

Code of Conduct

Association of Charity Lotteries in the European Union, *aisbl*



The *Association of Charity Lotteries in the European Union* (ACLEU) is first and foremost established to promote the fundraising model of charity lotteries throughout the European Union. Providing an independent, long term, and additional flow of funds for civil society is the primary aim of our members.

The vehicle by which we achieve this aim is through organising games of chance, and lotteries in particular. As an actor in this field, the members of ACLEU have set up a Code of Conduct, to show that the members take responsibility for the impact of their activities on participants, also with regard to responsible gaming.

This document does not substitute any applicable laws and regulations within each member's jurisdiction, but sets standards on operating a lottery in a responsible manner that ACLEU members commit to follow accordingly.

Infringements of this code of conduct will be made public via the ACLEU website www.acleu.eu
Significant or repeated violation will lead to exclusion of the member from ACLEU.

1. Payout to charities

The primary aim of ACLEU members is to raise funds for civil society. This is their *raison d'être* and distinguishes them from state or commercial operators.

ACLEU members ensure that the highest possible percentage of revenues is destined for charitable organisations. The actual percentage depends on national legislation and market situation. This percentage always meets the minimum legal requirements and is even higher with most members.

The beneficiaries are made known to the public in order for participants to know which organisations they support by playing the lottery.

2. Licence and legislation

ACLEU members operate charity lotteries with licences from national governments. All members comply with applicable national laws and other regulations in force, as well as with the licence terms and conditions.

3. Prize payout

ACLEU members ensure that adequate finances are available to pay all current obligations and that working capital is adequate to finance ongoing operations. ACLEU members ensure a prompt payout of prizes to winners.

4. Access to vulnerable groups

ACLEU members limit access to their services to vulnerable groups in accordance with national legislation. Vulnerable groups are those that are below the age of legal play in the respective jurisdiction, those that already have a gambling addiction, and/or those that are not aware of the risks associated with problem play. See also point 12 of this code of conduct.

5. Banking and transaction processing

ACLEU members conduct their banking and financial affairs in accordance with generally accepted standards of internationally recognized banking institutions. ACLEU members make use of safe and secure payment methods.

6. External auditing

ACLEU members comply with applicable national laws in reporting their financial data in an annual report or financial account which is assessed by an external audit company. Members' compliance with the licence terms and conditions is assessed on an annual basis by an external audit company.

All lottery drawings are performed in presence of a notary or subject to similar external auditing and all equipment is regularly tested by independent metrological institutions.

7. Consumer privacy and data protection

ACLEU members design and operate their systems to ensure the privacy of the participants and to protect confidential participant information.

8. Advertising and marketing

ACLEU members ensure that advertisements only contain factually correct information and no false or misleading information at all times. Most advertisements show the (work of) beneficiaries of the lotteries to show the participants where the money goes. This way, the advertisements serve as a platform for the beneficiaries of the lotteries.

ACLEU members do not state or suggest that participating is an alternative to work or a way out of financial difficulties.

ACLEU members ensure that they do not knowingly engage in the distribution of unsolicited advertisements (i.e. SPAM) either directly or through a third party. Participants that do not want to receive direct mail from the lottery are given the opportunity to opt-out. All email advertising has an unsubscribe or opt-out policy.

9. Prevention of criminality

ACLEU members take all necessary precautions to prevent criminal activities such as fraud and money laundering at all times. For instance, most ACLEU members operate by direct debit, which makes money laundering impossible as neither physical tickets nor cash payments are involved.

10. Information provision

ACLEU members make all relevant information available to their participants regarding their participation at all times. The game rules, as well as the terms and conditions of participation are transparent to all.

11. Integrity of software

ACLEU members make use of the most secure software tools available to ensure a safe processing of prize payout and payout to beneficiaries.

12. Problem gambling

ACLEU members attach great importance to responsible gaming. Research has shown that the weekly or monthly lottery draws that are performed by ACLEU members are non-addictive forms of games of chance. In addition, it was revealed that participating in these lotteries does not lead to participation in other -more addictive- forms of games of chance.¹

ACLEU members do not offer addictive forms of games of chance such as sports betting, casino games or slot machines.

13. Complaint procedure

ACLEU members give participants the opportunity to file complaints at all times.

¹ De Bruin et al., *The relationship between participation in number lotteries and gambling addiction in the Netherlands*, IVO/CVO, July 2008