

Advertising and Marketing Policy

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Sign off/ Approval.

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1. Purpose

The purpose of this policy is to ensure that all marketing and advertising efforts are conducted ethically, responsibly, and in strict adherence to the relevant laws, regulations, and industry standards governing the gambling and advertising sectors. We aim to foster a culture of transparency, fair play, and player protection while promoting our products and services effectively and responsibly.

2. Applicability

This policy applies to all employees, contractors, partners, and affiliates engaged in advertising and marketing on behalf of EveryMatrix. It encompasses all forms of marketing, including but not limited to print, digital, social media, affiliate, and promotional materials.

3. Guiding Principles

Our B2B marketing strictly adheres to our Safer Gambling Policy. We promote EveryMatrix's products and services with a focus on safer gambling principles. This approach underscores transparency, integrity, and player protection. Our aim is to convey excellence while fostering responsible gambling among clients and partners.

In implementing our advertising and marketing activities, EveryMatrix adheres to the following guiding principles:

- A. **Safer Gambling:** We are committed to promoting Safer Gambling and ensuring the well-being of players, as well as maintaining the integrity of our B2B relationships. All marketing materials must reflect this commitment and include Safer Gambling messaging, helpline information, and links to self-exclusion programs. We prioritize showcasing our products and services in a manner that supports a safer gambling approach, whether to players or our B2B clients:
 - I) Emphasises the fun and entertaining aspects of playing gaming products and/or the public benefit derived from such play, does not denigrate a person who does not play or unduly praise a person who does, and does not play into personal financial difficulties by implying a win will change life for the better,
 - II) Does not portray product abuse, excessive play, preoccupation with gambling or any illegal activity, and it does not suggest in any way that excessive, irresponsible, or illegal gaming is an amusing or acceptable behavior, nor does it encourage anonymous play or secrecy around gambling,
 - III) Does not glamorize inappropriate use of the product and is not knowingly placed adjacent to other media glamorizing or dramatizing inappropriate use of the product. Inappropriate can be considered as positioning in a way that is culturally or socially in poor taste or encourages product use with other potentially addictive products,
 - IV) Does not imply or state that gambling activity will elevate or guarantee an individual's social, financial, or personal success, nor will it play into an

individual's self-esteem or imply gambling will enhance their likeability or attractiveness,

- V) Does not promote gaming as an alternative to employment or investment, as a guaranteed or likely way to financial security, or as a means of relieving personal financial difficulties,
 - VI) Does not contain false promises or present winning as the probable outcome or implies that a chance of winning increases the longer one plays,
 - VII) Does not suggest that skill can influence the outcome of non-skill-based games,
 - VIII) Does not give rise to the hope in players' minds that all the participating players will win high prizes,
 - IX) Does not create a false sense of urgency or pressure that would cause a reasonable person to feel they must act quickly to participate or win,
 - X) Does not directly advertise or target vulnerable populations or disadvantaged groups or encourage problem gambling, or play on fear or superstitions through the use of cultural symbols or references,
 - XI) Does not seek to attract persons less than a jurisdiction's legal age to play (through the selection of media, style of presentation, content or context in which these appears),
- B. **Integrity and Truthfulness:** We uphold the highest standards of honesty and accuracy in all our marketing communications. Every marketing message must be truthful, transparent, and not misleading to our customers.
- C. **Player Protection:** We prioritize the protection of minors and vulnerable individuals. Our marketing efforts must not appeal to or target minors, and strict age verification processes must be in place.
- D. **Ethical Advertising:** We do not engage in advertisements that exploit vulnerable individuals, promote excessive gambling, or misrepresent our products and services. **Employees will adhere to this policy at business events, such as conferences, seminars and in sales and marketing brochures.**
- E. **Compliance:** EveryMatrix is fully committed to complying with all applicable laws, regulations, and industry standards related to gambling and advertising in the jurisdictions we operate. Our marketing efforts must reflect this commitment.
- F. **Data Privacy and Consent:** We respect the privacy of our customers and strictly adhere to data protection laws. All marketing activities involving the collection and usage of personal data must have explicit consent from the individuals concerned.
- G. **Clear and Transparent Terms:** All marketing materials that include promotional offers, bonuses, or incentives must have clear and easily accessible terms and conditions.
- H. **Review and Approval Process:** All marketing materials must undergo a rigorous review and approval process to ensure compliance with this policy and applicable laws. The marketing team is responsible for obtaining the necessary approvals from the relevant stakeholders.



- I. **Continuous Improvement:** We are committed to continually improving our marketing practices by staying informed about industry developments, best practices, and customer feedback.

EveryMatrix reserves the right to take appropriate actions, including disciplinary measures, against any individual or entity found in violation of this policy. Additionally, this policy may be subject to periodic reviews and updates to reflect changes in laws, regulations, and best practices.

4. Information to display in commercial messages.

Educational responsible messaging such as 'Play responsibly' shall be prominently included within all commercial communications related to gaming.

Web portal of www.Begambleaware.org should be carried on all commercial communications where there is space.

All communicators except for sponsorship must prominently display a sign indicating 18+ being the minimum age to participate in the game being promoted.

5. Marketing Communication sign off Procedure

To ensure that all marketing communications meet the high standards set to protect players, all Marketing communication must be compliant with the Safer Gambling guiding principles outlined in section 3. Guiding Principles.

A quarterly review of compliance with the aforementioned guidelines will be conducted within the Safer Gambling Committee and a yearly assessment will be included in the Annual SG Report.