

## RESPONSIBLE GAMING PILLARS

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## **Pillar 1: Responsible Gaming**

Responsible gaming is a core value of the members of iDEA. At the leading edge of promoting responsible gaming, our member companies actively address responsible gaming issues as part of their daily operations.

iDEA members educate lawmakers, stakeholders, and the general public on the benefits of legal, regulated online gaming, and industry responsibility remains a central tenet of our mission. Our members are constantly innovating to provide a safe and enjoyable experience for gaming consumers.

### **I. Education**

Education is a key component of our commitment to responsible gaming. iDEA members collaborate with industry-wide players on best practices for responsible gaming, implement effective company policies, provide resources for players to prevent and treat problem gambling, and advise legislators on regulatory frameworks that will safeguard consumers and prevent fraud.

### **II. Effective Regulations**

iDEA members advocate for gaming regulation that holds stakeholders to the highest standards of quality, and that ensures the integrity of the industry. Our members regularly meet with key legislators, head regulators, and members of the executive branch in states to advise on practical solutions for protecting consumers and to provide a roadmap to a successful legislative process for online gaming.

To that end, iDEA has developed [model legislation](#) to serve as a guide for state lawmakers looking to implement online gaming in their state as a way to grow jobs, boost state revenues, and protect consumers.

### **III. Customer Tools to Prevent Problem Gambling**

iDEA members provide consumers with tools and resources that allow them to identify risky behaviors and treat gambling problems should they arise.

Some of the tools our members implement include providing limits on the amount of money and time players can spend on gaming, and also providing players with the ability to set financial limits on their own accounts. In addition, players are given the option to self-exclude themselves, not just from individual gaming sites, but also set blanket self-exclusion across all gaming sites within a specific jurisdiction.

In addition to these tools, iDEA members provide customers with resources that are prominently displayed on their sites should they exhibit risky behaviors or develop a problem gambling issue.

#### **IV. Fairness and Openness**

iDEA members are committed to fairness and openness in business operations and customer relations. Providing consumers with the information they need to be informed, and complying with state mandated regulations and reporting requirements, our members strive to build transparent relationships with consumers of online gaming entertainment.

Our member companies provide rules, terms and conditions, and privacy policies that are easily accessible, and aim to outline the information in these documents in a way that consumers can understand.

Consumers have the right to file a complaint, and our members are committed to providing an accessible communication channel for customers and to handling any grievances in a fair and timely manner.

#### **V. Industry-wide Commitment**

iDEA members advocate for an industry-wide commitment to responsible gaming. It is up to all industry stakeholders to implement best practices to keep responsible gaming and all other forms of consumer protection at the heart of all business activities. Continuous research and education fuel our members' responsible gaming initiatives, allowing implementation of effective solutions aimed at preventing harm and providing resources for treatment if needed.

Responsible gaming is a collaborative effort, and iDEA members are committed to working together to ensure a safe and enjoyable experience for consumers and to sustain the benefits the gaming industry provides to states.

## **Pillar 2: Problem Gambling**

iDEA members encourage operators to actively monitor player behaviors and provide assistance to those who display warning signs of problem gambling. While only a small percentage of players are problem gamblers, our members strive to increase awareness and mitigate negative consequences for at-risk players by implementing preventative measures and maintaining a continuous commitment to research and education.

### **I. Preventative Measures**

iDEA members incorporate a variety of tools to help identify player behaviors that are indicative of problem gambling and also provide ways for players to self-assess and limit themselves so that problem gambling does not become an issue.

Data analytics provide valuable insight into at-risk gambling behaviors and allow operators to identify players who are potentially at risk, and to get in front of any issues before problems arise. iDEA members are committed to continuous assessment of best practices in using data analytics that accurately detect risky behaviors.

If it is determined that a player is at risk, educational resources and a variety of tools are made available to help players make informed decisions when participating in gambling as entertainment. Some strategies include:

- Stopping marketing messages to flagged players
- Sending reminders regarding the self-assessment tools available
- Providing instructions for players on how to set limits
- Providing phone numbers and other resources for problem gambling

### **II. Addressing Problem Gambling**

It is the responsibility of everyone in the gaming industry to develop policies and procedures to address problem gambling. iDEA members strive to make information on self-help tools, telephone hotlines, educational resources, and treatment centers readily available and prominently posted to help those that may be struggling with gambling addiction.

iDEA supports a collaborative environment for research and sharing of general knowledge and data, along with putting more emphasis on education so that problem gambling can be accurately spotted. Continuous research and refinement are key to accurately identify risky behaviors, incorporate effective preventative measures, and successfully treat those with gambling issues.

### **Pillar 3: Underage Gambling**

iDEA members enlist policies and procedures to keep young people safe, while providing online gaming entertainment to those who are old enough to participate. Our members work to build awareness around underage gambling, incorporate age verification tools and procedures, and provide resources to adults for preventing and treating underage gambling issues.

#### **I. Age Verification**

iDEA members enlist powerful technologies and operational measures to prevent access to gambling by those who are underage. For example, when patrons register for an online account or wish to deposit electronic funds, identity information is required and then verified by reputable third-party service providers; a common practice for online businesses.

Even after players are verified and given notice about the importance of account security, our members continue to monitor different aspects of play to determine if further investigation is required.

#### **II. Building Awareness and Empowering Parents / Caregivers**

Preventing underage gambling is everyone's collective duty. iDEA members are committed to building awareness of underage gambling by supporting and enforcing state mandated age requirements, implementing strict policies around underage gambling, and providing resources for adults with minors in their care.

Underage gambling policies are prominently posted on gambling websites so that consumers are aware of the legal age requirements, and are also aware of the penalties should a minor be identified. Operators and affiliates are committed to compliance in training employees, and to working collaboratively with legislators to further prevent gambling by minors. Efforts are also made to ensure that underage persons do not directly receive marketing messaging, and that the imagery and wording used in advertisements for gambling products or games does not appeal to children.

iDEA members encourage parents and caregivers to monitor children's online activity and provide information on how to set parental controls on computers and mobile devices. Additional resources on prevention, and identifying a potential issue, are also provided to consumers.

## **Pillar 4: Vulnerable Groups**

iDEA members acknowledge research that has identified certain populations that are at higher risk for problem gambling than others, and work to develop effective preventative measures and strategies for intervention.

Since it is not always obvious when such vulnerabilities exist, building a profile of customers, and training staff to know the signs, assists operators in identifying customers that present an increased risk.

Data shows that, for multiple reasons, some groups are at higher risk for problem gambling than others. Some of those include:

- **Young adults:** some research has shown that young adults are at an elevated level of risk, as they may be less familiar with commercial gambling products, more likely to have a lower level of income, or more inclined to act impulsively.
- **Mental illness:** individuals experiencing poor physical or mental health or physical or cognitive impairment, such as those suffering side effects from a brain injury or medication.
- **Socioeconomics:** individuals experiencing financial difficulties (inability to make essential payments, excessive borrowing), those that are homeless, are suffering from domestic or financial abuse, have caring responsibilities, are experiencing a life change (such as bereavement) or sudden change in circumstances (such as loss of employment, or conversely a significant windfall).
- **Existing addictive behaviors:** individuals who potentially suffer from another disorder (i.e. drug or alcohol abuse). Research has consistently shown that problem gamblers tend to have other comorbid disorders.

Our members are committed to continuous research on building awareness of customers who are potentially vulnerable, and therefore more susceptible to experiencing gambling harms. Our members also implement best practices and consider how best to manage the risk of problem gambling in vulnerable groups. Some of the actions our members take include the following (remember that vulnerability is a complex issue, and not every case requires the same action):

- Raising awareness of responsible gaming through targeted communications;
- Encouraging the customer to set limits on their gambling;
- Motivating the customer to take a break from gambling or provide tools to self-exclude;
- Enhancing monitoring of the customer's behavior (for example, it may be sensible for the operator to set risk thresholds at lower levels);
- Intervening directly, which sometimes includes the enforcement of limits or termination of the relationship;
- Including signposting to free, professional help and support resources (particularly when the operator has opted to terminate the relationship).

## **Pillar 5: Fraud Prevention**

iDEA members understand that preventing fraud makes the online gaming space a safer place, and a more sustainable one too. Our member companies implement the latest tools and technologies to detect fraud, confirm identity, and help educate consumers on how to identify safe and trusted online gaming sites.

### **I. Technology**

Bad actors attempt to exploit online gaming websites and customers in order to enact fraud in a variety of ways. Our members utilize various technologies to confirm player identification. One of these is geolocation, which confirms to operators whether a user is where they claim to be. Another is a rigid identity verification onboarding process that is difficult for scammers to skip; one that includes device fingerprinting, email analysis, and IP analysis, so fraudsters can't register multiple accounts with the same computer or mobile device, using the same email from the same location. Tools like KYC [Know Your Customer] protocols ensure that registered gamers are showing up in good faith.

With an abundance of third-party technology solutions, our members don't stop checking for fraud after the initial registration step. Our members collaborate with third-party solutions that specialize in this kind of fraud prevention, which means they can confidently tell customers that their data is protected. Additionally, operators have the ability to monitor player data and keep it confidential so that no one else can access it —including would-be identity fraudsters.

### **II. Know Your Customer (KYC) Protocols**

iDEA members are committed to Know Your Customer (KYC) protocols. Users are accustomed to verifying their identity on any website that handles secure transactions, and our customers are not only aware that they benefit from these measures; they also expect them.

Our members often use third-party tools to keep customers safe and prevent fraud. Some of the most common data protection measures they use include:

- ID verification
- Age verification
- Cross-referencing with Voluntary Self-Exclusion watchlists
- Cross-referencing with deceased records

Most importantly, if there is any doubt, our members flag suspicious activity and investigate before transactions are cleared to proceed.

### **III. Anti-Money Laundering (AMT) / Counter-Terrorist Financing (CTF)**

Our members are committed to protecting consumer financial data and combatting cybercriminal activity by continuously tracking monetary transactions, executing KYC protocols, and utilizing other data analytics. Our members enlist strict policies and procedures around anti-money laundering (AML) and counter-terrorist financing (CTF).

Prevention of cybercriminal activity involves an industry-wide commitment to education, knowledge-sharing, and best practices. Our members have an obligation to ensure that their employees are properly trained on preventing fraudulent money transactions, and making sure that they are aware of what is expected of them within their roles. Educating staff and other stakeholders on the consequences of illegal activity is crucial in building an industry-wide culture that is committed to combatting online criminals.

Monetary tracking is a continuous process. Through the course of a player's entire experience on a gaming website, our members aim to keep them safe by looking for anything out of the ordinary. By collecting data tied to monetary transactions, behavioral anomalies and potential compromises can be more easily detected.

### **IV. Identifying a Trusted Gaming Site**

iDEA members know that gaming is first and foremost a customer service industry. Behind-the-scenes fraud prevention is important, but so are customer-facing methods to help users feel secure. iDEA members actively work with state legislators and regulators to educate the market about what indicates a safe, trusted gaming site and to flag offshore or untrusted sites before they can defraud players.

One of the most visible ways gaming sites can indicate trustworthiness is to prominently present credentials on their site. Like any other regulated market, legal participants in the online gaming industry have copyright, trademark, and corporate information clearly visible to visitors. State regulatory bodies may also have credentialing requirements, and players should look for those.

## **Pillar 6: Sports-Betting Integrity**

There are substantial illegal sports betting operations around the world that make players vulnerable and threaten the integrity of the game. The goal of our members is to move players to legal sites that provide a safe and trusted environment and encourage the integrity of the game.

### **I. Match-fixing and Spot-fixing**

Match-fixing is an illegal activity whereby a result of a sports game, or even a virtual esports, would be manipulated. Spot-fixing relates to manipulation of an event within the game linked with a proposition bet. It is of crucial importance to educate stakeholders about what match-fixing and spot-fixing look like.

Our members in the sports betting space commit to having sports integrity policies and to training their employees to follow them. Integrity policies include a roadmap for reporting instances of sports manipulation, not only to their gambling regulator, but to leagues and colleges themselves. Our members also strive to collaborate with sports-governing bodies to mitigate the impact and prevent these instances from happening.

### **II. Integrity**

Sports betting integrity is inextricably linked with the integrity of sports themselves. One of the key obligations of operators in that regard is to collaborate with sports leagues, colleges, and others in this space. Our members use sports integrity monitoring tools and mechanisms that allow them to identify any instances or incidents, or events of match-fixing.

Our gaming operators are cautious of the way they portray gaming in marketing materials and advertisements. They avoid the portrayal of gambling as a lifestyle or a career, but rather show it as the pastime that it is.

Our ultimate goal is to make sure the general public can have trust in the games they watch, knowing that they are viewing fair play and not being hoodwinked by manipulation. Careful collaboration between operators and sports-governing bodies is key to holding stakeholders responsible and keeping manipulation out of sports.

## **Pillar 7: Advertising and Marketing**

iDEA members voluntarily adopt responsible advertising and marketing behaviors and remain committed to ensuring a culture of safe gambling to protect children and vulnerable groups. In practice, this means that our members are committed to conducting business in a fair and transparent way, particularly in relation to marketing, advertising, and promotions. In order to continue to improve safeguarding, iDEA members cooperate to ensure that measures taken are agreed upon collectively within the industry to guarantee a safe and enjoyable gambling environment for everyone.

### **I. Compliance**

Our members are committed to compliance with advertising codes and to ensuring that certain advertisements are not served to certain online browsing profiles; for example, advertisements or sponsorship links do not appear on website pages that are targeted to children.

As a result of global compliance and enforcement activity, standards are continuously improving, although some operators can do more to ensure that their marketing communications are transparent and socially responsible to avoid the risk of enforcement action for misleading marketing practices and potential financial penalties.

### **II. Messaging**

The advertising of gambling products and services should be undertaken in a socially responsible manner and must not mislead consumers. All rules, and terms and conditions which apply to marketing incentives, must be provided transparently and prominently and be made available for the full duration of the promotion.

Protecting children is a top priority. Our members are committed to preventing access to gambling by persons who are not of legal age, as well as working to prevent advertising from targeting minors. Marketing communications are crafted in a way that does not appeal to children or teens, particularly if they are generally available to be viewed by them. Efforts are made to ensure that underage persons do not directly receive marketing messaging, and operators are mindful of the imagery and wording used in advertisements for gambling products or games.

As part of this process, our members pay particular attention to advertisements that:

- Trivialize gambling (e.g. encourage repetitive or frequent participation);
- Refer, even indirectly, to indicators of problem gambling behavior (e.g. solitary play, playing late at night, pre-occupation with gambling, or isolating oneself from others);

- Refer to personal problems (e.g. that gambling can provide an escape);
- Seek to exploit financial concerns;
- Appear in media for those under legal age requirements;
- Appear in other media where minors are likely to comprise more than 25% of the audience;
- Are targeted at those who are known to be, or are likely to be, underage through the use of data such as that available on platforms like social networking sites, video sharing platforms, and online display ad networks.

### **III. Placement**

iDEA members are cognizant of ad placement, ensuring that digital advertisements are not displayed on websites providing unauthorized access to copyrighted content and do not knowingly engage in the distribution of unsolicited advertisements (i.e. SPAM), either directly or through a third-party. In doing so, our members take all reasonable steps to ensure that they are responsible for the actions of their third-party partners, including marketing affiliates.

### **IV. Volume**

Subject to the particular nuances of each jurisdiction, unless expressly permitted by law, consumers must not be contacted with direct electronic marketing without their informed and specific consent. If required, operators must be able to provide evidence which establishes that consent.

Whenever a consumer is contacted, the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn, as soon as practicable, our members ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again.