



Responsible Marketing and Advertising Policy

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Approved

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PREFACE

PURPOSE

The purpose of this Policy is to set out Playtech's standards for responsible marketing and advertising.

APPLICATION OF THIS POLICY

This Policy applies to Playtech Plc and all its subsidiaries ('Playtech Group'). 'Playtech' is used in this document to mean any entity in the Playtech Group.

This Policy applies to all commercial communications under Playtech Plc companies, including those operated by subsidiaries of Playtech Plc, either directly or indirectly, through affiliates, agents or partners.

This Policy applies to all persons working for, or on behalf of Playtech, in any capacity, including employees at all levels, such as directors, officers, agency workers, seconded workers, volunteers and interns ('Personnel'). Where appropriate, this Policy also applies to contractors, external consultants, third-party representatives, business partners, sponsors, or any other person associated with Playtech, wherever located.

From time-to-time, Playtech will engage third party specialists to advise on Marketing and Advertising. This does not, however, absolve Personnel from their obligations and responsibilities in relation to Marketing and Advertising.

Where local marketing and advertising laws and regulations apply in any country in which Playtech operates, those laws and regulations must be followed in addition to the requirements of this Policy. If any such local laws are not as strict as the terms of this Policy, then the terms of this Policy must be applied to the extent permitted by local law.

Any breach of this Policy may result in disciplinary action. This Policy does not form part of any employee's contract of employment and Playtech may amend it at any time.

OVERSIGHT OF THIS POLICY

Playtech's Audit and Risk Committee has overall responsibility for ensuring that this Policy complies with Playtech's legal and ethical obligations, and that all those under its control comply with the Policy.

The Audit and Risk Committee is also responsible for approving this Policy, monitoring its effectiveness, raising risks to the Board of Directors and ensuring that appropriate actions are taken to mitigate risks.

The Vice President of Marketing has responsibility for ensuring that B2B marketing, advertising and corporate sponsorship practices adhere to this policy. At the operational level, each relevant division is responsible for transposing and aligning this policy into operational procedures and overseeing the implementation, monitoring and effectiveness of those procedures.

This Responsible Marketing and Advertising Policy shall be reviewed on at least an annual basis or because of a business change.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to compliance at compliance@playtech.com.

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1 POLICY STATEMENT

Playtech has made safer gambling a core part of its long-term sustainability strategy, recognising that innovation in safer gambling is critical for keeping pace with regulatory, consumer and societal expectations to deliver a positive, trusted, safer online customer experience.

As well as developing technology solutions to address safer gambling challenges and raise standards across the industry, Playtech is committed to upholding best practices standards for responsible marketing and advertising and adhering to all local laws and regulations.

2 GUIDING PRINCIPLES

Playtech must ensure that any marketing of regulated products is undertaken under the supervision of relevant personal licence holders as may be required by regulations in specific jurisdictions.

Playtech will abide by the marketing requirements in force in every jurisdiction in which it markets its products. The specific requirements for some, but not all, jurisdictions are listed in [Appendix A](#). As part of our commitment to responsible marketing and advertising, Playtech are committed to ensuring that all marketing and advertising communications will:

- Be legal, and comply with all legislative and regulatory requirements, as well as voluntary codes and guidance
- Promote responsibility messages as required by local regulations, such as 18+ and begambleaware.org for the UK;
- Be truthful and not misleading
- Be transparent, fair and clear
- Be mindful of sensitivities relating to local, cultural values such as gender, race and religion
- Not exploit children and other vulnerable people
- Not appeal to underage persons
- Not portray, condone or encourage gambling behaviour that is socially irresponsible
- Not suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security
- Not involve anyone who appears to be underage
- Not involve the use of characters such as superheroes and celebrities that are popular with, or are likely to appeal to children
- Not link gambling to seduction, sexual success, or enhanced attractiveness
- Not use aggressive advertising methods

Some, but not all, of the specific requirements per marketing channel, can be found below:

- **Social Media**
 - Paid for marketing must be clearly labelled when produced in collaboration with influencers, bloggers, such as #Ad
 - Brand and/or corporate profiles on social media should clearly state the legal age limit for gambling, as well as responsible gambling messaging

For more information on social media policy and guidelines, please refer to the Group Social Media guidelines.

- **Television**

Safer gambling messaging to be displayed during the advert, for example, begambleaware.org must remain on the screen for at least 10% of the advert's length in the UK

- **Radio**

Reference to safer gambling messaging, for example, 'please play/gamble responsibly' (or equivalent safer gambling message) or www.begambleaware.org in the UK

- **Print Advertisements**

- Clearly carry the age limit for gambling, for example, either a '18+' symbol, or a 'no under 18s' type of message in the UK or 21+ in the USA
- Clearly show a safer gambling message, such as begambleaware.org in the UK, so that it is in proportion to the advertising script

- **Digital Media**

Must show a link to safer gambling organisation, for example begambleaware.org in the UK

- **Direct Communications**

- Must receive specific consumer consent prior to delivering marketing communications
- Check boxes for receipt of marketing must not be pre-checked. We must provide a clear and transparent mechanism for consumers to opt-out of receiving direct commercial communication
- Ensure all marketing messages include the name and address of the sender
- Must adhere to data management and privacy processes

- **Affiliates**

- Playtech will be held responsible for the actions of any affiliate undertaking marketing on its behalf. As such, Playtech must have effective systems and controls in place to manage affiliates to ensure they are complying with legislative and regulatory requirements. Playtech will ensure that:
 - Affiliates receive a copy of this Policy
 - Contracts with marketing affiliates must clearly set out the requirements for compliance with this policy and the consequences of failing to do so
 - Affiliate activity is monitored; and
 - It has appropriate contractual clauses within its agreements with affiliates that allow it to enforce this policy and specifically allow termination of said agreements where required.

- **Marketing Approval Controls**

All marketing must be subject to appropriate approval processes that have been approved by the Compliance team.

3 TERMS AND CONDITIONS

Full terms and conditions for the promotion must be provided. Where the full terms and conditions cannot fit within the promotion, due to space limitations, these terms and conditions must be easily available, for example, one click away from promotional banners in the UK.

The significant terms and conditions must be directly under a marketing/bonus/promotion offer, and include:

- WHO is eligible to receive the promotion/bonus
- WHAT needs to be done to qualify for the promotion, e.g., deposit, wagering requirements
- WHERE the promotion/bonus can be redeemed e.g., in selected rooms/games
- WHEN the promotion starts and ends or when the draw takes place

4 B2C OPERATIONS

Where Playtech are operating B2C operations, the relevant marketing lead in those divisions, alongside the relevant Head of Compliance, are responsible for ensuring that robust procedures and management controls are in place to ensure that operations are complying with all relevant marketing and advertising regulations and procedures. For example, there is a separate B2C Responsible Marketing and Advertising Policy for UK operations, which can be requested from the B2C Compliance Manager.

5 TRAINING

Employees in marketing and advertising roles will receive specific training to ensure that they understand how to comply with applicable marketing and advertising requirements. Additionally, the Vice President of Marketing is responsible for ensuring that relevant staff are aware, trained and adhering to operational procedures.

APPENDIX A - JURISDICTIONAL REQUIREMENTS

Belgium

Code of Economic Law of February 28, 2013

Gambling Law of May 7, 1999

Royal Decree of October 25, 2018

Belgian Association of Gaming Operators' (BAGO) Convention on Responsible and Ethical Advertising

Denmark

Gambling Act

Marketing Act

Guide on sales promotions (2023)

Guide on duty of disclosure when marketing and advertising gambling (2022)

Newsletter No. 40 on the use of the term "free" in bonus advertising

Voluntary code of conduct (published by the Danish Online Gambling Association (DOGA) on March 15, 2019)

Estonia

Advertising Act 2023

Gambling Act 2020

Germany

Interstate Treaty on Gambling 2021

Greece

Law 4002/2011 (Article 35) – Commercial communication, Regulation on Commercial Communications (Ministerial Decision No. 163/4C/2015, as amended by Ministerial Decision No. 184/3/2015) and Directive 1/2017.

Latvia

Gambling Law

Advertising Law

Lithuania

Gaming Law

Law on Advertising

Gaming Control Authority's guidance on gambling advertising and description of the procedure for the presentation of warning notices in gambling advertising Netherlands

Regulation recruitment, advertising and addiction prevention as of 30 June 2022

Romania

Articles 1.2 and 26 of the Gambling Act

Articles 6, 8, 23 and 132 of the Gambling Regulation

Article 89 of the Audiovisual Code

Spain

Royal Decree 958/2020

Agreement on advertising, sponsorship and promotion of state-level gambling activities

Code of Conduct on Commercial Communications of Gambling Activities.

Sweden

Gambling Act (2018:1138)

Radio and Television Act (2010:696)

Marketing Guidelines of the Swedish Gaming Industry

Switzerland

Federal law 935.51 of September 29, 2017 on Gambling (Gambling Act)

Guidelines on advertising and sponsorship 2019

UK

Gambling Act 2005 - (Part 16)

UKGC Licence Conditions and Codes of Practice

Gambling Industry Code for Socially Responsible Advertising

UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code)

UK Code of Broadcast Advertising (BCAP Code)

Gambling and lotteries advertising: protecting under-18s (Advertising Guidance for CAP and BCAP)

Competition and Markets Authority (CMA) Advice

USA

iDevelopment and Economic Association (iDEA) - Responsible Advertising Committee's Sports Wagering Responsible Advertising Code

American Gaming Association (AGA) Responsible Marketing Code for Sports Wagering

APPENDIX B - MARKETING APPROVAL CONTROLS

Playtech publish a wide variety of marketing material to showcase Playtech's products. This includes different types of assets, including game tiles with game names, game tiles with images and game logos, all of which can be used in different environments and served through various channels, such as LinkedIn and social media.

There are various regulations, requirements and guidance that Playtech must adhere to when formulating and publishing marketing material. Unless marketing material is specifically targeted at an identified country, Playtech will apply the **UK marketing requirements**. This includes, but is not limited to:

- Gambling Act 2005 - (Part 16)
- UKGC Licence Conditions and Codes of Practice
- Gambling Industry Code for Socially Responsible Advertising
- UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code)
- UK Code of Broadcast Advertising (BCAP Code)
- Gambling and lotteries advertising: protecting under-18s (Advertising Guidance for CAP and BCAP)
- Competition and Markets Authority (CMA) Advice
- Advertising Standards Agency (ASA) guidance and rulings

To ensure that Playtech's marketing material is compliant with various regulations, requirements and guidance, Playtech has implemented the following approval process:

1. Business area creates suggested copy and imagery of the marketing material
2. The suggested copy and imagery of the marketing material is sent to relevant stakeholders – where the marketing material is product specific, the marketing material will always be signed off by the product leads first
3. Once the copy and imagery of the marketing material has been signed off by relevant stakeholders, including the product leads where the marketing material is product specific, compliance will do a final review and sign off
4. The marketing material will then be sent to the PR and Comms team to publish the marketing material, which will be accompanied by an email chain showing the various approvals

When undertaking a review of marketing material, some of the checks that compliance undertake include, but not limited to:

- Ensuring that the imagery is not appealing to children
- Ensuring that videos including game content, are age-gated
- Ensuring that all marketing includes the 18+ symbol (or higher depending on the targeted market) as well as safer gambling messaging
- Ensuring that only low stakes, low balances and small wins are shown, where relevant
- Ensuring that the game displayed is compliant in the target market, eg that autoplay is not visible on slot games used in British facing advertising

All marketing approvals are recorded and noted in the marketing planner on Monday.com.

If in doubt, please speak to the VP of Marketing, Head of Product Marketing or Compliance team.