

GAMING
RESPONSIBLE
GAMING

**COMPLETE GUIDE TO
RESPONSIBLE GAMING**



The experience of the main gaming and betting markets in the world shows that the exploration of these activities must always be accompanied by Responsible Gaming (RG).

Therefore, the development of the gaming and betting industry in Brazil demands the application of Responsible Gaming (RG).

Despite the relevance of this topic, there is few material explaining what Responsible Gaming is and how to apply it.

What is Responsible Gaming with social responsibility?

01

Responsible Gaming is the operation of gaming in a socially responsible way.

In other words, it is the development of gaming activities with the **adoption of measures to prevent, mitigate and remedy potential social harmful effects** of gaming.

The purpose of gaming is to provide entertainment and fun for people.

However, there are cases when it can bring negative situations for those who take part in the activity.

Although such cases have proportionally low numbers, companies involved in the operation of gaming must adopt measures to mitigate the negative effects, working with social responsibility.

Responsible Gaming is applied in which activities?

02

All gaming activities, such as betting and lotteries, must adopt Responsible Gaming rules.

In Brazil, lottery activity is the main gamble authorized by law.

There are several types of lottery games, and four are the best known:

01

PASSIVE GAME

Pre-numbered lottery ticket game.

NUMBERS GAME

02

Game in which the player chooses the numbers that will be drawn.

INSTANT GAME

03

Game in which the player chooses the numbers that will be drawn

SPORTS BETTING FIXED ODDS

04

Considered a lottery in Brazil, sports betting events are carried out on sporting events and have previously fixed prizes (the famous odds).

**Responsible Gaming
must be applied in all
these activities.**

Who is Responsible Gaming for?

03

Responsible Gaming is intended for all stakeholders in the operation of gaming.

The main responsible for applying the rules of this practice is the gaming operator, who must have a Responsible Gaming Program and commit to comply with it.

Without the operator's commitment, the chance of successful responsible exploitation of gaming greatly reduces.

Besides the operator, all companies involved in the gaming operation, directly or indirectly, must also have knowledge about the actions and practices related to Responsible Gaming.

Therefore, payment facilitation companies must also have a Responsible Gaming Program and must dedicate efforts to ensure that their customers comply with the rules and guidelines for socially responsible gaming.

In addition, Responsible Gaming is also aimed at athletes, clubs and sports associations, especially to prevent match-fixing activities..

At last, the main recipient of Responsible Gaming is the player.

All Responsible Gaming Programs must dedicate themselves to promoting gaming in a healthy way for the player, who must be informed about this.



How is Responsible Gaming applied?

04

Responsible Gaming begins with the **development and the implementation of a Responsible Gaming Program, which must contain the principles and rules** of this activity for the gaming operation.

The implementation of the Responsible Gaming Program depends on the adoption of various specific rules that seek to prevent, mitigate and remedy potential social harming effects from gaming.



The principles of Responsible Gaming

05

Responsible Gaming principles and actions vary widely according to each country.

However, it is important to bring the principles of Responsible Gaming established by the WLA – World Lottery Association.

This is an important international standard, whose primary function is to establish minimum action requirements for lottery operators.



The seven principles of Responsible Gaming of WLA are:

01

Company's commitment to adopt reasonable and well-considered measures to achieve it's objectives while **taking care to protect the interests of its consumers and vulnerable groups**, while upholding commitments to defend public order within its own jurisdiction of action.

02

The company must ensure that its practices and procedures **reflect the regulations issued by state agencies**, its self-regulation and individual responsibility.

03

The company must develop **practices concerning Responsible Gaming and related issues on the fullest possible**, in order to understand relevant information and analyze documented research.

04

The company shall **work with stakeholders, including governmental and nongovernmental entities**, regulators, researchers, healthcare professionals, the general public, to share information, develop research and promote Responsible Gaming as broadly as possible, and encourage a better understanding of the social impact of gaming.

05

The company must **promote only legal and responsible gaming** in all aspects of its activities, including development, sale and marketing of its products and activities, and will endeavour to ensure that its agents act in the same way.

06

The company must **provide the public with information, in an accurate and balanced manner**, to enable individuals to make informed decisions and choices about gaming-related activities in the lottery jurisdiction explored by the company. This commitment requires that:

- the **marketing of lottery activities** and products is subject to the company's self-regulation and promotes Responsible Gaming practices and informed choices.

- **accurate information** about gaming and its associated risks to individuals is provided, for example, an education program is organized.

07

The company shall **make reasonable efforts to monitor, test and review, when necessary,** activities and practices related to Responsible Gaming. The conclusions reached by the company must be publicized.

When we mention the **“company”**, we refer to every company that is in the gaming exploration chain and must adopt a Responsible Gaming Policy, as already mentioned.

Responsible Gaming areas of activity

06

According to WLA standards, Responsible Gaming has mainly 10 distinctive areas of activity, which are

Investigation

Employee training

Reseller training

Product development

Online gaming channels

Advertisement and marketing

Education, information and
transparency with players

Referral of players

Stakeholder engagement

Monitoring and reporting

In the sequence, we will talk a little about each one of them.

Research and investigation

The company must conduct impartial, evidence-based studies and research to obtain data regarding the development of its Responsible Gaming Policy and its effectiveness.

The promotion and encouragement of research related to Responsible Gaming includes:

Active participation in Responsible Gaming research;

Funding and/or support to independent research related to the company's Responsible Gaming Policy.

Research must be focused especially on players, but should also cover the impact of Responsible Gaming on the community at large.

The main objectives of the research to be held are:

Players' impression of the relevance and sufficiency of the Responsible Gaming Policy at gaming venues, including its influence on player's decisions;

General awareness of the main aspects related to gaming and how games work;

Evaluate activities and behaviors considered at risk to the health and habits of players;

Evaluate the effectiveness of the employee training program;

Evaluate the effectiveness of the resellers training program;

Explore areas for Responsible Gaming Policy development

The company should consider using the results of research on its **Responsible Gaming Policy as an element in the strategic and operational management decision making** of the games it operates.

Training and qualification of employees

The company must carry out training and qualification of employees to build relevant and practical knowledge regarding Responsible Gaming measures applicable to their duties.

The training aims to reinforce the values that the Responsible Gaming Policy seeks to implement, not only for players, but for employees and the public at large.

The conduct of regular training and qualification of company employees concerning the Responsible Gaming measures, practices and instruments provided for on this Responsible Gaming Policy and other company documents also seeks to raise awareness and sensitize employees regarding problems related to gaming.

Training and qualification in Responsible Gaming **directed to all employees include the following points:**

Guidance on prohibiting gambling for underage individuals;

Deepen knowledge about main concepts of game, instruments and resources;

Training employees to respond to players who demonstrate conduct that signals a possible problem with gaming;

Relevant and specific guidance for each employee, to promote Responsible Gaming in their respective role.

In addition, annual training must be carried out to reinforce initial qualification. **The quality and effectiveness of training will be measured through employee evaluations.**

Training of resellers and distributors

The training of resellers and distributors regarding Responsible Gaming and its actions and instruments is fundamental to the success of its objectives, as players have great contact with these professionals.

The company must provide specific training for resellers and distributors concerning Responsible Gaming and its instruments. This training must cover the following topics:

Principal gaming and Responsible Gaming concepts.

Identification of conduct contrary to the Responsible Gaming Policy.

Use of the Responsible Gaming Policy to respond to player's conduct considered harmful.

Resources to deal with problem gambling.

Comprehension of the role of the reseller and distributor in the company's Responsible Gaming Policy, as well as your responsibility.

Increased awareness of gambling-related problems and signs of harmful conducts.

With this, the company will inform resellers about the Responsible Gaming measures, practices and instruments adopted in its Responsible Gaming Policy.



Product development

The company must always consider the elements of Responsible Gaming on the development its games.

Therefore, the games and products developed by it will be low risk and must not have any special appeal to vulnerable groups and underage.

An evaluation of the social impact of games developed by the company, new or already in operation, must also be carried out and reformulate them if scientific data demonstrate factors that increase the risks associated with gaming due to characteristics of the product offer.

It is necessary to define strategies of offering that mitigate the risks related to gaming that are identified by studies and prior evaluation of the social impact.

Online gaming

The company must implement protection and self-protection mechanisms for players in all online games, including prohibiting the sale of games to underage and the possibility of self-exclusion.

Another fundamental aspect of Responsible Gaming is ensuring the protection of players' data, in accordance with established legal requirements, especially those provided for in the General Data Protection Law (LGPD).

In this sense, the company must adopt a data protection policy and maintain the operating system, capable of meeting the stricter standards to guarantee the confidentiality, integrity and availability of data, looking for the necessary certifications to ensure these technical requirements.

Advertising and marketing code for Responsible Gaming

Advertising and marketing carried out by the company must follow **all Responsible Gaming principles**.

Therefore, a set of principles must be adopted to guide advertising and marketing activities, especially when promoting the sale of games operated by the company.

Advertising, marketing and sales promotion activities **must not:**

- **display underage individuals** in leading roles in advertising materials;
- contain symbols, figures, models or celebrities whose purpose is **to attract underage individuals**;
- appearing in **media aimed at underage** or in places where the majority of the audience is made up of underage;
- display advertising in areas close to **schools**;
- be based on themes or languages **that appeal to underage**;

- **promote or encourage excessive gaming habits**, nor convey false probabilities of winning or a sense of urgency to place bets;
- be **addressed to vulnerable groups**, such as underage and players with gambling-related problems;
- **be discriminatory**, especially by reason of nationality, religion, gender or age;
- explore individuals' financial concerns or **present gaming as an alternative to work**, as a way of achieving family, social or financial success, or as a way of solving personal problems;
- promote irresponsible gaming or **encourage people to gamble** beyond their financial resources;
- suggest that gaming **can bring relief from financial problems or financial difficulties**;
- include images of **intoxicated individuals**;
- **falsely represent the player's chance of winning the prize**;
- **provide false information, false promises** or misrepresentations of lottery products.

Measures must be adopted with sales channels and distributors so that advertising and information prohibiting sales to underage are visible.

It is important to develop instruments and procedures for prior verification of advertising pieces, in order to ensure compliance with Responsible Gaming rules.



Education, information and transparency with players

Transparency and consumer information are fundamental characteristics of a Responsible Gaming Policy.

Thereby, players must be provided with detailed and clear information about the characteristics of the games, betting mechanics, prize rules, winning probabilities and the principles of Responsible Gaming. This allows players to make informed decisions about gaming.

Must also be made available recommendations for adopting and maintaining moderate gaming habits, and signs of problem gambling, as well as providing information on places and ways to obtain specialist advice, if necessary.

It is important to carry out campaigns and adopt measures to raise awareness and sensitize players and the public at large, through their marketing and communication channels, regarding the Responsible Gaming, restrictions on the sale of games to underages and the risks related to pathological gambling.

Referral of players

Active engagement with governmental and non-governmental entities and professionals specialized in the care and treatment of pathological gambling situations is important in the implementation of Responsible Gaming.

The objective is to contribute to the development of these services and deepen understanding the impact of the gaming offer on players and society at large.



Stakeholder engagement

Active engagement with stakeholders should be promoted so they share the same view on issues related to problem gambling and responsible gambling measures and practices.

Stakeholders are understood as not only researchers, collaborators, resellers, distributors, suppliers, players, the general at large and entities and professionals specialized in dealing with problem gambling situations and Responsible Gaming issues, but also others with a specific interest in this subject, especially entities with direct action in the areas of health and social support, associations or groups of consumers, players and lotteries.

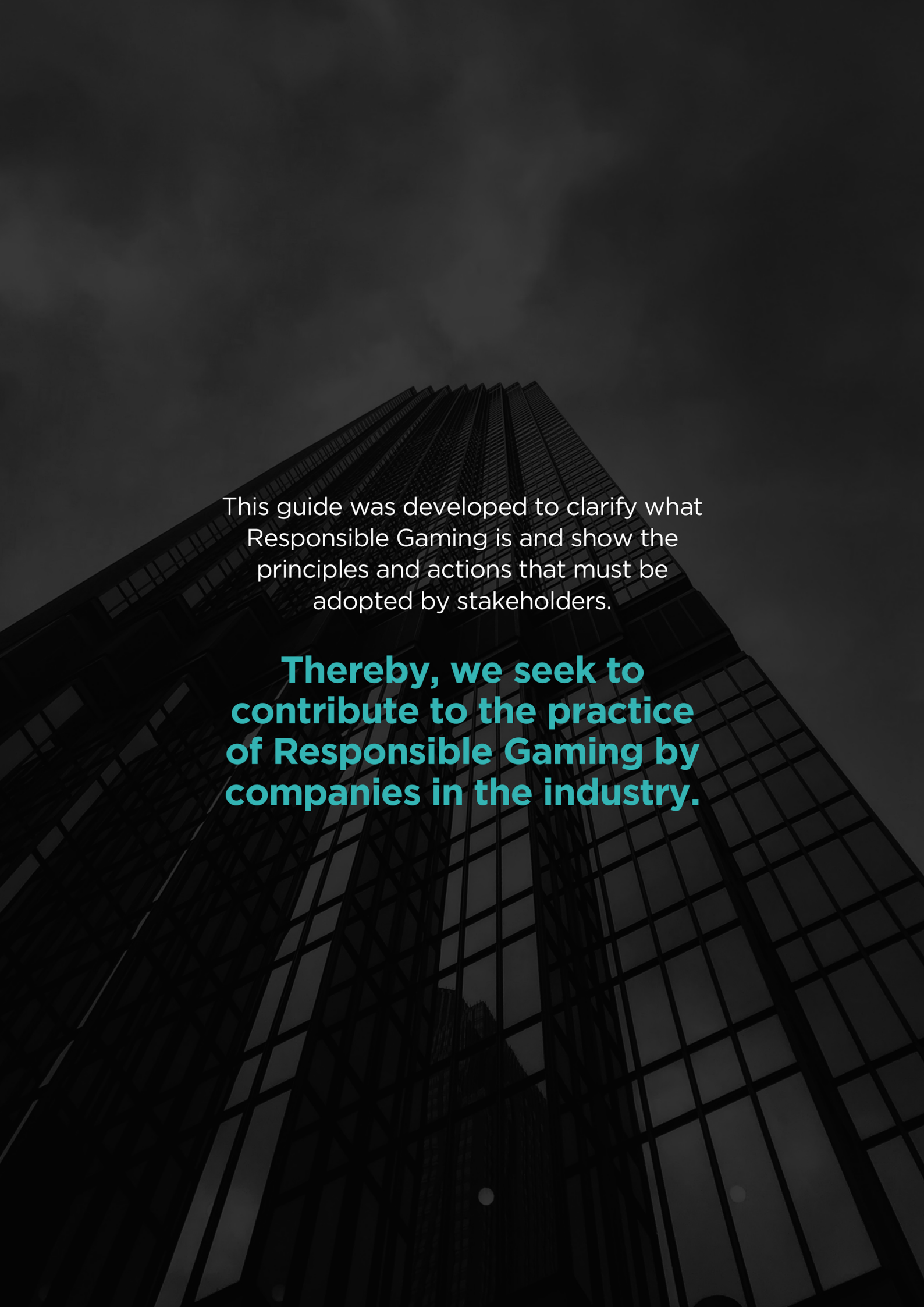
Partnership with entities related to research and treatment of problems related to gambling, in order to obtain guidance in decision-making, is an important tool of Responsible Gaming.

Monitor, reports and certifications

The implementation of Responsible Gaming requires constant evaluation and monitoring of results by the company.

In this context, a regular report of the company's performance within the framework of Responsible Gaming must be carried out, as well as monitoring meeting its objectives, development of planned actions and results achieved.

The results of this monitoring must be consolidated in a report, which will be published and shared with stakeholders.



This guide was developed to clarify what Responsible Gaming is and show the principles and actions that must be adopted by stakeholders.

Thereby, we seek to contribute to the practice of Responsible Gaming by companies in the industry.

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PayBrokers Group

The PayBrokers Group consist of companies that form a financial ecosystem on three fronts of action:

- PayBrokers eFX, specialized in payment processing for international companies in the brazilian market;
- PayBrokers IP, payment institution with digital wallet focused on the brazilian market;
- PayBrokers Lotteries, division focused on regulated state and federal lottery operations.



PayBrokers is associated with Cibelaé Corporación Iberoamericana de Loterías y Apuestas de Estado, and has implemented policies aimed at good practices in the lottery segment in Brazil.



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