

# Responsible Marketing Statement

## **Responsible Marketing**

Responsible marketing is an important task in our industry and our products involve risks which we choose to explain and do not conceal. We want to offer our customers a safe and pleasant gaming experience, and this must start with the advertising of our offers, which we currently broker via our LOTTO24 and Tipp24 brands. The percentage of offers that are advertised is 100%.

We have set out our basic guidelines for the protection of players in our ZEAL Code. Internally, there are clear guidelines for our employees regarding possibilities and limits in the field of marketing.

Our marketing activities comply with all laws and national voluntary commitments. The main basis for us is the State Treaty on the New Regulation of Gambling in Germany (GlüStV 2021), the Youth Protection Act (JuSchG), the State Treaty on the Protection of Minors in the Media (JMStV), the State Media Treaty (MStV), and the Unfair Competition Act (UWG).

For us, compliance with these laws includes refraining from advertising on television and in public spaces, limiting the time when online scratch cards are offered, and advertising on the radio and on the Internet between 6:00 a.m. and 9:00 p.m.

In our advertising activities, the following obligations apply to us with regard to placement, design and content:

- Honesty: Our marketing measures and campaigns present the lottery offer and our products to our target groups realistically and without undue exaggerations and not withhold relevant information
- Rejection of positive distortions and exaggerations: We transparently communicate to our customers how high their chances of winning are. This information can be found on all our websites (lotto24.de, tipp24.de, lotto.gmx.de, lotto.web.de).
- Exclusion of underage and vulnerable target groups: We do not market to children under the age of 18, because they cannot always recognize or classify the intent of advertising.
- Placement of references to addiction risks and offers of help for at-risk player personalities: All advertising measures are provided with information on the dangers of addiction and a ban on gambling for minors, as well as references to offers of help.
- Accessible information: Information on the dangers of addiction and offers of help in simple, local language and as barrier-free access to this information as possible.
- Agreement on restrictive advertising guidelines with business partners and suppliers.

## **Monitoring of our Marketing Activities**

All activities are constantly monitored and approved by our Legal and Compliance departments.

We also actively encourage our employees, partners and customers to report actual or suspected violations - anonymously if necessary via our whistleblower portal - of the responsible marketing principles we have set ourselves and of the applicable legal requirements. We treat these reports with the highest possible priority.

In 2022, there were no violations, controversies, proceedings or judgments related to unethical or illegal marketing by us.

## **Transparent Products**

Transparent products are also part of the protection of gamblers and responsible marketing. At the heart of ZEAL's educational work are transparent product descriptions and clearly visible warnings. These product descriptions include the underlying participation requirements, game conditions, game formulas, prize classes, payout odds, win and loss probabilities, addiction risks, as well as the time and type of prize draw. 100% of our products are already described in this way.

The relevant information can be found on our websites (lotto24.de, tipp24.de, lotto.gmx.de, lotto.web.de). In particular, the Help & Service section of our websites provides detailed information on our various products. In addition, we offer our customers the opportunity to contact us personally, for example by e-mail at [service@lotto24.de](mailto:service@lotto24.de) or via our service hotline on 040 299 960 996.

Product transparency also includes clearly visible warnings about possible product hazards. Further information on this can be found in our Responsible Gaming Statement.

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