

**CHONGIE ENTERTAINMENT LIMITED  
ADVERTISING AND MEDIA POLICY**

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## 1. INTRODUCTION

Chongie Entertainment Limited is committed to complying with the requirements of all advertising regulations applicable within any jurisdiction it operates in and recognises the importance of honest and socially responsible marketing. It is imperative that Chongie Entertainment Limited acts responsibly and honestly when creating and executing marketing campaigns.

This Policy outlines the principles upon which Chongie Entertainment Limited will manage marketing campaigns in order to safeguard its business and to ensure the protection of young or vulnerable people.

## 2. UK ADVERTISING CODES

The Codes set out five key advertising principles which must be adhered to by Chongie Entertainment Limited in relation to the management of all advertising.

The general principles of the Codes are that advertising should be:

1. legal, decent, honest and truthful
4. prepared with a sense of responsibility to consumers and to society
5. respectful to the principles of fair competition generally accepted in business
4. not intended to bring advertising into disrepute

The Codes require all gambling advertising to be socially responsible and Chongie Entertainment Limited will ensure it respects the need to protect children, young persons and other Vulnerable Persons from being harmed or exploited by advertising that features or promotes gambling. Although 'vulnerable' person is not defined in the Gambling Act, the ASA will look at factors such as mental, social or emotional immaturity, impaired judgement, for example, because of alcohol or drug addiction, or those who are at risk of gambling more than they can afford to or want to. Nothing in Adverts should condone or encourage criminal or anti-social behaviour.

This means Chongie Entertainment Limited must:

- Be socially responsible, with particular regard to the need to protect Children, Young Persons and other Vulnerable Persons.

Chongie Entertainment Limited must not:

- Portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm;
- Condone or encourage criminal or anti-social behaviour.

A breach of the more specific principles of the Codes will often involve a breach of the social responsibility rules. Adverts that have been investigated under the social responsibility rules have included: portraying gambling as a possible solution to financial concerns and debt; linking gambling and alcohol consumption; and showing problem-gambling behaviours, such as solitary gambling or gambling taking priority in life.

Chongie Entertainment Limited's Policy sets out the rules and guidance for advertising and marketing. It is important that all employees, contractors, agents, consultants, partners or other parties working on behalf of Chongie Entertainment Limited are aware of and understand Chongie Entertainment Limited's Policy. Advertising or media campaigns must not be initiated without prior approval from the Board.

### **3 CHILDREN AND YOUNG PERSONS**

The Codes require marketing communications for gambling products to be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

This means Chongie Entertainment Limited must:

- Be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

Chongie Entertainment Limited must not:

- Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of Children, Young Persons or other Vulnerable Persons;
- Suggest peer pressure to gamble or disparage abstention;
- Suggest gambling is a rite of passage;
- Create marketing or advertising likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture;
- Create marketing or advertising directed at those aged below 18 years through the selection of media or context in which they appear;
- Include a child or a young person in marketing or advertising. No-one who is or seems to be under-25 years old may be featured gambling. No-one may behave in an adolescent, juvenile or loutish way.

No advertising should be based around individuals who are or seem to be under 25 years old (18-24 years old).

An advertisement featuring a character that particularly appeals to children is likely to fall foul of the rules. The use of cartoons or licensed characters, such as super heroes and celebrities popular with children, must be used with a due sense of responsibility. In other words, care should be taken when using cartoon-like images; they might be acceptable if they are adult in nature but run the risk of appealing to under-18s if cartoon images are too childish in their execution; and that might be a problem when advertising gambling products. In all cases, steps should be taken to prevent under-18s from viewing ads (for example age-gating online ads) and the likely age of the audience viewing the ad should always be considered.

#### 4 IRRESPONSIBLE APPEAL

Chongie Entertainment Limited recognises that irresponsible advertising and marketing related to gambling may appeal to Children, Young Persons or Vulnerable People and create a certain level of attractiveness to gambling. Chongie Entertainment Limited must ensure that all advertising and marketing is created responsibly and as such the below rules and codes must be applied when considering any marketing or advertising campaigns.

##### *Seduction, sexual success and enhanced attractiveness*

There must not be any direct or implied link between gambling, seduction, sexual success or enhanced attractiveness through any marketing or advertising.

The CAP & BCAP Codes state:

Marketing communications must not:

- Link gambling to seduction, sexual success or enhanced attractiveness.

It is acceptable to feature attractive people in advertising, as long as the ad as a whole does not link gambling with seduction, sexual success or enhanced attractiveness. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and enhanced attractiveness. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in enhanced attractiveness and an improvement in self-image, thereby breaching the rules.

##### *Toughness, resilience and recklessness*

The CAP & BCAP Codes state:

Marketing communications must not:

- Portray gambling in a context of toughness or link it to resilience or recklessness.

No advert or marketing campaign should be created without considering if the context as a whole might create a link between gambling and resilience or toughness, or portraying gambling in a context of toughness.

##### *Enhancing personal qualities*

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration.

Again, it is acceptable to feature attractive or admired people in advertising, as long as the ad as a whole does not link gambling with these qualities. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and improved self-image or self-esteem. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in an improvement in self-image, thereby breaching the rules.

*Cultural beliefs or traditions about gambling or luck*

The CAP & BCAP Codes state:

Marketing communications must not:

- Exploit cultural beliefs or traditions about gambling or luck.

Advertisements should avoid the use of cultural symbols and systems such as horoscopes if those symbols relate to an existing, strongly and communally held belief. These rules are not intended to prevent references to symbols or obsolete superstitions that are unlikely to be taken seriously, such as a clover leaf.

## **5 PROBLEM GAMBLING BEHAVIOUR**

*Taking priority and solving problems*

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression;
- Suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security;
- Portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments;
- Condone or feature gambling in a working environment. An exception exists for licensed gambling premises.

No marketing activity suggesting that gambling is a solution to financial concerns should be implemented by Chongie Entertainment Limited. Chongie Entertainment Limited views this as socially irresponsible and a breach of this Policy.

Even where risks are clearly set out, care and consideration should always be given to ensure gambling is not portrayed as a viable alternative to employment, or solution to financial concerns in any given context.

References to salary or debts in gambling should also be given specific consideration when planning any marketing or advertising campaign, to ensure there is no breach of the Codes or rules outlined in this Policy.

It is generally acceptable to show gambling as being important and interesting to characters, as long as it is not to the exclusion of other activities or interactions with people.

*Solitary gambling*

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that solitary gambling is preferable to social gambling.

Any advertisement that features an adult losing track of time, retreating into private fantasy or engaging in secretive gambling is likely to breach the general principle of the Codes that advertisements should not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.

Solitary gambling should not be shown favourably contrasting with social gambling.

## **6 MISLEADINGNESS**

All marketing communications and advertisements must state significant limitations and qualifications. Qualifications may clarify but must not contradict the claims that they qualify and should be presented clearly.

The terms “free”, “gratis”, “without charge” or similar should not be used unless the customer will not pay anything except the unavoidable cost of responding, collecting or paying for delivery of an item.

All marketing communications and advertising must make clear the extent of the commitment the consumer must make to take advantage of a “free” offer.

Chongie Entertainment Limited should ensure:

- Marketing communications or advertisements must not materially mislead or be likely to do so; and
- Marketing communications or advertisements must not mislead the consumer by omitting material information. They must not mislead by hiding material information or presenting it in an unclear, unintelligible, ambiguous or untimely manner.

Material information is information that the consumer needs in context to make informed decisions in relation to a product and to help them decide whether or how to buy a product or service. Whether the omission or presentation of material information is likely to mislead the consumer depends on the context, the medium and, if the medium of the marketing communication or advertisement is constrained by time or space, Chongie Entertainment Limited must take all measures possible to make that information available to the consumer by other means.

Marketing communications or advertisements 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 significant conditions of the promotion are prominently stated. Participants should be able to retain those conditions or easily access them throughout the promotion.

When using media such as banners for adverts, any significant terms and conditions should be no further than one click away from the banner or advert.

Examples of significant terms and conditions are:

- Requiring consumers to deposit the same amount of their own money as a free bet in order to take advantage of the offer;

- Requiring new customers to bet their initial deposit;
- Requiring customers to match a free bet amounts on a certain number of occasions before they are able to withdraw any cash winnings from their account;
- Imposing time limits in which bets must be made before winnings are forfeited; and
- Preventing consumers from being able to withdraw any of their own funds deposited into their account until they have placed bets totalling a certain number of times the value of the free bet.

The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

The term “risk-free bet” should be avoided unless the offer or free bet is completely free, requires no deposit, has no wagering requirements and is paid as cash that can be withdrawn by customers.

All free bet, bonus or similar offers should not be created or initiated without prior approval from the Board.

Any and all marketing and promotions must be approved by a manager relevant to the site and must be compliant with this policy.

## **7 SELF-EXCLUSIONS & SUBSCRIPTIONS**

Chongie Entertainment Limited is committed to complying with the requirements of the Act and LCCP, and recognises the importance of respecting our customer’s rights and freedoms. Chongie Entertainment Limited therefore ensures adherence to the following:

Chongie Entertainment Limited must take steps to remove the name and details of a self-excluded individual or any customer that unsubscribes from marketing communications from any marketing databases used by Chongie Entertainment Limited or group (or otherwise flag that person as an individual to whom marketing material must not be sent), as soon as practicable after receiving relevant notification.

## **8 MONITORING THE POLICY**

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of this Advertising and Media policy tailoring it to and any training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any advertising or media cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.