

Rank Group Ethical Marketing Policy (UK)

INTRODUCTION AND PURPOSE

As a gambling operator, we take social responsibility seriously, and this is reflected in our strategic purpose to deliver exciting and entertaining experiences in safe, sustainable and rewarding environments.

We are proud of our brands; they are recognised by millions of consumers and we want to encourage consumers to enjoy them responsibly. We present our brands as offering social enjoyment in a safe environment for responsible adults.

We strive to ensure that our marketing communications are always lawful, transparent, fair and truthful. They are prepared with social responsibility and respect for the principles of fairness and transparency at the forefront of our minds.

Compliance with all legal, regulatory and industry Codes of Practice requirements is paramount, and we endeavour to go above and beyond the minimum requirements where possible.

This Policy presents a set of principles that governs all our communication to support our strategic objective to excite and entertain our customers safely and sustainably.

SCOPE

This policy applies to the management, employees and contract workers of all entities in the Rank Group who are involved in marketing communications across all relevant channels, including digital.

The policy applies, without exception, to all points of contact with consumers in all media, including:

- Broadcast – TV, Radio and Press
- Print – Media publishers and marketing agencies
- Outdoor advertising
- Digital – such as websites/social media (paid and organic)/in app/podcasts
- CRM – email/SMS and account inbox messaging
- In venue point of sale material and merchandising
- Affiliates, ambassadors and brand representatives
- Events
- Sponsorship


The Rank Group Ethical Marketing Policy should be included in the briefing for agencies or other third parties developing marketing materials on behalf of the Rank Group.

All marketing and communications must, in addition to this Policy, at all times comply with the relevant local laws and regulations. Such compliance will usually be specifically required under the contractual terms agreed with third party suppliers. We promise that our selection of and continued relationship with advertising, content creation, media buying and other agency partners, will always take into full consideration their commitment to ethical marketing.



THE RANK GROUP COMMITS TO COMPLY WITH THE FOLLOWING PRINCIPLES IN ALL MARKETING COMMUNICATIONS

1. **Comply with regulation, codes and best practice.** These principles provide a clear baseline, however our marketing must comply with both the letter and spirit of all applicable laws and codes in the relevant jurisdiction. If local requirements are more stringent than these principles, then our marketing must abide by those additional local requirements.
2. **Our marketing will never target people under the legal age for gambling.** We will be mindful of potential harm, avoid exploiting vulnerabilities whilst complying with legal regulations to protect the same. We will not use personalities (live or animated, including celebrities and influencers) which are likely to have strong appeal to children. We only use influencers who are over 25 and we will conduct a risk assessment of an influencer's social media content and the age demographics of their followers before we agree to work with them. Our imagery does not feature anyone who looks under 25, and the content we share does not feature anyone who looks under the age of 25.
3. **All advertising and communications will be truthful and transparent,** avoiding misleading or deceptive tactics that could misinform consumers. All terms and conditions will be clear, transparent and readily accessible to our customers. We list here some examples of how we achieve this principle:
 - All new terms and conditions will be created and reviewed by our marketing team and then also reviewed by our central compliance team as a secondary check.
 - Key or significant terms will be included in any content where possible and appropriate.
 - We will adhere to a 'one-click' approach to terms and conditions whether that be a link to the relevant page on our website or a scan of a QR code in venue.
 - General terms and conditions in our venues are always available upon request from a team member.
4. Marketing communications and promotions will not create an **unjustifiable sense of urgency** and/or **encourage excess gambling**.
5. Our marketing will not portray or imply that gambling is **necessary to obtain social or other success**, nor to overcome inhibitions or to be socially accepted. Our aim is to balance creativity and sensationalism ensuring our campaigns do not exploit emotions or manipulate audiences for the sake of grabbing attention.
6. To consider the **environmental impact** of our campaigns. All aspects of production and distribution should minimise waste and embrace eco-friendly practices.
7. We will avoid perpetuating stereotypes, endorsing discrimination, or encouraging harmful behaviours. We will be mindful of **inclusivity and diversity** and represent a broad range of backgrounds and perspectives in our campaigns.
8. Our marketing communications and digital platforms will wherever possible include clearly visible and succinct **"responsible gambling"** messaging to promote information and tools to help consumers stay informed and make responsible choices about their gambling.

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9. All marketing activity **will respect the data privacy rights** of consumers and will comply with local data protection legislation, including but not limited to the following:
- a. Respecting a customer's marketing preferences.
 - b. Data must not be used for cross brand marketing without explicit consent from the recipient.
 - c. Direct digital marketing (email and SMS) must also comply with the Privacy and Electronic Communication Regulations (PECR) or other local law.
 - d. Any data collection must include a privacy notice advising on how and why the data is being collected.
10. Marketing of any Rank Group brands will not feature on third party websites facilitating and/or encouraging **copyright infringing, age-inappropriate content, or content relating to illegal/criminal activities**.
11. We commit to **ethical search engine optimisation** – we vow to put the consumer first, focus on promoting our brands and providing useful content that aligns with what consumers and search algorithms are looking for.
12. For organic **social media marketing**, we take steps and use all available functionality on the social media platforms we use to restrict any exposure to under 18s – ensuring our account is designated as adult only content, only publishing content that does not appeal to children, regularly publishing responsible gambling content and clearly marking our accounts as being for over 18s only.
13. For **paid social media marketing**, we use the controls built by the social media platforms to only show our adverts to consumers who are over the age of 25. Our ads do not include any child appealing content and we promote responsible gambling through this marketing channel.
14. We take reasonable and proportionate steps to ensure we have **oversight and approval processes** in place for all marketing material. We also have a second line marketing monitoring programme to ensure we monitor compliance with regulation and the principles set out in this policy.
15. We ensure all employees undertake **training** on responsible marketing practices while ensuring they follow the inhouse processes for full and compliant sign off by the appropriate designated senior management.

WE COMMIT TO ETHICAL DIGITAL ADVERTISING

Digital advertising is ever changing and brings its own unique set of ethical issues related to data privacy. Facebook, Google, and many other digital media companies have developed sophisticated tracking technologies in order to understand, profile, track, and target users online so that their paying advertisers can reach their exact target audience via their digital advertising products and services. As consumer attitudes and technologies change, the ethical considerations that surround digital advertising are rapidly evolving. We will continue to monitor changes across different marketing channels and update our practices accordingly.

We regularly refer to information published by the Advertising Standards Agency website regarding gambling, and we share relevant regulatory rulings and guidance with key stakeholders engaged in marketing activity.



GOVERNANCE OF THE ETHICAL MARKETING POLICY

Roles and Responsibilities

This policy has been developed by the Legal and Compliance Team, it will be submitted to the Compliance Committee for approval and any material revisions to the policy should also be approved by Compliance Committee.

The Marketing Director or equivalent of each business unit is responsible for ensuring that all marketing processes comply with this policy and that all relevant employees are made aware of the policy and its requirements.

Local marketing teams are responsible for validating all marketing materials against this policy.

Legal and Compliance Teams are responsible for checking the Group's marketing materials against legal requirements and industry standards as a means to monitor and evidence compliance as part of the Rank Group's second line of defence risk model. Additionally, they are responsible for monitoring regulatory and legal requirements and communicating any material changes in this respect to the business.

Group Internal Audit reviews the effectiveness of the Group's Safer Gambling and Compliance policies and procedures on a periodic basis as part of an agreed annual audit plan.

Management, employees and contract workers of all entities in the Rank Group are responsible for observing this policy.