

ABOUT THE CODE OF ETHICS

The Code of Ethics (“Code”) adopted by All India Gaming Federation (AIGF), E-Gaming Federation (EGF) and Federation of Indian Fantasy Sports (FIFS) (hereinafter collectively referred to as “federations”) aims to encourage responsible gaming practices and enforce consistent standards throughout the gaming ecosystem. By standardizing best practices, the Code ensures that all members of the federations focus on player welfare through the implementation of responsible gaming and advertising policies.

Regular audits and reporting mechanisms by the respective federations will promote accountability and transparency. Ultimately, this Code seeks to foster a safer environment for players and enhance the overall integrity of the gaming industry.

SECTION I. GENERAL PRINCIPLES

1. Applicability

This Code applies to all online gaming operators who are members of the federations (collectively referred to as 'Operators') and offer online skill based real money gaming services in India.

2. Objectives

The objective of this Code is to promote a responsible gaming framework and promote practices that encompass the following:

- (a) ensure adherence of applicable laws and regulations.
- (b) prevent underage people from playing online real money games;
- (c) protect vulnerable players;
- (d) ensure Operators conduct business in a fair and responsible manner;
- (e) ensure that the games being conducted are conducted fairly and transparently;
- (f) implement responsible advertising practices.

3. Regular Review of the Code of Ethics

- (a) This Code shall be reviewed and evaluated annually to ensure its effectiveness and compliance with industry and global best practices, as well as to confirm that the stated objectives are being met.
- (b) Any identified gaps shall be promptly addressed.

4. Effective Date of Compliance for all Online Gaming Operators

- (a) The effective date of compliance for Operators with annual revenue equal to or exceeding INR 100 crores shall be 6 months from the date of signing and adoption of this Code by the federations.
- (b) For Operators with annual revenue below INR 100 crores, the effective date of compliance shall be 9 months from the date of signing and adoption of this Code.

5. Audit and Monitoring Mechanism by Respective Federations

- (a) Each federation shall establish a comprehensive annual audit and monitoring framework to ensure compliance among member Operators. The framework shall include the following:
 - (i) Conduct thorough audits on a yearly basis to assess adherence to established regulations and guidelines.
 - (ii) Continuously monitor member platforms to identify and promptly address compliance issues.
 - (iii) Establish clear reporting protocols for member platforms to submit compliance documentation and findings from internal audits.
- (b) The specific modalities, timelines, processes and consequences of non-compliance

shall be determined by each federation in accordance with their operational needs and standards.

6. Certification

- (a) Each federation shall provide for a digital certificate to Operators who comply with this Code.
- (b) This certificate shall be valid for one year and shall be renewable annually upon completion of an audit, confirming the Operator's adherence to this Code.

SECTION II. RESPONSIBLE GAMING PRACTICES

7. Adherence to Regulatory Requirements

(a) Age Gating Principles

- (i) Players under the age of 18 shall not be permitted to participate in online real-money games.
- (ii) The Operators must obtain a declaration from the player of being above 18 at the time of registration or a player's first deposit in any online real money game, which can be achieved by requiring the player to provide either their date of birth, or by displaying a clear and prominent message requiring the player to confirm that they are over 18 years of age to participate in any pay-to-play games. Examples of such messaging include:

“You must be 18 years of age to play online real money games”.

“Players must be 18 years of age to play online real money games”.

“By registering, I confirm I am 18+ and agree to the Terms of Use”.

- (iii) The terms and conditions at the time of registration must clearly state that underage players are prohibited from playing any online real money game.
- (iv) Operators must not entice underage players through advertising and promotional strategies, including the use of “Free-to-Play” games/offers.
- (v) Operators must adhere to Know Your Customer (KYC) compliance procedures as outlined in *Clause 7(c)* to ensure that no players participating in online real money games are below 18 years of age.

(b) Operations in restricted States

- (i) Operators shall not permit players from restricted states to participate in online real money gaming.
- (ii) Operators are required to implement appropriate measures, including but not limited to GPS blocking, IP address filtering, or such other technological measures, to prevent players from restricted states from accessing their real money games.
- (iii) Operators must also adhere to Know Your Customer (KYC) compliance procedures as outlined in *Clause 7(c)* below.

(c) KYC mechanism

- (i) Phase 1: Creation of Account- Operators must collect following information from players before allowing them to participate in "Pay-to-Play" games.
 - a. Mobile number to be verified by a code sent to mobile number or email ID
 - b. Date of birth or age or confirmation that the player is over the age of 18;
- (ii) Operators are required to implement a robust password policy and/or alternative secure means of access, which may include biometric, PIN-based, mobile, or email-based access. These measures should align with the nature and scale of their business and adhere to best practices for financial transactions on the internet.
- (iii) It is acknowledged that significant challenges exist in conducting effective Know Your Customer (KYC) procedures due to the lack of authoritative databases for positively identifying individuals. However, the KYC documents collected and accepted by Operators must fully align with the database records maintained by the Operators.

Phase 2: KYC Compliance - KYC compliance is mandatory for all players upon making a withdrawal of ₹1000 or more, either as a one-time transaction or cumulatively, or upon making a cumulative lifetime deposit of ₹50,000 or more, whichever occurs first.

- (iv) It is hereby clarified that for the purposes of calculating deposit limits under this clause (iv), only deposits made from the date of effective compliance of this Code of Ethics, shall be considered .
- (v) A three-step KYC verification process shall be followed:
 - a. Identity proof for name and age verification: Any one of the following documents
 - 01. PAN card
 - 02. Aadhar card
 - 03. Passport
 - 04. Driving license
 - 05. Voter Id
 - b. Address proof: Any one of the following documents
 - 01. Aadhar card
 - 02. Passport
 - 03. Driving license
 - 04. Voter Id
 - 05. Electricity bill
 - 06. Landline telephone bill
 - c. Bank Account Validation (optional): Operators must validate the player's bank account through any of the following methods:
 - 01. Micro-deposit verification (commonly referred to as penny drop verification, where a small amount is transferred to the player's bank account to confirm account details)
 - 02. Instant account verification (commonly referred to as penny-less verification, where account details such as the bank account number and IFSC code are verified by a third-party service through a secure API)
 - 03. Such other equivalent measures

- (vi) Ration cards and gas bills may be accepted as address proof for previously

established accounts; however, Operators shall make efforts to update the KYC with the accepted documents as listed above.

(vii) Players participating in free mode are not subject to KYC requirements.

(viii) Operators must obtain banking details from players at the time of withdrawal of the amount specified in *Clause 7(c)(iv)* above. At the time of such withdrawal, Operators must ensure that the funds are being deposited into an account that matches the KYC documentation provided by the player, verifying the account details against the Operator's database.

8. Player Protection

(a) Data Protection

- (i) When a player authenticates and logs into their account through a mobile app, the data transmitted between the player's device and the Operator's systems shall be encrypted using TLS/SSL protocols and additional security controls like SSL pinning/Certificate transparency shall be in place.
- (ii) Operators shall possess a valid Extended Validation Certificate as specified by the TLS/SSL standard to ensure secure communications.
- (iii) Operators shall comply with all laws related to the protection and storage of personal data, including existing laws and, upon its implementation, the Digital Personal Data Protection Act, 2023.

(b) Player Fund Management

- (i) Operators shall in their terms and conditions:
 - 01. include comprehensive information about the functioning of player accounts in their terms and conditions.
 - 02. inform players of all rules and restrictions regarding deposits and withdrawals, as well as access to funds in connection with these transactions; and
 - 03. provide clear information regarding the measures implemented to protect player funds.
- (ii) Players' funds shall be held securely by the Operators in a separate account (which shall not be under sole control of the Operator) and the Operator shall ensure that players' funds are available to the players as per applicable/respective terms and conditions of the Operators.
- (iii) In the event a contest is abandoned due to lack of participation or cancellation of pre-defined criteria, the total amount of money paid by each player shall be refunded in full without retaining or deducting any fees, except for already concluded rounds or contests, unless specifically stated otherwise in advance.

9. Fair Gaming Practices to be followed by Operators

- (a) The use of bots or any form of gameplay manipulation shall be strictly prohibited by the Operators to maintain the integrity of the gaming experience. Operators must ensure that No Bot certification and RNG certification (where applicable) are obtained and considered as mandatory requirements to ensure fairness and compliance.

- (b) Operators shall ensure that no employee that has access to information, which can lead to unfair advantage in game play, is permitted to compete on their platform in contests with any cash/prize winnings against non-employees, except for testing purposes necessary for service improvement and addressing player issues. This policy shall be documented in the employee handbook or communicated through a separate policy.
- (c) Operator shall have documented internal guidelines for:
 - (i) Conducting test games and managing test accounts.
 - (ii) Detecting and controlling cheating and collusion among players.
- (d) Operators shall not facilitate the use of scripts that provide a user, or a limited set of players, with an unfair advantage in gameplay.
- (e) Operators shall ensure that players are provided adequate opportunity to exercise their own agency and skill.

10. Transparency on Information Provided to Players

- (a) The Operator shall maintain appropriate data relating to each game as specified by the federations, including but not limited to timestamp, game unique id etc. to ensure transparency is maintained.
- (b) Players shall be provided with accurate and unambiguous information regarding all aspects of the Operator, including games offered, bonuses, deposits, and withdrawal processes.
- (c) Operators shall provide a separate web page containing the terms and conditions and other policies related to their games, which must include, at a minimum, the following information:
 - (i) The version and date of the terms and conditions. After updating the version, the Operator must indicate the new version and notify players of any major changes (i.e., materially altering the legal relationship) via a method of communication determined by the Operator, such as a pop-up or email notification, if they log in within 20 days of the new version being published. The last three versions must be archived on the site.
 - (ii) The Operators' brand name, company name, company registration number of the Operator.
 - (iii) The email address for customer support.
 - (iv) The procedure for filing a complaint.
 - (v) The methods of payment available for deposits.
 - (vi) The methods available for withdrawals.
 - (vii) The terms and conditions of all current bonuses or promotions.
 - (viii) Details of grievance officer.
- (d) The link to the terms and conditions must be easily accessible through a hyperlink on the homepage, directing players to a dedicated web page containing the terms and conditions and other policies
- (e) Operators shall maintain a dedicated web page specifically for responsible gaming. The link to the Responsible Play web page shall be accessible from all pages of the Operator's website and a dedicated section in the mobile app to ensure easy navigation and access for players.

11. Enabled Informed Decision Making for the Players

(a) Option to close their account at their own free will

- (i) Players shall have the option to close their accounts at their own discretion, either through their account settings or by contacting customer support.
- (ii) If an account is closed, the Operator shall allow the player to withdraw any remaining funds or make all reasonable efforts to return such funds as per the applicable Terms & Conditions of the Operator. Any amounts that cannot be returned should be handled in accordance with the contractual agreements made with the players as outlined in the site's terms and conditions.

(b) Player defined limits and/or alerts

- (i) Operators shall offer players prominently displayed and easily accessible mechanisms to voluntarily set financial limits and/or alerts for losses and deposits on their gameplay. The platform may set default limits for players who have not set their own, in accordance with the platform's policies. Players shall be notified of these default limits and provided with the option to modify them within their account settings.
- (ii) Operators shall promptly and visibly display responsible play messages, as banners, pop-ups or overlay banners, or other similar means to nudge players to take breaks based on their set limits.
- (iii) If a player requests changes within the default limit range, such adjustments can be implemented immediately. However, if a player requests to exceed the default limits, the Operator shall implement this change only after a minimum waiting period of 24 hours and upon receipt of a self-declaration from the player affirming their financial capacity. This declaration can be provided via a check box or similar feature within the platform interface.
- (iv) Operators shall provide tools for players to set financial limits and monitor their usage in an easy and accessible manner by prominently displaying it on the app and/or website, as applicable. Additionally, these tools should be described in clear and understandable terms to facilitate player comprehension and engagement on app and website.

(c) Self-Exclusion feature

- (i) Operators shall provide a self-exclusion tool to players to voluntarily exclude themselves from playing online real money games
- (ii) Operators shall actively inform players about the self-exclusion feature, its importance, and the process for self-exclusion.
- (iii) The self-exclusion tool shall be easily accessible and prominently displayed on the app and/or website, as applicable. Additionally, information about the tool and its functionality shall be provided on the app and website.
- (iv) Operators shall offer a self-exclusion period with a minimum duration of at least 24 hours and upto a maximum duration of 3 months or more.
- (v) Operators shall offer various self-exclusion time intervals, allowing players to select

the specific duration for restriction.

- (vi) Once the self-exclusion period is set and confirmed, it shall generally not be reversed. However, players may request a one-time reversal due to human error, technical issues, or any other valid reason. Any subsequent request for reversal will not be entertained and the player will be required to complete the self-exclusion period.
- (vii) Operators shall not allow the creation of another account with the email ID of a self-excluded account and should implement a multiple ID detection process to discourage multiple account creation.
- (viii) Operators shall not send intentional push marketing messages or campaign-related communications to self-excluded players during the exclusion period.

12. Assisting Vulnerable Players




- (a) Federations shall endeavor to establish a unified definition of vulnerable players and maintain a database at the federation level, in compliance with data protection laws and other applicable regulations.
- (b) Federations shall also provide detailed guidelines outlining necessary actions for Operators, such as blocking access for identified vulnerable players.
- (c) Operators shall endeavor to establish a mechanism on their gaming application / website to provide a pop-up / trigger to the vulnerable player stating the time-period of play or money spent by the respective player and encourage them to take a break.
- (d) Federations shall endeavor to maintain a unified mental health helpline/ counseling support to assist vulnerable players with gaming related disorders.

SECTION III. RESPONSIBLE ADVERTISING

- 13.** Operators shall adhere to responsible advertising and marketing practices in compliance with all applicable laws, regulations, and guidelines including but not limited to the Advertising Standards Council of India, Consumer Protection Act 2019 (Central Consumer Protection Authority (CCPA) notification on Guidelines for Prevention of Misleading Advertisements and Endorsements for Misleading Advertisements, 2022) and Guidelines for Prevention and Regulation of Dark Patterns, 2023.
- 14.** Advertising and promotion of online real money games including any endorsement or signatory comments used by the Operator for advertisements or promotions, shall:
 - (a) be fair and truthful;
 - (b) not induce or entice minors to play online games;
 - (c) remain in compliance with the existing advertising standards of the Advertising Standards Council of India and any other relevant body;
 - (d) contain necessary disclaimers and warnings;
 - (e) not misrepresent information about winning probabilities;
 - (f) 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;
 - (g) not mislead players, through any promotion and/or advertisement that identifies the

total prize money of a game or contest, by –

- (i) ensuring that the claims of total prize money are truthful, verifiable and not exaggerated;
- (ii) ensuring that reference to the total prize money in such advertisement/promotion does not directly or indirectly suggest that an individual player 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.
- (h) 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;
- (i) not promote online gaming as an alternative to employment, as a financial investment or as a requirement for financial security;
- (j) not imply that playing in online games will help fulfill social obligations or solve personal or financial problems;
- (k) not encourage online gaming as a means of recovering from past gaming sessions or any other financial losses;
- (l) not imply that chances of winning increase, the more one spends;
- (m) not suggest that online gaming can provide an escape from personal or professional problems;
- (n) not portray online gaming as being indispensable or as taking priority in life over other commitments;
- (o) not suggest that mere financial gains from online gaming can help improve self-esteem.

Signed for and on behalf of AIGF	Signed for and on behalf of FIFS	Signed for and on behalf of EGF
 <p>Name: Mr. Roland Landers Designation: Chief Executive Officer</p>	 <p>Name: Maj. Neil Castelino Designation: Chief Executive Officer</p>	 <p>Name: Mr. Anuraag Saxena Designation: Chief Executive Officer</p>