



Internet And Mobile Association Of India

Voluntary Code of Ethics *for* Online Gaming Intermediaries



PREAMBLE

- a. This voluntary code of ethics for Online Gaming Intermediaries (the “**Code**”) is issued as a Joint Declaration of intent by members of the **Digital Gaming Committee** of the Internet and Mobile Association of India (“**IAMAI**”) [in collaboration with other industry bodies].
 - b. Signatories to this Code commit to act in good faith and ensure that their products and services adhere to the principles prescribed herein.
 - c. By adhering to this Code, the signatories commit to conduct themselves in a responsible and transparent manner and pledge to invest in the safety and well-being of their users.
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OBJECTIVES

- a. To protect the interests of consumers and enable them to make informed choices about the online games they access.
 - b. To create a healthy environment for online games in India and ingrain a culture of responsible gaming in the country.
 - c. To elevate the industry standard and bring uniformity in the business practices of signatories.
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APPLICABILITY

- a. Online Gaming Intermediaries will have a legal entity incorporated in India under the laws applicable in India.
 - b. Adherence to this Code is voluntary and does not override or intend to replace existing laws applicable to Signatories.
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EFFECTIVE DATE

- a. This Code shall apply to each Signatory from the date that such Signatory signs the Code.
 - b. No act or omission of a Signatory, prior to the date of signing of this Code by such Signatory, shall be deemed to be a contravention of this Code.
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CODE OF ETHICS

Signatories to the Code will undertake best efforts to adopt the following practices in the interest of building an open, safe, trusted, and accountable online gaming ecosystem with a clear and steadfast focus on user protection.

1. RESPONSIBLE GAMING

1.1. General Principles:

- Each Signatory shall articulate a commitment towards responsible gaming on its platform.
- Each Signatory shall advise its users to follow responsible gaming practices and take necessary precautions while playing.

1.2. Measures:

- Online Gaming Intermediaries will provide users with access to information about responsible gaming and safety guidelines on their website or app.
- Online Gaming Intermediaries will allow users an option to set time or spend limits for themselves.

- Online Gaming Intermediaries will endeavour to offer a self-exclusion feature, allowing players to willingly suspend their access for a chosen period.
 - Online Gaming Intermediaries will endeavour to undertake education and communication campaigns to raise awareness about engaging with online gaming in a responsible manner.
 - Online Gaming Intermediaries will endeavour to utilize widely available advanced technology tools to monitor player behaviours wherever applicable and endeavour to provide appropriate support features to players demonstrating at-risk behaviour.
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2. SAFEGUARDS FOR MINORS (AGE GATING)

- 2.1.** All necessary safeguards to protect minors will be instituted by Online Gaming Intermediaries.
 - 2.2.** Formats by Online Gaming Intermediaries involving real money prizes or awards shall not be offered to users who are less than 18 years old.
 - 2.3.** Online Gaming Intermediaries will ensure the clear communication of age restrictions by prominently displaying the “18 or 18+ only” signage across all their platforms for formats involving real money prizes or awards.
 - 2.4.** Online Gaming Intermediaries will obtain user acceptance of T&Cs that affirm legal age eligibility, with details to be verified by the OGIs. In case Online Gaming Intermediaries, receive actual knowledge that the account belongs to a minor, they shall immediately terminate the access of such account.
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3. FAIR GAMING

3.1. Policies, game rules & information:

- Online Gaming Intermediaries will draft and publish on their website and platform terms and conditions, privacy policy and other policies related to gaming formats, which shall accurately and clearly specify (without limitation) the mechanics and rules of the Online Games, the terms and conditions of each Online Game, the points calculation mechanism, and the manner of determination of winners, the prizes and distribution of the prizes.
 - The terms of participation offered by Online Gaming Intermediaries shall be fair and transparent, and all users shall be offered the same pre-declared rules, opportunities, and prizes as the other users and, a grievance redressal mechanism for the redressal of their complaints.
 - Online Gaming Intermediaries shall endeavour to adopt the best practices to inform their users about the nature of content in the online game.
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3.2. Fairness and anti-deception measures:

- Online Gaming Intermediaries offering real-money games will not offer any contest or game where the platform, directly or indirectly, through its agency or bots or any other such means, participate against users.
- Online Gaming Intermediaries offering real-money games will endeavour to take measures, including certifications from independent third-party organizations, wherever applicable, to ensure that all games are only played between real persons and not against automated systems such as bots.

- Online Gaming Intermediaries will not allow for usage of computer software that generates bots or any other computer code, file or program designed to tamper the outcome of an Online Game by providing an undue advantage or deceiving the user about the authenticity of another user or the nature of the Online Game.
 - Online Gaming Intermediaries will undertake regular audits to verify compliance with applicable laws.
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4. FINANCIAL SAFEGUARDS

- 4.1. Online Gaming Intermediaries will undertake KYC as per applicable law.
- 4.2. Online Gaming Intermediaries will endeavour to implement controls and preventive measures in accordance with industry best practices to detect and prevent the use of its platform for money laundering or other unlawful activities, and such measures shall be commensurate to the risk identified in its annual risk assessment.
- 4.3. Online Gaming Intermediaries shall mandate transactions exclusively through recognized digital banking channels, credit/debit cards, and approved mobile wallets, and shall not allow transactions in cash or cryptocurrency.
- 4.4. Online Gaming Intermediaries will not allow or facilitate transactions through unauthorized Payment Systems, or/and encourage or facilitate money laundering activities or transactions which are not in compliance with applicable laws
- 4.5. Online Gaming Intermediaries draft and publish on their website/platform terms and conditions and other policies which shall accurately and clearly specify the following:
 - the amount of platform fees charged;
 - the prizes and distribution of the prizes and

- the manner of determination of winners;
- measures taken to ensure protection of fund deposited by the player with the platform including its refund policy;
- timeline of withdrawal of deposited money or prize money won by the player;
- partnership with authorised and reputable payment processing entities to ensure the security and integrity of transactions.

4.6. Online Gaming Intermediaries will ensure that deposits/ payments for online gaming services are utilized only for playing games on the platform.

5. RESPONSIBLE ADVERTISING

5.1. Signatories endeavour to employ responsible advertising and marketing campaigns in conformity with existing laws, regulations, and guidelines for advertising.

5.2. Advertising and promotion of pay-to-play Online Games including any endorsement or signatory comments used by the operator for advertisements or promotions, will:

- be fair and truthful;
- not induce or entice minors to play online games;
- remain in compliance with the existing advertising standards of the Advertising Standards Council of India and any other relevant body;
- contain necessary disclaimers and warnings;
- not misrepresent information about winning probabilities;
- neither assert or suggest that participation in online gaming assures or guarantees winnings unless when it is a part of a scheme or promotion within the game.

- not mislead users, when any promotion or advertisement is conducted that identifies the total prize money of a game or contest, by-

Ensuring that the claims of total prize money are truthful, verifiable and not exaggerated;
Ensuring that reference to the total prize money in such advertisement does not directly or indirectly suggest that an individual user can win the total prize money if that is not the case and efforts are made to distinguish between individual prizes/ winnings & total prize money;

- not represent that the participation in Online Games is a source of sustenance or a means of earning a livelihood or an alternate source of income;
 - not promote online gaming as an alternative to employment, as a financial investment or as a requirement for financial security;
 - not imply that playing in online games will help fulfil social obligations or solve personal or financial problems;
 - not encourage online gaming as a means of recovering from past gaming sessions or any other financial losses;
 - not imply that chances of winnings increase the more one spends;
 - not suggest that online gaming can provide an escape from personal or professional problems;
 - not portray online gaming as being indispensable or as taking priority in life over other commitments;
 - not suggest that mere financial gains from online gaming can help improve self-esteem.
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6. SAFE, SECURE, AND RELIABLE GAMING:

- 6.1. Online Gaming Intermediaries will take all reasonable measures to ensure a secure and reliable gaming environment by adhering to existing regulations for cyber security under applicable laws.
- 6.2. Online Gaming Intermediaries will process and store digital personal and non-personal data in compliance with applicable data protection laws of India.
- 6.3. Online Gaming Intermediaries pledge to recognize and integrate evidence-based “best practices” for safer gaming and other operational aspects, and to contribute to pioneering concepts and initiatives addressing industry challenges.

Signatories to the **IAMAI Voluntary Code of Ethics for Online Gaming** commit to maintain a high priority channel for law enforcement and appropriate government agencies to take expeditious action on any reported violation of applicable laws or assist authorities in investigation. Online Gaming Intermediaries will also provide a declaration on their platform that they are compliant with applicable laws and regulations in India.
