

Home Gaming Entertainment Limited - www.winfest.de - Advertising Guidelines

This document further substantiates some of the obligations set forth in the Terms and Conditions. Affiliates are required to abide in providing their services to the Company. This document is complementary to the Affiliate Terms and Conditions and shall not be construed as exempting Affiliates from any of the obligations laid out in the Terms and Conditions. The rules set forth herein are mandatory and shall be interpreted in accordance with the Inter-State Treaty on Gambling 2021 (GlüStV 2021). Affiliates declare that they have full knowledge of the provision set forth in GlüStV 2021, especially, but not limited to, the references to GlüStV 2021 made herein.

For the purposes of these Advertising Guidelines, Advertising is defined as any statement made in the exercise of a trade, craft or independent profession with the aim of promoting the sale of goods or the provision of services.

In providing their services, Affiliates shall abide to the following rules and principles:

a. The advertising should be kept moderate and limited to what is necessary to achieve the intended objective, such as channeling. Specifically, it is unacceptable if the advertising is false, misleading, or inconsistent, particularly regarding potential winnings, the number of participants, and the general terms of participation. Any advertising that presents the allure of winning in an enticing manner is not allowed.

b. The inherent randomness of the game of chance should be immediately apparent to the average viewer in any advertising.

c. Advertising that creates a sense of time pressure regarding the opportunity to participate in a game of chance is prohibited. This includes timed notifications indicating the remaining time until the participation deadline ends, along with the promotion of additional winnings on the final day of the participation deadline.

d. Advertising for public games of chance that:

- portrays such games as everyday commodities,
- emphasizes the advantages of these games in a biased and exclusive manner,
- implies that refraining from playing such games is negative or implies that participating in these games enhances one's social success,
- encourages the recovery of losses or reinvestment of winnings,
- suggests that participating in such games could be a reasonable strategy for improving one's financial situation,
- implies that these games can address financial, social, or psychosocial problems,
- promotes illegal games of chance simultaneously,

is not permitted.

e. In case of advertising bonus campaigns or discount systems permitted under section 35 that directly or indirectly target the player, such advertising should help to better achieve the channeling objective mentioned in section 1, first sentence, number 2 of GlüStV 2021. However, when advertising discounts

and bonuses, the group of recipients, the occasion and duration of the campaign, and the amount of benefits should be clearly and easily discernible. The provisions of GlüStV 2021 regarding the protection of minors and vulnerable players must be adhered to. The evaluation of advertising with discounts and bonuses will be conducted as part of the general assessment obligation.

f. Infomercials are not permitted.

g. The generation of calls by players or potential players to the operator using free competitions for the purpose of advertising fee-based gaming offers is only allowed if the competition documents explicitly indicate that information regarding additional fee-based gaming opportunities will also be provided during the call.

h. Advertising for online casino games, online poker, and virtual slot games offered free of charge as defined in section 6j (1) 1 of GlüStV 2021 is not allowed.

i. Advertising for public games of chance in the context of teleshopping or teleshopping for public games of chance is not permitted.

j. Advertising in print publications, programs, or broadcasts that primarily target minors or similarly vulnerable groups, as well as advertising on websites whose content is primarily aimed at minors or similarly vulnerable groups, is prohibited. Advertising may be considered inappropriate if it includes the portrayal of child or adolescent role models or idols, depicts minors directly participating in games, or implies that minors are involved in gaming through links with other depictions in the advertisement. Advertising on social networks must be restricted to users who are of legal age, if such limitations are provided by the respective network operator. Advertising should not include elements characteristic of programs intended for children or adolescents. Advertising that is aired immediately before or after programs for children and adolescents is prohibited.

k. Advertising in public spaces, such as billboards, advertising columns, and on public transport vehicles, is not allowed.

l. With the exception of jersey and perimeter advertising and similar advertising media, the following information requirements apply to advertising:

aa) All advertising must include mandatory information about the addictive risks associated with the advertised games of chance, the prohibition of participation by minors, and the availability of independent counseling and therapy services.

bb) The mandatory information must be clearly and easily visible in the respective communication medium and of a size that allows an average user to fully comprehend the information.

cc) In the case of advertising consisting of multiple connected sequences, it is sufficient to include the mandatory information in a sequence at the end of the advertisement; however, incorporating the mandatory information after a banner advertisement is not permissible. The connection to the advertised product must be maintained.

dd) Information about maximum winnings must also include details about the probability of winning and losing.

m. If the license holder offers other licensed games of chance, only the other licensed forms of games may be advertised on radio/TV and the internet between 6 a.m. and 9 p.m. Advertising exclusively for an umbrella brand is not permitted.

n. Additional requirements apply for advertising on the occasion of events in sports facilities, without prejudice to the regulation in clause m) above:

aa) Virtual representations must adhere to the provisions of section 5 (4) of GlüStV 2021.

bb) umbrella brand advertising on programmable perimeters and similar advertising media, as well as in virtual representations during broadcasts of the sporting event on radio/TV and the internet, is only allowed between 6 a.m. and 9 p.m. daily and must be accompanied by a clear statement that it refers only to gaming offers that are allowed to be advertised.

cc) Advertising for public games of chance on jerseys for children and adolescents is not permitted.

o. In the context of advertising, reference must be made to the inclusion in the joint official list ("White List") as specified in section 9 (8) of GlüStV 2021.

p. Influencer marketing is not allowed.

q. Cooperative promotion with individuals who record and share their own or someone else's gaming activities through radio/TV, social networks, or live broadcasts is not permitted.

r. The use of triggers, particularly in Rich Media Formats (audio, video, animation), is not allowed in internet advertising.

s. Affiliates shall provide and make available these Advertising Guidelines to their employees/partners/collaborators which are directly responsible for the individual advertisements in order to ensure full compliance with these Guidelines.

t. Affiliate's website shall exclusively link to gaming offers from operators who hold the corresponding license according to GlüStV 2021.

u. All advertising content (text, images, sound, moving images) must be clearly identified as advertising. This requirement does not apply to editorial content, such as reviews on comparison portals. Information regarding the affiliate's compensation in the event of registration with the presented gaming providers must be clearly displayed and easily visible to an average user upon accessing the website.

v. Paid publications must be designed in a way that the recipient can easily recognize them as advertising. Advertising must be clearly distinguishable from the editorial section through visible labeling and design. Additionally, the rules of advertising law apply. Editorial publications referring to providers of public games of chance, their products, services, or events must not cross the line into covert advertising.

w. Advertising for virtual slot games and online poker is prohibited at public film events primarily targeting children and adolescents, and is only permitted after 9 p.m. in other cases.

x. The use of the terms "casino" or "casino games" is not allowed in connection with the operation and distribution of virtual slot games or their advertising. However, if an operator holds a license for both virtual slot games and online casino games, the terms "casino" and "casino games" may be used in the context of umbrella brand advertising and advertising for online casino games. Direct use of these terms to designate or advertise virtual slot games or online poker is not permitted.

y. A recording of broadcast radio and internet advertising programs must be kept throughout the contractual period and submitted to the Company upon request. For radio/TV advertising, the broadcasting times, schedules, and, for internet advertising, the third-party websites, affiliates, social networks, newsletters, and respective advertising times must be continuously documented in an electronic spreadsheet and maintained throughout the contractual period. These spreadsheets must be provided to the Company authority upon request.