

EGBA STANDARDS

***THE FRAMEWORK, PRINCIPLES AND STANDARDS TO WHICH EGBA MEMBER OPERATIONS ANNUALLY
SUBSCRIBE, COMMIT AND ADHERE TO.***

FEBRUARY 2011

FOREWORD

ABOUT THE EGBA STANDARDS

The European Gaming and Betting Association (“EGBA”) recognises the importance of ensuring that its Members operate and manage remote gaming and betting activities in a responsible, secure, safe and reliable environment. Consequently, the EGBA and its Members have investigated industry best practice, leading jurisdiction and state monopoly standards for the appropriate Standards to operate within, to ensure that the interests of its customers, industry stakeholders and regulators are protected.

The ensuing EGBA Framework, Principles and Standards incorporate this effort and is required to be adopted by all EGBA members to demonstrate commitment to a transparent and regulated industry. This commitment is underpinned further by a rigorous independent assessment of EGBA Members that is performed annually in order to substantiate compliance. Bearing this in mind, the EGBA Standards contained in this document are not meant to replace but rather complement the legislative requirements imposed by licensing jurisdictions.

PRINCIPLES ON WHICH EGBA STANDARDS ARE BASED

The term “Principle” is used extensively within the confines of this document and is therefore briefly explained. A “Principle” sets the directive from which a set of Standards can be derived. The Principles to which each EGBA Member subscribe and which forms the basis of the resultant EGBA Standards contained within this document are referred to below.

PRINCIPLE 1 – PROMOTE RESPONSIBLE GAMBLING AND BETTING

The EGBA Members are committed to promoting socially responsible gambling and betting, and working with customers, employees and relevant industry stakeholders to help manage and control problem gambling. EGBA Members will ensure that proper controls are established, implemented, and enforced, and that gambling and betting takes place in a responsible gaming and betting environment.

PRINCIPLE 2 – KNOW-YOUR-CUSTOMER AND PREVENT UNDERAGE GAMBLING AND BETTING

The EGBA Members will seek to implement all reasonable measures that prevent underage individuals from accessing gambling and betting products. EGBA Members will ensure these measures address appropriate age verification and know-your-customer controls, and with help from industry stakeholders and governments, continuously improve the coverage, quality and effectiveness of real-time verification.

PRINCIPLE 3 – ZERO TOLERANCE OF FRAUDULENT AND CRIMINAL BEHAVIOUR

The EGBA Members will not tolerate fraud or criminal behaviour, and strict security measures and gaming supervision will be implemented and enforced to prevent fraudulent activity and any transactions suspected of being potentially connected to money laundering or other criminal activity.

PRINCIPLE 4 – PROTECT CUSTOMER PRIVACY AND SAFEGUARD INFORMATION

EGBA Members will ensure that the privacy and confidentiality of all customer information submitted at any point in time is maintained and protected from unauthorised or unnecessary disclosure.

PRINCIPLE 5 – PROMPT AND ACCURATE CUSTOMER PAYMENTS

EGBA Members will ensure prompt and accurate processing of winnings and payment requests, subject to appropriate and necessary checks and verification.

PRINCIPLE 6 – RIGOROUS INDEPENDENT ASSESSMENT OF PRODUCT FAIRNESS AND RANDOMNESS

The EGBA Members are committed to ensuring that gaming and betting products are subjected to continuous and rigorous independent assessment to ensure products continue to operate in a fair and random manner, and in accordance with published rules.

PRINCIPLE 7 – ETHICAL AND RESPONSIBLE MARKETING

EGBA Members will endeavour to employ well balanced advertising and marketing campaigns in line with responsible gaming and conduct Principles.

PRINCIPLE 8 – COMMITMENT TO CUSTOMER SATISFACTION AND SUPPORT

The EGBA Members are committed to providing customers with an enjoyable gaming experience with access to 24/7 support, where they can be assured of timely resolution of disputes.

PRINCIPLE 9 – RESPONSIBLE PRACTICES UNDERPINNED BY A SECURE, SAFE AND RELIABLE ENVIRONMENT

EGBA Members will operate gaming and betting products within an internal control environment that is in line with best practice and which supports the objectives of a secure, safe and reliable environment.

THE COMMITMENT FROM EGBA MEMBERS

The EGBA Framework, Principles and Standards have been established to provide senior management within each EGBA Member with the necessary direction and support to sustain the goals of a transparent and regulated industry. Each EGBA Member agrees and grants its full support and commitment to operate and enforce the Principles and Standards as outlined in this document, and to operate within the required Framework.

This commitment extends to allow for an annual audit of compliance with the Standards by an independent and professional third party, and the reporting of findings to the EGBA board.

LEGISLATIVE REQUIREMENTS

Where legislative requirements imposed by licensing jurisdictions conflict with these Standards, compliance with the licensing jurisdictions' requirements takes precedence.

However, if an EGBA Standard provides a greater degree of customer protection than a jurisdiction requirement, while still complying with the jurisdiction's legislation, then the Standard shall be implemented.

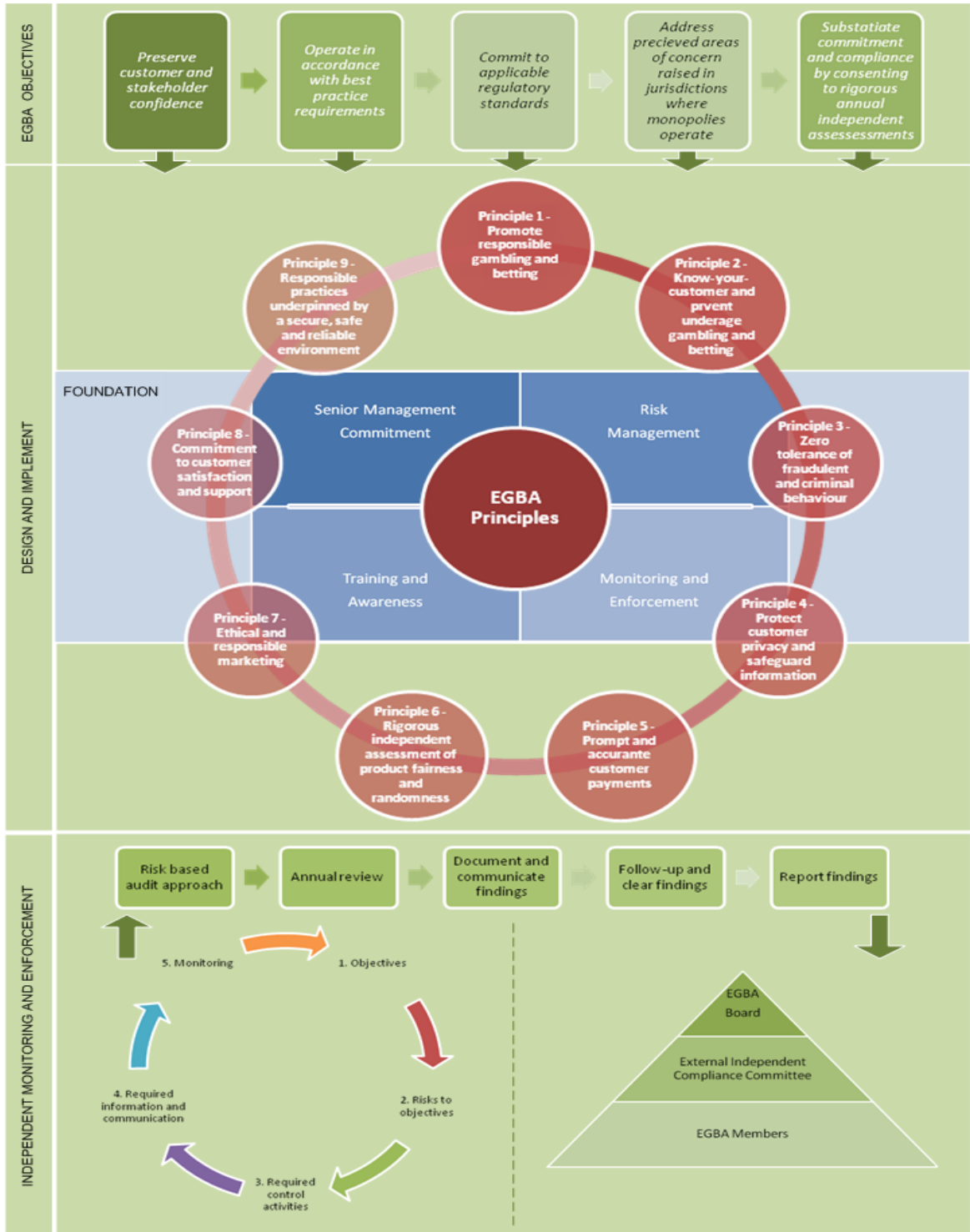
REVISED STANDARDS

Revised Standards are those Standards which have been recently approved by the EGBA Board, and Members are provided with a reasonable grace period in which to implement these Standards. On expiry of the grace period, these Standards will be included in the next annual audit of compliance.

EGBA FRAMEWORK

THE FRAMEWORK IN WHICH EGBA MEMBERS OPERATE

The diagram below sets out the Framework within which the EGBA and its Members operate to design, implement and continuously monitor and enforce compliance with its objectives, and resultant Standards.



EGBA objectives

The EGBA identified a set of objectives to govern and set a mandate for the identification and establishment of the EGBA Principles and resultant Standards. Through thorough analysis of the objectives, the EGBA was able to identify and establish those Principles which would demonstrate that it is each EGBA Member's objective to: i) Ensure that customer and stakeholder confidence in the industry is preserved; ii) Operate in accordance with best practice requirements and regulatory standards; iii) Address the perceived areas of concern raised in jurisdictions where a formal regulatory framework does not exist, or where only monopolies operate; and iv) Substantiate commitment and compliance by consenting to rigorous annual independent assessments.

Design and implementation

The EGBA Framework requires each EGBA Member to implement a foundation that consists of four components that each provide support to the objectives underlying the Standards: *Senior Management Commitment, Risk Management, Training and Awareness, and Monitoring and Enforcement.*

Senior Management Commitment: An important facet to ensure continuous compliance with the EGBA Standards, is to ensure that a senior management representative is appointed by each EGBA Member to take ultimate responsibility for ensuring adequate financial and political support for the implementation of the required practices within the relevant organisation(s).

Risk Management: Risks to industry stakeholders and EGBA Member operations are constantly changing, being influenced by internal and external conditions. Each EGBA Member's risk profile may differ depending on its operating environment. It is necessary that risks are managed according to each EGBA Member's risk profile and that the effectiveness of controls to manage such risks are revisited on a regular basis.

Training and Awareness: The level of compliance with the EGBA Standards is largely dependent on the competence and expertise levels of the employees within each EGBA Member. For this reason, internal and external training and awareness programmes, targeted at key risk areas, are required to be conducted regularly to ensure that appropriate practices are communicated to employees.

Monitoring and Enforcement: Compliance with the EGBA Standards is mandatory and will be monitored and enforced on a regular basis. Apart from independent monitoring and enforcement, EGBA Members are responsible for employing periodic self-audits to monitor compliance with the EGBA Standards.

Independent monitoring and enforcement

A crucial component of the EGBA Framework is to ensure that the EGBA Member operates within the confines of the framework, and in compliance with the Standards which is annually and independently verified, and reported on. For this reason, an independent organisation, eCOGRA¹, has been appointed with the objective of performing risk-based audits of EGBA Members against the Standards.

The formal process is based on audit work programs to ensure the work is consistently performed and documented. Findings are reported to senior management, and 100% compliance is required in all areas. Further governance and independence to the process is achieved by annually reporting the results to eCOGRA's Independent Compliance Committee before final submission of reports to the EGBA Board.

By operating in accordance with this framework and the Principles, the EGBA Members are able to demonstrate that the interests of its customers, industry stakeholders and regulators are protected.

¹ eCOGRA is an independent standards authority for the online gambling industry, and provides an international framework of best operational and player practice requirements enforced through continuous monitoring. For more information visit www.ecogra.org.

PROMOTE RESPONSIBLE GAMBLING AND BETTING

PRINCIPLE The EGBA Members are committed to promoting socially responsible gambling and betting, and working with customers, employees and relevant industry stakeholders to help manage and control problem gambling. EGBA Members will ensure that proper controls are established, implemented, and enforced, and that gambling and betting takes place in a responsible gaming and betting environment.

PLAYER PROTECTION INFORMATION

STANDARDS	<p>1.1 The homepage of Member websites shall contain a clear link to the responsible gambling and betting page, which shall contain the following:</p> <p>1.1.1 A warning that gambling and/or betting could be harmful if not controlled and kept in moderation.</p> <p>1.1.2 Advice on responsible gambling and betting, and a link to sources of help, including helpline numbers.</p> <p>1.1.3 An accepted and simple self-assessment process to determine risk potential.</p> <p>1.1.4 A list of customer protection measures that are available on the site and details of how to access to these measures.</p> <p>1.1.5 Links to problem gambling and betting information and qualified advisory services where available in those territories where the Member actively markets its products.</p> <p>1.1.6 A brief statement of the Member’s commitment to responsible gambling.</p> <p>1.2 The homepage of Member websites shall contain a clear link to the website of at least one organisation qualified to assist problem gamblers.</p> <p>1.3 Gaming and betting software shall contain a clear reminder to the customer about responsible gambling and betting, and a link to the responsible gambling and betting page.</p> <p>1.4 Promotional material shall not be displayed on the Member’s responsible gambling and betting page.</p> <p>1.5 Messages of a Member’s support for the provision of problem gambling treatment, research or educational initiatives should not be misleading.</p> <p>1.6 Direct communication with the customer shall carry a responsible gambling and betting message, where practical.</p> <p>1.7 Free play games websites shall provide links to the same age restriction, responsible gambling and betting, and player protection information as the real money sites.</p>	<p><i>PRODUCTS</i></p> <p><i>All</i></p> <p><i>All</i></p> <p><i>All, except Sports book</i></p> <p><i>All</i></p> <p><i>All</i></p> <p><i>All</i></p> <p><i>All</i></p>
------------------	---	--

SETTING LIMITS

STANDARDS	<p>1.8 In an attempt to mitigate problem gambling, customers shall be able to request the setting of betting/deposit limits.</p> <p>1.9 There should be a clear link from the deposit page to the facility to set deposit limits and/or to the Responsible Gambling page.</p> <p>1.10 Customers shall be able to request the setting of their own deposit limits per day, week and month.</p> <p>1.11 Members shall have systems in place to deal with deposit limit requests in</p>	<p><i>PRODUCTS</i></p> <p><i>All</i></p> <p><i>All</i></p> <p><i>All</i></p> <p><i>All</i></p>
------------------	--	--

SETTING LIMITS

- timely manner.
- 1.12 If a customer wants to increase a deposit limit previously set, a minimum waiting period of 24 hours shall apply. All
- 1.13 A request to decrease a deposit limit shall be implemented immediately. All

SELF EXCLUSION OPTIONS

- STANDARDS
- 1.14 Members' procedures for self-exclusion and temporary cooling-off shall be clearly communicated on the website. Procedures shall clearly state the conditions of self-exclusion. PRODUCTS All
- 1.15 Customers shall be given the opportunity to self-exclude or cool-off by contacting customer services or requesting self-exclusion, or cooling off via the Member's website. All
- 1.16 Once the customer has selected the self-exclusion option, the account shall be locked and any funds in the account paid out, subject to appropriate and necessary checks and verifications. All
- 1.17 Members shall offer customers the ability to self-exclude from gambling and betting activity and best endeavours shall be made to prevent marketing to these customers. All
- 1.18 A third party making an application for a customer's exclusion shall be properly identified. Based on the circumstances and merit, the appropriate manager may give due consideration to the course of action. All
- 1.19 Members shall offer customers a "cooling-off" exclusion period from gambling and betting activity, and best endeavours shall be made to prevent marketing to these customers. All
- 1.20 Training shall be provided to customer service employees to ensure the prompt and efficient handling of correspondence relating to self-exclusion and cooling off. All

PLAYING WITH CREDIT

- STANDARDS
- 1.21 Members shall not provide credit to customers - specifically, Members may not permit a customer to wager, win and receive a payout where the funding of that wager is obtained from the Member other than through existing client funds or the provision of a promotion or bonus. PRODUCTS All

REALITY CHECKS

- STANDARDS
- 1.22 A clearly visible clock shall be available for use by the customer at all times. PRODUCTS All, except Sports book
- 1.23 The denomination of each credit shall be clearly displayed on the games screen and the currency unit should be clearly stated where multiple currency game play is available. All
- 1.24 Customers shall be provided with remote access to their account history dating back for a minimum period of 60 days, and offline access dating back for a minimum period of 6 months, including all deposits, withdrawals, wagers, wins, losses, fees and bonuses. All

SOCIALLY RESPONSIBLE BEHAVIOUR

SOCIALLY RESPONSIBLE BEHAVIOUR

<i>STANDARDS</i>		<i>PRODUCTS</i>	
1.25	Training shall be provided to appropriate employees on the issues of problem gambling and betting, and refresher courses shall be undertaken as and when needed.		<i>All</i>
1.26	Members shall contribute towards the EGBA’s research efforts into the prevention and treatment of problem gambling and betting.		<i>All</i>
1.27	The EGBA and its Members shall annually participate or hold a responsible gaming and betting conference to educate and allow exchange of ideas.		<i>All</i>
1.28	A designated senior management staff member shall be appointed by each Member to assume responsibility for the implementation and monitoring of responsible gambling and betting practices.		<i>All</i>
1.29	Relevant third party and business partner contractual terms and conditions shall provide the Member the right to terminate the contract where that third party’s conduct conflicts with the Member’s responsible gaming and betting program.		<i>All</i>
1.30	Foreign language websites shall provide all information concerning age limits, responsible gambling and betting, and player protection in the relevant foreign language.		<i>All</i>

KNOW-YOUR-CUSTOMER AND PREVENT UNDERAGE GAMBLING AND BETTING

PRINCIPLE

The EGBA Members will seek to implement all reasonable measures that prevent underage individuals from accessing gambling and betting products. EGBA Members will ensure these measures address appropriate age verification and know-your-customer controls, and with help from industry stakeholders and governments, continuously improve the coverage, quality and effectiveness of real-time verification.

UNDERAGE INFORMATION

STANDARDS

2.1	The homepage of the Member’s websites shall prominently display a ‘no under 18’s’ or ‘no under 21’s’ sign (as appropriate for the jurisdiction concerned), which links through to a clear message about underage play.	<i>PRODUCTS</i>	<i>All</i>
2.2	The Member’s website terms and conditions shall state that no player below the legal age of gambling is permitted to participate in remote gaming and betting activities.		<i>All</i>
2.3	Best endeavours by the EGBA Members shall be made to prevent advertising in media that is targeted towards underage individuals, and shall not portray anyone underage in any gaming or betting adverts or promotional material.		<i>All</i>
2.4	The registration process shall include a clear message regarding underage play.		<i>All</i>
2.5	The Member’s responsible gambling and betting page shall provide a link to a recognised filtering programme to enable customers/parents to prevent minors from accessing gambling and betting sites.		<i>All</i>
2.6	Members shall have a clear documented policy which is applicable in the event that an underage individual is identified.		<i>All</i>
2.7	If registration is required prior to potential customers being allowed to “Play for Free”, the Member’s registration process shall include confirmation of age. .		<i>All</i>
2.8	Free play sites should not award cash or cash equivalents unless the customers have been successfully age verified.		<i>All</i>

AGE AND IDENTITY VERIFICATION

STANDARDS

2.9	The EGBA and its Members shall consider any credible third party age verification service providers and, to the extent available, will seek to use third party age verification services on par with state monopolies, where feasible and available.	<i>PRODUCTS</i>	<i>All</i>
2.10	The EGBA and its Members shall work with "leading" verification service providers to improve coverage and quality of verification services available.		<i>All</i>
2.10	The EGBA shall encourage governments to provide access to a wider range of databases to improve verification capabilities.		<i>All</i>
2.11	Age and customer verification shall be conducted in accordance with a formal documented process, and shall include Member and third party verification checks, where feasible and available.		<i>All</i>

SOCIALLY RESPONSIBLE MEMBERS

SOCIALLY RESPONSIBLE MEMBERS

<i>STANDARDS</i>		<i>PRODUCTS</i>	
2.12	Underage gambling and betting shall be regularly monitored by conducting frequent checks of users to ensure compliance with age restrictions.		<i>All</i>
2.13	EGBA Members shall immediately close the account of any underage or suspected underage person found to have accessed its services.		<i>All</i>
2.14	The Member should have in place an appropriate system for refunding the value of all deposits should a person, subsequent to registration, be identified as an underage individual.		<i>All</i>
2.15	Training shall be provided to all employees involved in the Member’s age verification process, including training on the process to follow in the event that instances of a need for additional verification are identified.		<i>All</i>

ZERO TOLERANCE OF FRAUDULENT AND CRIMINAL BEHAVIOUR

PRINCIPLE The EGBA Members will not tolerate fraud or criminal behaviour, and strict security measures and gaming supervision will be implemented and enforced to prevent fraudulent activity and any transactions suspected of being potentially connected to money laundering or other criminal activity.

RESPONSIBILITY AND OWNERSHIP FOR ANTI-MONEY LAUNDERING

<i>STANDARDS</i>	<p>3.1 EGBA Members shall implement an anti-money laundering and combating financing of terrorism policy approved and supported by its senior management which will provide reasonable security measures to prevent transactions which are potentially connected to money laundering and the financing of terrorism.</p> <p>3.2 EGBA Members shall appoint a person or persons with responsibility for implementing and ensuring effectiveness of anti-money laundering and combating financing of terrorism systems.</p> <p>3.3 Anti-money laundering and combating financing of terrorism policies and procedures shall cater for the identification, escalation and reporting of unusual or suspicious activities, including investigating material or unusual deposits, withdrawals and customer accounts where little or no gaming or betting activity takes place.</p> <p>3.4 The fraud and anti-money laundering practices implemented by EGBA Members shall make provision for appropriate know your customer verification and/or customer due diligence processes.</p> <p>3.5 Training and guidance shall be provided to employees on the Member’s policy to ensure the prompt identification, escalation and reporting of fraud and anti-money laundering and combating financing of terrorism practices.</p> <p>3.6 Money laundering and combating financing of terrorism control requirements between Members and service providers shall be clearly defined.</p>	<i>PRODUCTS</i>	<i>All</i>
------------------	---	-----------------	------------

DETECTING CRIMINAL BEHAVIOUR

<i>STANDARDS</i>	<p>3.7 No deposits or payouts shall be made to a customer's account if there is reason to suspect money laundering or terrorist activity unless authorised by the Anti-Money Laundering Reporting Officer. Where the deposit or payout exceeds €2,000 (whether in a single transaction or a series of transactions which appear to be linked), no payment may be made until the customer has been positively identified.</p> <p>3.8 All information regarding changes to customer details shall be logged and appropriate verification documentation shall be requested for significant changes (e.g. changes to customers’ names and banking details).</p>	<i>PRODUCTS</i>	<i>All</i>
------------------	---	-----------------	------------

DETECTING CRIMINAL BEHAVIOUR

- | | | |
|------|--|------------|
| 3.9 | Funds should be remitted by the Member to the customer only to the same payment mechanism from which the funds originated, except where changes to the payment mechanism are substantiated, and where such funds are withdrawn in a licensed gambling establishment which adheres to the relevant anti-money laundering laws that are applicable in the relevant jurisdiction. | <i>All</i> |
| 3.10 | No physical cash or non-electronic methods of payment shall be used to fund an account. | <i>All</i> |
| 3.11 | Transfers of funds between customer accounts shall be conducted through a formal documented process in compliance with the Member's anti-money laundering and combating financing of terrorism policy. | <i>All</i> |
| 3.12 | The Member's terms and conditions shall declare controls applicable over funds transferred between customers. | <i>All</i> |

REPORTING OF CRIMINAL AND SUSPICIOUS ACTIVITIES

- | | | | | |
|------------------|------|--|-----------------|------------|
| <i>STANDARDS</i> | 3.13 | The EGBA Member's anti-money laundering and combating financing of terrorism practices shall include the provision of suspicious transaction reports to the relevant national financial investigation unit and international institutions. | <i>PRODUCTS</i> | <i>All</i> |
| | 3.14 | A legal disclaimer shall be displayed on the Member's web site stating that any criminal or suspicious activities may be reported. | | <i>All</i> |
| | 3.15 | All employees should be made aware of their personal obligations to detect and report criminal and suspicious behaviour. All employees must be aware of the dangers of 'tipping-off' and the procedures to be followed to ensure it does not happen. | | <i>All</i> |

RETENTION OF RECORDS RELATING TO ANTI-MONEY LAUNDERING

- | | | | | |
|------------------|------|--|-----------------|------------|
| <i>STANDARDS</i> | 3.16 | Customer verification documents shall be retained in accordance with the retention requirements of the Member's jurisdiction. | <i>PRODUCTS</i> | <i>All</i> |
| | 3.17 | Records of customer financial transactions shall be retained in accordance with the retention requirements of the Member's jurisdiction. | | <i>All</i> |

PROTECT CUSTOMER PRIVACY AND SAFEGUARD INFORMATION

PRINCIPLE EGBA Members will ensure that the privacy and confidentiality of all customer information submitted at any point in time is maintained and remains protected from unauthorised or unnecessary disclosure.

CUSTOMER PRIVACY AND CONFIDENTIALITY

<i>STANDARDS</i>		<i>PRODUCTS</i>	
4.1	Confidential customer information submitted at any point in time shall be protected from unauthorised or unnecessary disclosure.		<i>All</i>
4.2	Customer credit card numbers stored on the system shall be secured from unauthorised use.		<i>All</i>
4.3	Members shall display and maintain a privacy policy on their websites.		<i>All</i>
4.4	The Member’s privacy policy shall state the minimum information that is required to be collected, the purpose for information collection, the conditions under which information may be disclosed and the controls in place to prevent the unauthorised or unnecessary disclosure of the information.		<i>All</i>
4.5	Foreign language websites shall display the Member’s privacy policy in the relevant foreign language.		<i>All</i>
4.6	Terms and conditions that require acceptance from customers during registration shall clearly state the Member’s privacy policy. Customer consent of the terms and conditions is required prior to successful registration.		<i>All</i>
4.7	Customers shall be provided access to their confidential information and shall be permitted to request changes to inaccurate information.		<i>All</i>
4.8	The Member shall take all reasonable steps to ensure that any information supplied by customers is kept up to date.		<i>All</i>
4.9	Director, officer and employee contracts shall contain a “confidentiality” clause prohibiting the unauthorised or unnecessary disclosure of customer information.		<i>All</i>

PROMPT AND ACCURATE CUSTOMER PAYMENTS

PRINCIPLE EGBA Members will ensure prompt and accurate processing of winnings and payment requests, subject to appropriate and necessary checks and verification.

CUSTOMER REGISTRATION

STANDARDS		PRODUCTS	
5.1	Customer registration shall require the customer to provide the following minimum information: name, age, address and unique username and password details.	All	
5.2	Registration, deposit and withdrawal procedures and conditions shall be clearly communicated to customers.	All	
5.3	The Member's website terms and conditions shall state that only customers legally permitted by their jurisdiction can participate in gambling and betting activities.	All	
5.4	Members shall keep a secure list of all registered customers.	All	
5.5	Customers shall only be permitted to open one account.	All	

PROCESSES AND INFORMATION REQUIRED FOR PAYMENTS TO CUSTOMERS

STANDARDS		PRODUCTS	
5.6	EGBA Members shall ensure prompt and accurate processing of payments subject to appropriate and necessary checks and verifications.	All	
5.7	Payments to and from customers shall be conducted according to a formal documented process.	All	
5.8	Payments to customers shall be conducted within 7 days of receipt of the request and verification.	All	
5.9	The detection and correction of timeout receipts shall be conducted in accordance with a formal documented process.	All	
5.10	All information regarding receipts and payments shall be logged and retained by the applicable parties in accordance with the retention requirements of the Member's licensing jurisdiction.	All	
5.11	Financial reconciliations performed for payments and receipts shall be reviewed and approved.	All	
5.12	Customer account related queries shall be promptly addressed.	All	

LOCKING OF CUSTOMER ACCOUNTS

STANDARDS		PRODUCTS	
5.13	The locking of customer accounts shall be conducted through a formal documented process.	All	
5.14	Any uncontested funds left in an account, previously de-activated by the Member, shall be remitted to the owner of the funds, upon request and subject to published terms and conditions.	All	

SAFEGUARDING CUSTOMER FUNDS

STANDARDS		PRODUCTS	
5.15	The Member's liability for customer balances, pending cash-ins and guaranteed	All	

SAFEGUARDING CUSTOMER FUNDS

prizes should be separately identifiable at any point in time, and Members should demonstrate sufficient cash and cash equivalents to pay these balances.

INACTIVE CUSTOMER ACCOUNTS

<i>STANDARDS</i>	<p>5.16 If the Member adopts a policy of clearing inactive customer accounts, then customers shall be informed prior to clearing of the account, and this policy shall be clearly stated in the Member’s terms and conditions.</p> <p>5.17 Records shall be maintained for all customer accounts that have been cleared, and any customer requesting a cashout from an account that has been cleared shall be settled according to the Member’s terms and conditions.</p>	<i>PRODUCTS</i>	<i>All</i>
			<i>All</i>

EGBA STANDARDS

PRINCIPLE 6 – RIGOROUS INDEPENDENT ASSESSMENT OF PRODUCT FAIRNESS AND RANDOMNESS

RIGOROUS INDEPENDENT ASSESSMENT OF PRODUCT FAIRNESS AND RANDOMNESS

PRINCIPLE The EGBA Members are committed to ensuring that gaming and betting products are subjected to continuous and rigorous independent assessment to ensure products continue to operate in a fair and random manner, and in accordance with published rules.

RESPONSIBILITY AND OWNERSHIP FOR FAIRNESS AND RANDOMNESS OF PRODUCTS

STANDARDS		PRODUCTS
6.1	EGBA Members shall implement a product testing policy, approved and supported by its senior management, which will provide for the testing of all products for fairness and randomness.	All, except Sports book
6.2	The policy shall make provision for the internal and external testing of product fairness and randomness.	All, except Sports book
6.3	Testing of fairness and randomness of products shall be conducted prior to, and subsequent to the operation of the games and/or betting products.	All, except Sports book
6.4	All major changes shall be individually tested and a system-wide regression test shall be completed annually.	All, except Sports book
6.5	Random number generators used in products shall be tested at minimum, annually.	All, except Sports book

PRODUCT RANDOMNESS TESTING

STANDARDS		PRODUCTS
6.6	The results of games must be random, except where clearly disclosed if different game-rules apply.	All, except Sports book
6.7	The output obtained through the use of the random number generator (“RNG”) in games shall be proven to be:	All, except Sports book
	6.7.1 Statistically independent.	
	6.7.2 Uniformly distributed over their range.	
6.8	The RNG shall pass generally accepted statistical tests for randomness (uniformity and independence).	All, except Sports book
6.9	The method used for seed-set generation shall be described (without disclosing intellectual property rights) in adequate detail to enable an assessment of the methodology applied.	All, except Sports book
6.10	Re-seeding shall not be performed in a manner that results in a predictable output.	All, except Sports book
6.11	Wagering activity for slot games shall be distributed amongst an acceptable population of customers.	Casino
6.12	Significant wins for slot games shall be verified and distributed among an acceptable population of customers.	Casino
6.13	Where a game simulates a physical device:	All, except Sports book
	6.13.1 The visual representation of the device must correspond to the features of the physical device.	
	6.13.2 The probability of any event occurring shall be as for the actual physical device except where deviations are clearly displayed to the customers.	

PRODUCT RANDOMNESS TESTING

6.14	Where the game simulates multiple physical devices that would be expected to be independent of one another, each simulated device shall be independent of the other simulated device.	<i>PRODUCTS</i>	<i>All, except Sports book</i>
6.15	Where the game simulates physical devices that have no memory of previous events, the behaviour of the simulations shall be independent of the behaviour of previous simulations.		<i>All, except Sports book</i>

PAYOUT PERCENTAGE TESTING

<i>STANDARDS</i>	6.16	Payout percentage reviews shall be conducted on a monthly basis to verify the actual return to the customer against the theoretical/estimated return.	<i>PRODUCTS</i>	<i>Casino</i>
	6.17	The financial data log files should be reconciled to movements on the accounts to ensure accuracy and completeness of data used in final result output-based payout percentage and RNG testing.		<i>Casino</i>
	6.18	The theoretical statistical return percentage for a particular game type shall be no less than that of the equivalent game in free play mode.		<i>Casino</i>

GAME RULES

<i>STANDARDS</i>	6.19	Game rules should be date stamped and made available to the customer at all times.	<i>PRODUCTS</i>	<i>All</i>
	6.20	The game pay tables should be available to the customer during games of chance.		<i>Casino, Bingo</i>
	6.21	Foreign language websites shall aim to provide assistance and guidance to all customers on foreign language related queries, where possible.		<i>All</i>
	6.22	The design and operation of games shall be strictly in accordance with the specified game rules, and shall not deviate from those rules.		<i>All</i>
	6.23	Changes to rules and pay tables shall not be retrospective in their effect.		<i>All</i>
	6.24	"Near-miss" game results shall not be falsely displayed by substituting one losing outcome with a different losing outcome.		<i>Casino</i>
	6.25	"Play for free" offerings shall not mislead customers. A Member offering both "play for free" and "play for gain" games shall ensure that the "play for free" reflects the odds, rules and behaviour of the "play for gain".		<i>All</i>

ANTI-COLLUSION AND ANTI-DECEPTION MEASURES

<i>STANDARDS</i>	6.26	Preventative and detective controls or technology shall be in place to ensure that the prospect of cheating through collusion (external exchange of information between different customers) is prevented.	<i>PRODUCTS</i>	<i>Poker</i>
	6.27	Poker rooms shall not utilise software (for example poker robots that play poker online with no or minimal human intervention) or other means to simulate increased customer activity or provide misleading information about a site's popularity.		<i>Poker</i>
	6.28	Poker rooms shall not permit the use of robots or other devices by customers with a view to providing them with an advantage over other customers, and shall be vigilant in monitoring and stopping the use of these robots and devices.		<i>Poker</i>
	6.29	Effective risk control mechanisms should be in place for managing events offered, bet sizes and prices, taking into consideration available cash and cash equivalents.		<i>Sportsbook</i>
	6.30	For sportsbetting there should be procedures for identifying suspicious betting transactions and patterns which might pose a threat to the sport's integrity or		<i>Sportsbook</i>

ANTI-COLUSSION AND ANTI-DECEPTION MEASURES

an offence of cheating. Where a threat is identified there should be a procedure for notifying the relevant sporting body or Regulatory Authority in line with applicable data protection requirements.

ETHICAL AND RESPONSIBLE MARKETING

PRINCIPLE EGBA Members will endeavour to employ well balanced advertising and marketing campaigns in line with responsible gaming and conduct Principles.

RESPONSIBLE MEMBER ADVERTISING AND MARKETING

<i>STANDARDS</i>		<i>PRODUCTS</i>	
7.1	Advertisements shall contain factually correct information and shall not be false or misleading, particularly with regard to customer winnings.		<i>All</i>
7.2	Advertisements shall not entice the underage to gamble or bet, and shall not be displayed in media that is clearly targeted at the underage.		<i>All</i>
7.3	Customers should not be encouraged to chase their losses or re-invest their winnings and at no time should it be suggested that gambling is a means of solving financial difficulties.		<i>All</i>
7.4	Advertisements and promotional content shall be within the spirit of responsible gambling.		<i>All</i>
7.5	Advertisements shall not contain a misrepresentation that is likely to cause damage to the business or goodwill of another person.		<i>All</i>
7.6	A Member shall not knowingly engage in the distribution of unsolicited advertisement (i.e. SPAM) either directly or through a third party.		<i>All</i>
7.7	Email, SMS and bonus advertisements shall have an unsubscribe, or opt out, facility.		<i>All</i>
7.8	The Member should not abuse its relationship with the customer by any unauthorised activity on the customer's computer system.		<i>All</i>
7.9	Terms and conditions applicable to promotional activities shall be clearly displayed and shall not be unreasonably altered subsequent to the wagering activity.		<i>All</i>
7.10	Promotional terms and conditions shall include the last date and time published.		<i>All</i>

RESPONSIBLE THIRD PARTY ADVERTISING AND MARKETING

<i>STANDARDS</i>		<i>PRODUCTS</i>	
7.11	Members shall ensure that an affiliate and/or third party performing advertisements on their behalf is aware of and takes appropriate steps to abide by the EGBA Standards.		<i>All</i>
7.12	If the Member becomes aware of an affiliate and/or third party behaving in a manner that contravenes these EGBA Standards, the Member shall take reasonable steps to ensure that the affiliate ceases that behaviour or that the affiliate and/or third party contract is terminated.		<i>All</i>
7.13	Direct advertisements and promotional communication with the customer shall carry a no under 18's or no under 21's warning where practical.		<i>All</i>

COMMITMENT TO CUSTOMER SATISFACTION AND SUPPORT

PRINCIPLE The EGBA Members are committed to providing customers with an enjoyable gaming experience with access to 24/7 support, where they can be assured of timely resolution of disputes.

CUSTOMER SUPPORT AND DISPUTE RESOLUTION

<i>STANDARDS</i>	8.1	Contact information for complaints and dispute resolution shall be readily accessible on the EGBA Member websites.	<i>PRODUCTS</i>	<i>All</i>
	8.2	Customers shall be able to log complaints and disputes on a 24/7 basis.		<i>All</i>
	8.3	Foreign language websites shall aim to provide assistance and guidance to all customers on foreign language related complaints and disputes, where possible		<i>All</i>
	8.4	The resolution and escalation of customer complaints shall be conducted in accordance with a formal documented process.		<i>All</i>
	8.5	Members shall keep records of all customer correspondence relating to a complaint and dispute.		<i>All</i>

THIRD PARTY DISPUTE RESOLUTION

<i>STANDARDS</i>	8.6	An independent third party shall be available for mediation or resolution of disputes received from Members or their customers.	<i>PRODUCTS</i>	<i>All</i>
	8.7	The third party shall be required to keep record of all customer correspondence relating to a dispute.		<i>All</i>

RESPONSIBLE PRACTICES UNDERPINNED BY A SECURE, SAFE AND RELIABLE ENVIRONMENT

PRINCIPLE EGBA Members will operate gaming and betting products within an internal control environment that is in line with best practice and which supports the objectives of a secure, safe and reliable environment.

GOVERNANCE AND ACCOUNTABILITY STRUCTURE

STANDARDS	9.1	EGBA Members shall appoint a Compliance Officer, who will assume ultimate responsibility for compliance with the controls specified within the EGBA Standards.	<i>PRODUCTS</i>	<i>All</i>
	9.2	The appointed Compliance Officer shall have the required authority within the Member organisation to ensure processes, policies and procedures required for compliance are established, implemented and maintained.		<i>All</i>
	9.3	The appointed Compliance Officer shall ensure that training and awareness programmes, specified within the EGBA Standards, are conducted on an annual basis or more frequently if required within the Member organisation.		<i>All</i>

INDEPENDENT MONITORING AND REPORTING STRUCTURE

STANDARDS	9.4	EGBA Members shall commit to an annual review of their operations by an independent third party to assess compliance with the EGBA Standards.	<i>PRODUCTS</i>	<i>All</i>
	9.5	The appointed Compliance Officer shall have the responsibility and authority to annually report compliance with the EGBA Standards to senior management.		<i>All</i>
	9.6	The independent third party shall be required to annually report Member compliance to the EGBA Board.		<i>All</i>

FINANCIAL AND RECORD KEEPING ENVIRONMENT

STANDARDS	9.7	EGBA Members shall commit to an annual audit of financial statements and accounts performed by a reputable external Audit Firm.	<i>PRODUCTS</i>	<i>All</i>
	9.8	EGBA Members shall keep records in a manner that will allow the timely preparation and audit of financial statements and accounts.		<i>All</i>
	9.9	EGBA Members shall keep financial transaction records in accordance with the retention requirements of the relevant jurisdiction.		<i>All</i>

LEGAL AND REGULATORY ENVIRONMENT

STANDARDS	9.10	EGBA Member websites shall display the name of the Member and the address of its registered office.	<i>PRODUCTS</i>	<i>All</i>
	9.11	EGBA Members shall have a legal operating license from a reputable European regulatory authority.		<i>All</i>
	9.12	EGBA Member websites shall prominently display the licensing jurisdiction from which gambling and betting activities are conducted.		<i>All</i>
	9.13	EGBA Members shall appoint a Compliance Officer, who will assume ultimate responsibility for compliance with the licensing jurisdiction’s requirements, as		<i>All</i>

LEGAL AND REGULATORY ENVIRONMENT

- necessary.
- 9.14 EGBA Member websites shall prominently display date stamped contractual terms and conditions applicable to gambling activities, which should be available to print or download at any time. *All*

INFORMATION SECURITY ENVIRONMENT

- | | |
|------------------|---|
| <i>STANDARDS</i> | <p>9.15 Security policies and procedures shall be documented and communicated to relevant employees, and reviewed at least annually or in the event of material changes. <i>PRODUCTS All</i></p> <p>9.16 Security policies and procedures shall be implemented and monitored. Risk-based internal and external security reviews shall be conducted at least annually or in the event of material changes. <i>All</i></p> <p>9.17 Physical security perimeters should be in place to restrict access to authorised personnel to areas that contain information and information processing facilities and to reduce the risk of environmental threats and hazards to equipment. <i>All</i></p> <p>9.18 Relevant third party and business partner contractual terms and conditions should cover all appropriate security requirements. <i>All</i></p> <p>9.19 Virus scanners and/or detection programs shall be installed on all pertinent information systems. These programs shall be updated regularly to scan for new strains of viruses. <i>All</i></p> <p>9.20 Controls shall be in place for changes to information processing facilities and systems in order to reduce the risk of security or system failures. <i>All</i></p> <p>9.21 All customers shall be verified through the use of an account identifier/password pair, or by any other means that provide equal or greater security (e.g. digital certificates), prior to being permitted to participate in gambling and betting activities. <i>All</i></p> <p>9.22 All customer deposit, withdrawal or adjustment transactions shall be subject to strict security control and shall be maintained in a system audit log. <i>All</i></p> <p>9.23 All system users shall have their identity verified with an account identifier / password pair, or by any other means that provide equal or greater security, prior to being permitted to access the system. All system user actions should be logged. <i>All</i></p> <p>9.24 Information involved in online transactions should be protected to prevent incomplete transmission, mis-routing, unauthorised message alteration, unauthorised disclosure, unauthorised message duplication or replay. <i>All</i></p> <p>9.25 A policy on the use of cryptographic controls for protection of information should be developed and implemented. <i>All</i></p> |
|------------------|---|

BUSINESS CONTINUITY AND DISASTER RECOVERY

- | | |
|------------------|---|
| <i>STANDARDS</i> | <p>9.26 Backup and recovery procedures shall be in place to ensure data and information (e.g. logs and financial information) are backed up on a regular basis and can be restored in the event of a disaster. <i>PRODUCTS All</i></p> <p>9.27 Critical data and information shall be backed-up and secured off-site on a daily basis. <i>All</i></p> <p>9.28 Backup and disaster recovery responsibilities and procedures between software providers and Members shall be clearly defined. <i>All</i></p> <p>9.29 All information required for completing an incomplete game shall be recoverable by the system. <i>All</i></p> <p>9.30 The system shall enable customers to complete interrupted games, within a <i>All</i></p> |
|------------------|---|

BUSINESS CONTINUITY AND DISASTER RECOVERY

- reasonable timeframe, whether from loss of communication with the end-player device or an event on the system.
- 9.31 All transactions involving customer funds shall be recoverable by the system in the event of a failure or malfunction. *All*
 - 9.32 If a Member has reason to believe or to suspect that an interruption has been caused, or a transaction affected by illegal activity, the Member may withhold payment pending further investigation. *All*

SOFTWARE DEVELOPMENT AND MAINTENANCE

- | | |
|------------------|---|
| <i>STANDARDS</i> | <ul style="list-style-type: none"> 9.33 A development methodology for software and applications shall be defined, documented and implemented. <i>PRODUCTS All</i> 9.34 All documentation relating to software and application development shall be available and retained for the duration of its lifecycle. <i>All</i> 9.35 Change control procedures shall be implemented in line with the change management policy and shall cater for the following: <i>All</i> <ul style="list-style-type: none"> 9.35.1 Approval procedures for changes to software. 9.35.2 A policy addressing emergency change procedures. 9.35.3 Procedures for testing and migration of changes. 9.35.4 Segregation of duties between the developers, quality assurance team, the migration team and users. 9.35.5 Procedures to ensure that technical and user documentation is updated as a result of a change. 9.35.6 Procedures to ensure that security control requirements are specified for new information systems, or enhancements to existing information systems. 9.36 The development and test environment must be isolated physically and logically from the live operational systems. <i>All</i> |
|------------------|---|

ADDENDUM A

REVISED STANDARDS

The following Standards have been recently approved by the EGBA Board, and are new or revised Standards to those approved in March 2009.

STANDARDS		PRODUCTS	All
1.1	The homepage of Member websites shall contain a clear link to the responsible gambling and betting page, which shall contain the following:		
1.1.1	A warning that gambling and/or betting could be harmful if not controlled and kept in moderation.		
1.1.2	Advice on responsible gambling and betting, and a link to sources of help, including helpline numbers.		
1.1.3	An accepted and simple self-assessment process to determine risk potential.		
1.1.4	A list of customer protection measures that are available on the site and details of how to access to these measures.		
1.1.5	Links to problem gambling and betting information and qualified advisory services where available in those territories where the Member actively markets its products.		
1.1.6	A brief statement of the Member's commitment to responsible gambling.		
1.5	Messages of a Member's support for the provision of problem gambling treatment, research or educational initiatives should not be misleading.		All
1.9	There should be a clear link from the deposit page to the facility to set deposit limits and/or to the Responsible Gambling page.		All
1.16	Once the customer has selected the self-exclusion option, the account shall be locked and any funds in the account paid out, subject to appropriate and necessary checks and verifications.		All
1.23	The denomination of each credit shall be clearly displayed on the games screen and the currency unit should be clearly stated where multiple currency game play is available.		All
1.24	Customers shall be provided with remote access to their account history dating back for a minimum period of 60 days, and offline access dating back for a minimum period of 6 months, including all deposits, withdrawals, wagers, wins, losses, fees and bonuses.		All
2.8	Free play sites should not award cash or cash equivalents unless the customers have been successfully age verified.		All
2.15	The Member should have in place an appropriate system for refunding the value of all deposits should a person, subsequent to registration, be identified as an underage individual.		All
3.1	EGBA Members shall implement an anti-money laundering and combating financing of terrorism policy approved and supported by its senior management which will provide reasonable security measures to prevent transactions which are potentially connected to money laundering and the financing of terrorism.		All
3.2	EGBA Members shall appoint a person or persons with responsibility for implementing and ensuring effectiveness of anti-money laundering and combating financing of terrorism systems.		All
3.3	Anti-money laundering and combating financing of terrorism policies and procedures shall cater for the identification, escalation and reporting of unusual		All

- or suspicious activities, including investigating material or unusual deposits, withdrawals and customer accounts where little or no gaming or betting activity takes place.
- 3.5 Training and guidance shall be provided to employees on the Member’s policy to ensure the prompt identification, escalation and reporting of fraud and anti-money laundering and combating financing of terrorism practices. *All*
- 3.6 Money laundering and combating financing of terrorism control requirements between Members and service providers shall be clearly defined. *All*
- 3.7 No deposits or payouts shall be made to a customer's account if there is reason to suspect money laundering or terrorist activity unless authorised by the Anti-Money Laundering Reporting Officer. Where the deposit or payout exceeds €2,000 (whether in a single transaction or a series of transactions which appear to be linked), no payment may be made until the customer has been positively identified. *All*
- 3.9 Funds should be remitted by the Member to the customer only to the same payment mechanism from which the funds originated, except where changes to the payment mechanism are substantiated, and where such funds are withdrawn in a licensed gambling establishment which adheres to the relevant anti-money laundering laws that are applicable in the relevant jurisdiction. *All*
- 3.11 Transfers of funds between customer accounts shall be conducted through a formal documented process in compliance with the Member’s anti-money laundering and combating financing of terrorism policy. *All*
- 3.13 The EGBA Member’s anti-money laundering and combating financing of terrorism practices shall include the provision of suspicious transaction reports to the relevant national financial investigation unit and international institutions. *All*
- 3.15 All employees should be made aware of their personal obligations to detect and report criminal and suspicious behaviour. All employees must be aware of the dangers of ‘tipping-off’ and the procedures to be followed to ensure it does not happen. *All*
- 3.17 Records of customer financial transactions shall be retained in accordance with the retention requirements of the Member’s jurisdiction. *All*
- 5.10 All information regarding receipts and payments shall be logged and retained by the applicable parties in accordance with the retention requirements of the Member’s licensing jurisdiction. *All*
- 5.15 The Member’s liability for customer balances, pending cash-ins and guaranteed prizes should be separately identifiable at any point in time, and Members should demonstrate sufficient cash and cash equivalents to pay these balances. *All*
- 5.16 If the Member adopts a policy of clearing inactive customer accounts, then customers shall be informed prior to clearing of the account, and this policy shall be clearly stated in the Member’s terms and conditions. *All*
- 6.17 The financial data log files should be reconciled to movements on the accounts to ensure accuracy and completeness of data used in final result output-based payout percentage and RNG testing. *Casino*
- 6.19 Game rules should be date stamped and made available to the customer at all times. *All*
- 6.20 The game pay tables should be available to the customer during games of chance. *Casino, Bingo*
- 6.29 Effective risk control mechanisms should be in place for managing events offered, bet sizes and prices, taking into consideration available cash and cash equivalents. *Sportsbook*
- 6.30 For sportsbetting there should be procedures for identifying suspicious betting transactions and patterns which might pose a threat to the sport’s integrity or *Sportsbook*

- an offence of cheating. Where a threat is identified there should be a procedure for notifying the relevant sporting body or Regulatory Authority in line with applicable data protection requirements.
- 7.3 Customers should not be encouraged to chase their losses or re-invest their winnings and at no time should it be suggested that gambling is a means of solving financial difficulties. *All*
 - 7.8 The Member should not abuse its relationship with the customer by any unauthorised activity on the customer's computer system. *All*
 - 9.14 EGBA Member websites shall prominently display date stamped contractual terms and conditions applicable to gambling activities, which should be available to print or download at any time. *All*
 - 9.16 Security policies and procedures shall be implemented and monitored. Risk-based internal and external security reviews shall be conducted at least annually or in the event of material changes. *All*
 - 9.17 Physical security perimeters should be in place to restrict access to authorised personnel to areas that contain information and information processing facilities and to reduce the risk of environmental threats and hazards to equipment. *All*
 - 9.18 Relevant third party and business partner contractual terms and conditions should cover all appropriate security requirements. *All*
 - 9.23 All system users shall have their identity verified with an account identifier / password pair, or by any other means that provide equal or greater security, prior to being permitted to access the system. All system user actions should be logged. *All*
 - 9.24 Information involved in online transactions should be protected to prevent incomplete transmission, mis-routing, unauthorised message alteration, unauthorised disclosure, unauthorised message duplication or replay. *All*
 - 9.25 A policy on the use of cryptographic controls for protection of information should be developed and implemented. *All*
 - 9.35 Change control procedures shall be implemented in line with the change management policy and shall cater for the following: *All*
 - 9.35.1 Approval procedures for changes to software.
 - 9.35.2 A policy addressing emergency change procedures.
 - 9.35.3 Procedures for testing and migration of changes.
 - 9.35.4 Segregation of duties between the developers, quality assurance team, the migration team and users.
 - 9.35.5 Procedures to ensure that technical and user documentation is updated as a result of a change.
 - 9.35.6 Procedures to ensure that security control requirements are specified for new information systems, or enhancements to existing information systems.
 - 9.36 The development and test environment must be isolated physically and logically from the live operational systems. *All*