

1. General

The primary duty of gambling operators and any third-party marketing partners which we engage is to act socially responsible and to ensure consumer fairness. We expect our marketing partners to take proactive and pre-emptive steps in identifying potential issues when creating and distributing sales promotions and advertisements.

These Guidelines specifically address legal and regulatory obligations and requirements that must be complied with, and which originate from several regulatory, legislative or industry standards, including without limitation (and as updated, amended or restated from time to time);

Sweden

- (a) The Swedish Gambling Act and subsidiary regulation
- (b) Notifications and clarifications of the Swedish Gambling Authority
- (c) Rulings of the Reklamombudsmannen and Konsumentverket

Malta Gaming Authority

- (a) Remote Gaming Regulations 2018 and subsidiary legalization
- (b) Commercial Communications Committee Guidelines (V1 March 2019)

All markets – Data Protection

- *e-Privacy Directive*
- *The General Data Protection Regulation*

For any commercial communications in accordance with the MGA (Malta Gaming Authority), the Affiliate commits to adhere to the detailed Guidelines issued by the Commercial Communications Committee. The current version is available here: <https://www.mga.org.mt/wp-content/uploads/Commercial-Communications-Committee-Guidelines.pdf>

Please note that these guidelines are not exhaustive, and the affiliate must always comply with applicable law and regulation even if the rule or restriction is not specifically stated or listed in these guidelines.

2. General Principles

The following areas warrant attention and consideration when marketing gambling products:

- (a) Direct marketing shall only be sent to customers for which the Affiliate has a valid consent and who are not excluded from gambling;
- (b) Sales promotions should always be clear and accurately advertised;
- (c) Adverts should not indirectly feature themes that link gambling to toughness, resilience, and recklessness;

(d) Adverts should not give the impression that gambling can be a primary source of income or an answer to the payment of debts;

(e) Always be aware as to the social responsibility, such as ensuring that adverts and promotions don't encourage gambling in ways that might harm or exploit children, young people, or vulnerable adults.

3. Inclusion of Socially Responsible Information

No marketing communications must be sent to players who do not include information on responsible gaming and what help is available to players who may be experiencing gambling problems.

All gambling advertisements should contain a warning about the fact that underage gambling is illegal. All responsible gambling pages on our websites must be free from other incentives to gamble. Thus, no advertising or additional marketing information, whether relating to specific offers or gambling generally, appear on any primary web page/ screen or microsite that provides advice or information on responsible gaming.

4. Guidelines for the Marketing of Free Bets and Bonus Offers

Misleading sales promotions have consistently been the most prevalent issue in gambling ads since they have been found in breach of the rules, and may have a potential to mislead, and appeal to younger adults. This, therefore, requires that the terms and conditions for bonus offers should be easily accessible on the site and must also be clearly defined to the player. There are concerns about these types of promotions both in terms of their potential to mislead and in terms of their general social influence. At Hero, we aim to make our incentives as clear as possible in terms of what the offer contains and the desired actions the customer must take to obtain it. An example being differentiating the term used for promotional spins between free spins (in which the customer does not have to deposit, to unlock the valuable) and bonus spins (where, e.g., a deposit is required to open the valuable). All operators and respective affiliates must assure that the availability of incentive or reward or other arrangements by which the customer potentially receive money, goods, services or any additional advantage (including the discharge in whole or in part of any liability of his) ('the benefit') the scheme must be designed to operate, and be conducted, in such a way that:

(a) Incentive or reward schemes should only be offered whereby the benefit available is proportionate to the type and level of customers' gambling;

(b) The circumstances in which, and conditions subject to which, the benefit is available are set out and readily accessible to the customers to whom it is offered;

(c) Neither the receipt nor the value or amount of the benefit is:

i. dependent on the customer gambling for a predetermined length of time or with a predetermined frequency; or b. Altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.

(d) If the value of the benefit increases with the amount, the customer spends it does so at a rate no higher than that at which the amount spent increases.



Where space is available, marketing communications must state significant limitations and qualifications. Qualifications may clarify but must not contradict the claims that they qualify.

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

Participants should be able to retain those conditions or easily access them throughout the promotion.

Terms and conditions relating to consumers' understanding of an offer and of the commitments that they must make to take advantage of such a proposal should generally be stated in the advertisement itself. Where the ad is limited by time or space (for example a banner advertisement), significant conditions likely to affect a consumer's decision to participate in promotions should be displayed no further than one click away from the ad itself. If the significant conditions are not displayed with enough prominence, the advertisement will be misleading/unfair to the consumer.

Examples where a free bet or bonus offer potentially will be non-compliant include:

- (a) The promotion does not provide supporting information on the terms and conditions of the offer, or gives it with insufficient prominence for example only visible once scrolled down;
- (b) When clicked, advertising banners take a customer directly to the join or login section of the website, without providing terms and conditions of the offer;
- (c) Significant information may only be available 'below the fold' on a web page, or email and a customer may only be aware that terms and conditions apply if they actively scroll to the end of a webpage or similar.

5. Direct Marketing Guidelines

Self-Excluded Players

Players who have self-excluded shall not receive direct marketing. Upon self-exclusion, the players will be flagged as closed / inactive, and the direct marketing system is configured to disregard all inactive accounts when sending marketing materials automatically. If any error is received in the use of this system, this must be immediately reported to compliance who can conduct an incident assessment and proactively report the incident to the relevant regulators.

Consent

Direct marketing must not be sent to players for whom we do not have consent . Consent is obtained from players a registration; Players can withdraw consent by clicking on "unsubscribe" links in emails in their account at any time. Hero must not contact customers with direct electronic marketing without their informed and specific consent. Hero ensures that customers are removed from direct marketing databases using an automated system which does not market to customers who have not given or who have withdrawn consent. If any error is received in the use of this system, this must be immediately reported to compliance who can conduct an incident assessment and proactively report the incident to the relevant regulators.

6. Social media

Our logotypes and advertisements may not appear on sites that are illegal or in violation of good practice, such as unlawful movie streaming sites, or on websites that otherwise contribute to an image of the gaming industry that we do not want to be associated with, such as pornography. Alongside the general guidelines, the following specific guidelines apply

- (a) social responsibility requirements and age requirements on consumer-facing marketing content on YouTube channels must be followed.
- (b) Twitter age-screening function must be used;
- (c) Age restriction shall apply to all direct marketing video uploads to YouTube. This can be done simply by 'checking' the age restriction option when uploading content via YouTube.

7. Sweden-specific Guidelines

For any marketing in Sweden, the Affiliate commits to adhere to the detailed Guidelines issued by the trade associations. The current version is available here: <http://www.bos.nu/wp-content/uploads/2019/03/BOS-and-SPER-Marketing-Guidelines-2.1.pdf>.

Additionally, the following applies:

Support organisations

All marketing must include a link or phone number to www.stodlinjen.se where customers can take a test identifying gambling problems.

No direct marketing

Marketing via email and SMS is NOT allowed without prior approval. For any approved email and SMS marketing, the following applies. Specifically, marketing:

- (a) may not be sent via email or text to an individual who has not consented to receive the communication.
- (b) must include an opt-out link and any opt-outs must be respected.
- (c) may not be sent to anyone who has registered with spelpaus.nu.

Specifically, prohibited statements:

In addition, and as further guidance connected to the rules above, the following statements are expressly forbidden. Please note that this is not an exhaustive list and any third-party marketing partners are expected to keep abreast of regulatory developments concerning what statements can be made.

- (a) Any references to “no account,” “no registration,” or similar.
- (b) Any references to speed or specific time references concerning deposits or withdrawals.
- (c) Any urging statements such as “play now” or “play immediately.”



Bonus

Bonuses must only be available to customers upon acquisition of the customer (“Welcome Bonuses” only), and Welcome Bonuses must be available to all persons on the same terms.