



Media & Advertising Policy

Version Control

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MEDIA & ADVERTISING POLICY

Date: May 29, 2025

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1. Purpose

This policy ensures that all marketing, advertising, and media activities conducted on behalf of Moonrail Limited align with the requirements under the National Ordinance on Games of Chance (LOK, 2024), particularly those applicable to the offering of remote games of chance. It aims to uphold responsible gambling principles, prevent misleading promotion, and protect vulnerable persons, including minors.

2. Legal and Ethical Basis

Moonrail Limited is licensed under Curaçao's remote gaming regime. All communications and advertising are to be executed in a manner that ensures:

- The marketing does not encourage excessive gaming.
- The materials are not misleading in nature.
- Vulnerable Persons, including individuals under 18, self-excluded players, and those lacking control over gambling behavior, are not targeted or exposed to marketing.

These are mandatory conditions for responsible gaming operations, and failure to adhere may result in license revocation.

3. General Marketing Principles

All advertising materials must:

- Clearly include an 18+ or "Only for persons aged 18 and above" label.
- Display a "Play Responsibly" message.
- Be socially responsible and must not portray gambling as a solution to financial problems or a path to social success.

Not depict gambling in association with alcohol, violence, or dangerous behavior.

4. Prohibited Marketing Practices

The following practices are strictly prohibited:

- Portraying gambling as a rite of passage into adulthood or a sign of maturity.

- Suggesting that skill can eliminate chance or guarantee winnings.
- Using content, characters, or influencers that appeal to minors.
- Distributing ads via channels primarily accessed by minors or vulnerable groups.
- Advertising games based on real-world disasters, violence, or exploitation of humans or animals.

Additionally, Moonrail Limited and its agents may not offer credit or loans to players for gambling purposes.

5. Influencer, Streamer, and Affiliate Requirements

All influencers, streamers, and affiliates must:

- Sign a written agreement affirming compliance with this policy.
- Ensure age-gating measures (e.g., 18+ tags on Twitch/YouTube).
- Avoid hosting content that suggests gambling can be anonymous or risk-free.
- Clearly label any commercial sponsorship or partnership.
- Display prominent self-exclusion links and promote self-exclusion on request.

Failure to comply may result in termination of the agreement and notification to the Curaçao Gaming Authority (CGA).

6. Marketing Review and Approval

All marketing content (ads, banners, videos, texts) must:

- Be approved in advance by Moonrail Limited's Compliance Manager.

7. Vulnerable Person Safeguards

Moonrail Limited must ensure that no advertisements:

- Are delivered to, or are visible to, persons who have self-excluded or been excluded.

- Are placed in environments where persons under 18, form a substantial portion of the audience.

Every marketing campaign must include features to:

- Prevent exposure to underage users.
- Honor all player-initiated self-exclusion requests.
- Limit ad frequency and types for players at risk of excessive gambling.

These measures support mandatory safeguards to prevent excessive gambling and to protect individuals who lack control over their gaming behavior.

8. Jurisdictional Targeting

Marketing may only be directed at jurisdictions:

- Where Moonrail Limited is authorized to offer games of chance;
- That do not prohibit Curaçao-licensed remote gambling.

Geo-targeting tools must be employed to restrict traffic from restricted jurisdictions. Violation of this restriction is considered a breach of licensing obligations.

10. Enforcement and Sanctions

Violation of this Media & Advertising Policy may lead to:

- Immediate removal or takedown of content;
- Termination of third-party agreements;
- Reporting to the CGA;
- Internal disciplinary action.