exclusive purpose of identifying the operator;
 - 9.1.2. Product Placement is forbidden;
 - 9.1.3. The logos or imagery used in sponsorship shall unambiguously indicate the identity of the Operator;
 - 9.1.4. Sponsorship of Underage Persons shall be prohibited. However, an Operator may lawfully sponsor events predominantly attended by adults or teams composed of adults, which may encompass the participation of of 3 ne or more Underage Persons;
 - 9.1.5. Activities where most of the audience is reasonably expected to be composed of underage or vulnerable persons or have particular appeal to such persons shall not be sponsored;
 - 9.1.6. An operator must not cause any promotional material, including any logos or text, to appear in merchandising intended for Underage Persons;
 - 9.1.7. Sponsorship or Advertising in televised programmes that have or are expected to have particular appeal to underage or vulnerable persons shall be prohibited.
- 9.2. Advertising in stadiums and other sporting venues must follow the applicable laws and regulations and the instructions provided by the GCGRA, which may be amended from time to time.

10. Direct Marketing

- 10.1. Direct marketing shall only be allowed in cases where the subject of such Advertisement had the opportunity to opt-in or, in some express manner, consented to be subject to Direct Marketing, regardless of the means of communication. All means of Direct Marketing shall clearly identify the Operator, contain warnings about responsible gaming and the prohibition of participation of Underage Persons alongside a link to the terms and conditions of the respective promotion. Further requirements regarding Direct Marketing may be provided by the GCGRA, and amended from time to time;

10.2. Self-excluded Players or Involuntarily Excluded Players must be excluded from being targeted with Direct Marketing. For a Self-excluded Player to reactivate a previously deleted or by any means restricted account and be subject to Direct Marketing, the previous consent to Direct Marketing is voided and such player must have a new opportunity to opt-in or, in some express manner, consented to be subject to Direct Marketing, regardless of the means of communication.

11. Websites and other online spaces

11.1. Advertising shall not be conducted via websites and/or other online spaces whose content is incompatible with the rules applicable to all forms of Advertising, namely the ones foreseen in articles 3 and 4 of these Advertising Standards. Any websites/online spaces where Advertising is displayed shall not:

11.1.1. be aimed at Underage Persons;

11.1.2. contain any defamatory, hateful, discriminatory or indecent content;

11.1.3. use obscene or offensive language;

11.1.4. infringe any third party's Intellectual Property Rights; and/or

11.1.5. violate any UAE applicable law or these Advertising Standards.

11.2. The GCGRA, or other UAE regulatory or governmental body may publish a list of websites infringing third party Intellectual Property Rights and Operators must not conduct Advertising with any website on such a list and remove any new websites added by conducting checks on such a list at least every 3 months.

11.3. Websites and/or other online spaces that compare operators or their products should not deceive or mislead Recipients about either the advertised licensed operator or product or the competing operators or products. Operators have an affirmative duty to monitor Advertising referencing its operations and report deceptive or misleading content to the GCGRA.

11.4. The GCGRA may, at its sole discretion, determine that some of the restrictions stated in 11.1. do not apply to the websites owned by operators where their Commercial Gaming activity is conducted.

12. Social Media

12.1. To ensure Advertisements are only sent to individuals who have explicitly agreed to receive them, direct social media communications may be sent only to Recipients who have given their prior consent (opt-in).

12.1.1. Opting in must require a deliberate action by the individual, such as ticking a box or sending a confirmation message. Pre-ticked boxes or assumed consent based on unrelated actions (e.g., creating an account for a different service) are not acceptable.

12.1.2. Information on how to opt-out of receiving Advertisements must be clearly provided at the time of opt-in and with every subsequent Advertisement. Opting out should be as easy as opting in.

- 12.2. Advertising must not be conducted via social media or online content-sharing services whose content is incompatible with the rules applicable to all forms of Advertising.
- 12.3. Advertisements conducted via social media or online content-sharing services must activate, whenever possible, the mechanisms provided by these platforms aimed at preventing or limiting their access to Underage Persons.
- 12.4. Profiles, websites and any other content belonging to Operators present in social media or online content-sharing services shall comply with the instructions provided by the GCGRA, that may be amended from time to time.

13. Languages of Advertising

- 13.1. Operators should not use the Arabic language in any forms of Advertising until directed otherwise by the GCGRA.

14. Depiction of UAE national symbols

- 14.1. Operators should not use any visual, pictorial or audible direct or indirect representation of the Emirati or Islamic Culture such as:
 - Use of the UAE Flag;
 - Traditional dress;
 - Islamic or National events & celebrations;
 - UAE leaders, officials, & public figures;
 - National emblems.