



**Global
Gambling
Guidance
Group**

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Wireless Gambling
Code of Practice



Introduction

G4, the Global Gambling Guidance Group, aims to minimise the impact of problem gambling by promoting a worldwide accreditation programme.

In many parts of the world the gambling industry is being urged to develop responsible gambling programmes to minimize the impact of problem gambling on communities. This pressure has come from governments, from industry regulators and from the communities themselves.

G4 is the brainchild of a group of international experts in the field who come from the Netherlands, Australia, U.K. and Sweden. Between them they have many years experience of working with the gambling industry worldwide to encourage responsible gambling and to minimize the harm caused by problem gambling. Their experience covers drafting responsible gambling programmes and devising and delivering training programmes for staff in gambling venues, as well as running help lines and face-to-face counselling services for problem gamblers themselves.

These experts have designed an accreditation programme that will set the international benchmark for responsible gambling. This accreditation programme will provide a model for the gambling industry and an opportunity for companies to demonstrate how seriously they take the concerns of local communities.

Wireless Code of Practice

The following Code of Practice recognises that Wireless Gambling is a specific and distinctly different form of gambling from land-based and offshore gambling industries.

The Code is to be used as a guide only and must be matched to the local legislation applying to the relevant jurisdiction.

The Wireless Gambling Company's Mission Statement

The Company acknowledges that, while most people participate in gambling activities in a socially enjoyable and harmless manner, gambling can create problems for some individuals. The extent of these problems ranges from occasional over-spending to the development of pathological gambling addictions.

The Company seeks to create a responsible gambling environment and is committed to implementing and maintaining Responsible Gaming legislation and best practice for the benefit of customers, staff and management.

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Corporate Standards

Licensing

The company must have a license **similar to** that which applies to other members of the gaming industry such as casino operators and gaming machine operators. The objective of the licensing scheme is to protect the public interest through ensuring high standards of honesty and operational ability of the gambling service provider and probity checking any other party that is in a position to directly or indirectly benefit financially from the conduct of the gambling service.

On the site it must be possible for the customers, and others, to actively view the regulations governing the company's business either directly or by links to relevant Regulator's websites.

Technical operation

The company must have a 'control system' that is approved by the government regulator or other appropriate authority. This control system is about trust. It is essential that the customers can trust the company's technical system for fair games; for example, whether or not the computer-generated game of Bingo offers fair odds to the player. The control system must be a system of controls containing all the rules, terms and conditions and other matters displayed to a player and all internal controls for the proper conduct of Internet games. The company should display on the site the documents that explain their control system, who has approved it and who is supervising it.

Audit and inspection

The company should allow regulators to test, evaluate and audit systems and procedures at the service provider's premises by inspecting records, examining equipment and testing software in use.

Credit gambling

The company is not permitted to give direct credit. A wireless gambler will be able to deposit money into their gambling account. The company's conditions for which credit cards they accept should be easy to read and be displayed by pictures.

Money laundering

The company should take all measures possible to identify all transactions especially those that bear the characteristics of money laundering activity.

Taxation

The company must on the site inform the clients of any arrangements regarding taxation of prizes.

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Privacy

The company must control and guard the privacy of the customer. This must be done both in a technical way so that the customer information database is stored securely, and that all the laws in the jurisdiction are adhered to. If the customer asks to view the information it should be made available.

Operational e-Gambling Code of Practice

1. Age verification

- a) Sites must take steps to verify the age and identification of every new paying customer, this has to be done before a bet is placed or before registration. This is especially important in all cases where the method of payment does not itself constitute an age check (e.g. debit cards). Sites should either employ the use of a reliable electronic checking system or request visual proof of age and ID such as driving licence or passport.
- b) The Company should display an 'over 18's only' or other legislated age requirement sign on their home page. This information has to be shown before betting or before registration.
- c) Sites must also clearly display that underage play should not take place even in the company of parents or other adults over the legal gambling age. This must be shown in the Terms and Conditions on the cell phone or on the website of the provider of the services.
- d) Through the registration process there should be a clear message regarding underage play and the steps the Company takes to check on age. This will act as a deterrent to put minors off trying to access a Company's site.
- e) When the age verification systems in place are not totally effective the site should not be allowed to accept payments from cards that are available to those under the legal gambling age. This should also include third party payment systems that accept those cards as well – such as neteller, firepay, paybox etc.

2. Reality Checks

It is vital that, where a game allows continuous, interactive and rapid gambling without a natural break, there should be mechanisms implemented that help the customer to monitor their spend and amount of time they have played so they can make conscious decisions on whether to stop or continue.

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As well as a default session limit which will close a game after one hour of continuous play, the following are also recommended:

- a) The currency unit of the amount wagered should be clearly displayed on the games screen as well as the denomination of each credit.

Where a game allows the player to choose different amounts per credit, this option should involve having to come out of the game in order to change credit size. This will help to avoid the possibility of customers impulsively increasing their stakes in order to chase losses.

No game should be quicker than 3 seconds between plays, even in 'turbo' mode.

The operator should seek guidance from the regulator on which games would require the implementation of suitable reality checks.

3. Self Exclusion

This information should be made available on the website of the company offering the gambling services. That the information is available should be presented at least once to the customers at a stage during the registration process or just after the registration process.

- a) The player should be able to exclude themselves from making any bet on a site
- b) The period of self-exclusion must be for at least 6 months
- c) Information regarding the self-exclusion policy and process must be clearly explained within the responsible gambling/player protection page.
- d) The site may also provide a 7 day cooling off period as well as the full 6 month exclusion opportunity. However once a customer has excluded themselves 3 times via the 7 day period option they should be automatically excluded for at least 6 months.
- e) Once a player has excluded themselves from the site, they should be taken off any mailing list that they have subscribed to on the Company's site and their database record should be flagged to prohibit mailouts/promotions during the self-exclusion period.

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4 Social responsibility / Player protection information

The provider of mobile gambling should make a website available which contains a link to the Company's social responsibility partner. The availability of this website should be presented at least once during or after the registration.

The site's home page should also contain a link to both the player protection page and responsible gambling page. This information must be placed in strategic places on the site, to provide information on problem gambling, self-test, self-exclusion and counselling possibilities. Strategic places for this information might be the gambling account, the self-test and where the gambler set the limits for time and betting.

- I. The social responsibility page should contain at a minimum:
 - a. A warning that gambling could be harmful if not controlled and kept in moderation.
 - b. Advice on responsible gaming and a link to the social responsibility partner and other sources of help on problem gambling, including helpline number(s).
 - c. A link to an accepted and simple self-assessment process to determine risk potential.
 - d. A list of player protection measures that are available on the site, and a link to that page (if separate to the social responsibility page).
 - e. Details or a link to a page with details, of the Company's social responsibility policy.
- II. The player protection page information should contain the protection measures available to the player if they wish to use them.

These measures should be the options on customer determined spend limits, customer determined session limits and the self-exclusion instructions with a link to the email address required or button(s) for automatic exclusion.

- III. The deposit page should contain a reminder to the customer about the need to gamble responsibly, with a link to the responsible gambling/player protection page.
- IV. Messages of a Company's support of social responsibility should not be misleading. (*i.e. a Company should not claim to be a member of or have support for a social impact or support organisation if this is not true.*)
- V. The Company may also send an sms-message after a certain period of time, to remember the customer to gamble responsibly.

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5 Advertising and promotional material

- a) Advertising and promotions must be compliant with the relevant regulatory and advisory codes of practice.
- b) Advertising should not target those under the legal gambling age. This includes not just content but placement of advertising as well.
- c) Advertising should give a balanced message with regards to winning and losing.
- d) Customers should not be encouraged to chase their losses or re-invest their winnings.
- e) At no time should it be suggested that gambling is a means of solving financial difficulties.

6. Customer account

- a) The customer should only be allowed to use or register one card/credit card or other form of payment on their account. If for whatever reason they need to change that card they should have to go through the customer service line.
- b) The customer should also only be able to register one account on a site, rather than multiple accounts with the same name and address but with different user names.

The ability to set up multiple accounts using multiple credit cards not only increases the possibility for fraud, but also increases the risks of problem gambling and uncontrollable debt.

7. Customer led spend limits

- a) Whilst sites should still be able to set their own limits on player spend and even vary those limits on an individual basis, sites should also provide the ability for the customer to determine their own spending limits as well. This is important in empowering the customer and making them responsible for their own gambling decisions.
- b) Sites should provide options for setting limits on customer spend per day, per week and/or per month.
- c) The minimum amount for spend should be the same as the minimum deposit required on the Company's site, with the maximum spend going up to the site's set limit.

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- d) When a player reaches their previously set limit the operator will be responsible for ensuring that no other bets are accepted from them.
- e) The player can only increase their previously set limit once a cooling off period of at least 24 hours has elapsed. However they should be able to decrease their limit with immediate effect.
- f) The option to set spend limits may be offered before or during the first deposit

9. Training and support

The Company should ensure that their customer service team are trained on the issues of social responsibility and problem gambling. This is especially important for the occasions when a problem gambler, or a third party, will contact the customer service line, or when the Company suspects one of their customers may have a gambling problem. This training should be refreshed on a yearly basis.

10. Play-For-Fun or Free Play

Where Play-For-Fun or Free Play is offered, the following conditions must be met:

- a) the free games must mirror the real games in payout percentages and method of play;
- b) the free games must offer the same age restriction, social responsibility and player protection information as the real money site;
- c) players must register with a verified email address at a minimum; and
- d) players should have time session limits imposed.

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