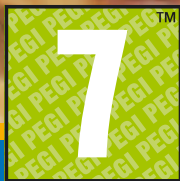


[www.pegi.info](http://www.pegi.info)



[www.pegi.info](http://www.pegi.info)



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[www.pegi.info](http://www.pegi.info)

# PEGI ANNUAL REPORT 2009



PEGI

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## INTRODUCTION

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Dear reader,

We all know how quickly technology moves on. Yesterday's marvel is tomorrow's museum piece. The same applies to games, although it is not just the core game technology that continues to develop at breakneck speed. The human machine interfaces we use to interact with games are becoming more sophisticated and at the same time, easier to use. The Wii Balance Board™ and the MotionPlus™, Microsoft's Project Natal and Sony's PlayStation® Eye are all reinventing how we interact with games, and in turn this is playing part in a greater shift. The migration of consoles from the children's room to the living room was initially forecast based on their use as media servers, but what really drove this migration was the development of games and new interfaces (controllers in game speak) that appealed to the whole family.

Now that consoles have secured their place in the living room, the generation and gender divides are being crossed too – while bearing in mind that a generation of gamers have grown into parenthood. Even grandma and granddad are quite happy to give it a go, because they can relate to the game and are no longer daunted by the controller. Besides, this migration has not stopped in the living room, in some households handheld consoles can now even be found in the kitchen – helping mum make the dinner as she uses her interactive cooking guide on a Nintendo DS™.

Widespread internet connectivity also puts to bed one of the long time fallacies that playing games was a solo experience. These days, sitting in a room by yourself doesn't mean you need to play alone – and even if you did play alone, lively discussions with friends still give it a social dimension.

All of these changes bring new challenges, which is why PEGI has spent the last 12 months consulting, benchmarking and ultimately evolving. It has often been said that the advantage of self-regulation is that it is more flexible than legislation and can adapt better to outside developments in a more timely manner. With PEGI we see this in action.

Therefore it is with great pleasure we announce PEGI 2.0. Throughout this report you will find evidence of changes and enhancements to PEGI. These range from more robust pre-screening of games to more complete inclusion of stakeholders through revised board structures to larger fines and stricter sanctions. And last but not least, much more user-friendly and intuitive age labels.

If the proof of the pudding is in the eating, then the confirmation of a system like PEGI is found in endorsement, acceptance and use. Today, PEGI is used and recognised in more than 30 countries throughout Europe and beyond. The UK government recently announced the adoption of the newly enhanced system as the sole method of classifying video games. On top of that, PEGI has the enthusiastic support of the European Institutions who consider it as a model of European harmonisation in the field of child protection. The European Commission's Communication of 26 April 2008 and the European Parliament's Resolution of 12 March 2009 on the protection of consumers, in particular minors, in respect of the use of video games have greatly helped us to steer PEGI in the right course for an ever more effective pan-European self-regulation system.

Simon Little  
Managing Director  
PEGI SA

### PEGI Mission statement

The Pan-European Game Information (PEGI) system aims to provide European consumers with information on game content from an independent source to allow them to make informed decisions on buying videogames.

The strength of PEGI originates in its unique ability to build upon a variety of input from governments, consumers, academia and industry throughout Europe.



## ■ CHAPTER 1

The PEGI system and how it functions



## CHAPTER 1

### The PEGI system and how it functions

PEGI is a system of voluntary self-regulation promoting the safe use of videogames. It is the first ever pan-European age rating scheme. It has been operating in Europe since April 2003 and provides the public (particularly parents) with an indication of the lower age for which the content of a game product is suitable. The system's efficiency is based on its ability to provide the consumer, at the time of purchase, with appropriate information and advice to consumers regarding the nature of the content and age suitability according to criteria developed and assessed by experts.

The PEGI system applies to all game software, whatever the format or platform involved, sold or distributed in the European Economic Area by any company subscribing to the standards. The European Union institutions, together with the vast majority of governments in the EU and the EEA, fully support the project.

PEGI rated products are marketed in the following 30 European countries:

Austria	Denmark	Hungary	Latvia	Norway	Slovenia
Belgium	Estonia	Iceland	Lithuania	Poland	Spain
Bulgaria	Finland	Ireland	Luxembourg	Portugal	Sweden
Cyprus	France	Israel	Malta	Romania	Switzerland
Czech Republic	Greece	Italy	Netherlands	Slovak Republic	United Kingdom



As for all self-regulated systems, the PEGI System is based on a Code of Conduct (See Annex 1), i.e. a set of rules, which every interactive software publisher using the PEGI System contractually commits to respect. This Code deals with age labelling, promotion and advertising of interactive products. It reflects the interactive software industry's commitment and concern to provide information to the public in a responsible manner. With about 12,500 games rated by the end of June 2009, the PEGI system has displayed a proven ability to rally virtually all publishers that make games available to the European market. Even more critically, the system has delivered in its prime objective to help parents make informed buying

decisions: they may now exercise their responsibility in regards to the selection of games that suit their family with utmost confidence.

The PEGI system was created by the Interactive Software Federation of Europe (ISFE) which is based in Belgium. ISFE has recently entrusted the day-to-day management and development of the system to PEGI S.A. and has contracted the administration of the system to the Netherlands Institute for the Classification of Audiovisual Media (NICAM) which is based in the Netherlands and the Video Standards Council (VSC) in the United Kingdom.

## AGE CATEGORIES

The age rating icons indicate the minimum age for which a game is considered suitable. After careful consideration, and with reference to the existing age categories used by national systems in Europe, the highest end of each bracket was chosen as the indicator. Under the PEGI system there are five age rating levels:



[www.pegi.info](http://www.pegi.info)



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[www.pegi.info](http://www.pegi.info)

In Portugal, the mandatory age categories differ slightly from PEGI age categories. In order to comply with the current national law of Portugal, all games rated 3 and 7 by PEGI are provided respectively with a 4 and a 6-rating logo.

PEGI ratings by age until June 2009:

Age class	Total	Percentage
3	6135	49%
7	1375	11%
12	2700	22%
16	1631	13%
18	589	5%
<b>TOTAL</b>	<b>12430</b>	<b>100</b>



## CONTENT DESCRIPTORS

Content descriptors are used in conjunction with the age rating icons to indicate the main reason(s) why a game is given a particular age rating.

The content descriptors provide additional information to customers (particularly parents and 'gatekeepers') to enable them to reach an informed decision. The descriptors also serve a useful purpose on a Europe-wide basis where there are differing views about levels of acceptability, particularly on the use of bad language and to an extent on matters of sex and nudity.

The age rating icon is shown on the front and back of the game box. On the back, they can be accompanied by content descriptor icons. In the UK, extended written advice will also be added – so as to match existing systems.



Game may contain some kind of depiction of violence. In games rated 7 any violence can only be non-realistic or non-detailed violence. Games rated 12 can include violence in a fantasy environment, whereas games rated 16 or 18 can have increasingly more realistic-looking violence.



This descriptor may appear on 7-rated games with pictures or sounds that could be frightening to young children.



Game contains bad language, which may include mild swearing or offensive language in games rated 12, or blasphemy and sexual expletives in games rated 16 or 18.



Game may encourage the use of tobacco or alcohol in games rated 16 or depict illegal drugs in 18-rated titles.



This descriptor can only appear on games rated 18 containing depictions of ethnic, religious, nationalistic or other stereotypes that could encourage hatred. It is rarely used in contemporary games – and more likely appears in games with historical situations (such as Second World War re-enactments).



Used for games rated 12, 16 or 18 that may encourage or teach gambling for money normally played in casinos, gambling halls, racetracks, etc.



Game can be played online.



Games depicting nudity or references to sexual behaviour. In games rated 12 this may include words or activities with obvious sexual innuendo. In 16-rated games depictions of erotic or sexual nudity may feature and in 18-rated games explicit images of sexual activity may be included.





## THE PEGI OK LABEL



Nowadays, many websites and online services contain small games, some used as teasers, some as topical entertainment to attract visitors and some as commercial goods for sale. In order to cover the rapidly growing number of online, casual games, the PEGI OK label was devised. When a small online game on a website has been labelled 'PEGI OK', it means that the game can safely be played by players of all age groups because it does not contain potentially unsuitable game content at all.

The PEGI OK label indicates that the PEGI rating criteria have been rigorously applied and that there is nothing in the game that would lead to a higher rating than a standard 3-rating. The operator of a website or games portal is permitted to use the PEGI OK label based upon a declaration made to PEGI that the game does not contain any material that requires a formal rating.

To qualify for the PEGI OK label a game can NOT contain any of the following elements:

- violence
- nudity, sexual activity or sexual innuendo
- bad language
- gambling
- promotion or use of drugs
- promotion of alcohol or tobacco
- scary scenes

Should the game contain any of these elements, the game must be formally age rated using the PEGI rating system. The game must also be rated using the full PEGI system if the casual game can be downloaded onto a consumer's computer or if a fee is charged in order to play the game.

## PARENTAL CONTROL SYSTEMS IN GAMING CONSOLES

Today, almost all gaming consoles, mobile devices and PC operating systems come equipped with parental control systems, enabling parents to block access to content that is unsuitable for their children and/or restrict access during certain hours. These control systems take into account the different age classification systems for videogames that are available worldwide, including PEGI.

There are varying methods of controlling access:

- controls that change and set restriction to decide, case by case, which type of games your children can play
- controlling access to the internet from consoles and handheld devices
- controlling the amount of time that children can spend on the console
- controlling the ability to interact with other players.

### Playstation®3 Parental Controls

Parents can use the Controls to determine what content younger players can access by restricting the types of games being played. Levels indicate the amount of access that is allowed. The lower the level selected, the greater the restriction imposed. Next to that, the PS3™ has Internet Browser Start Control, requiring anyone who wants to access the internet to enter a password.



<http://ps-playsafeonline.com>

Parental control level	PEGI age rating group
9	 www.pegi.info
7	 www.pegi.info
5	 www.pegi.info
3	 www.pegi.info
2	 www.pegi.info

## Wii™ Parental Controls

The Wii Parental Controls allow parents to adjust the highest PEGI game rating allowed on a certain console and to allow or restrict internet access (web browser, messaging, acquiring downloads, etc.). If Parental Controls are applied and a user attempts to play or download content that exceeds the Parental Controls setting, the user will be prompted to enter the Parental Controls PIN to temporarily disable them.

<http://wiiportal.nintendo-europe.com/428.html>



## Xbox 360™ Family Settings:

The Xbox 360 has two levels of settings - the Console Controls that dictate the behavior of the console offline, and the Xbox Live® Controls that set different levels of protection for online gameplay. The former allow parents to limit the games that can be played based on the PEGI rating levels and set time limits for gaming, while the latter let parents decide which games can be played online, what content can be downloaded, the privacy status of a someone's gamer profile and the ability to communicate with anyone, friends only, or no-one.



Microsoft has also launched 'Play Smart Play Safe!', a campaign aimed at educating parents about the various tools Microsoft has made available to help create a safer gaming and online environment for kids.

<http://www.xbox.com/en-GB/support/xbox360/familysettings/xboxlivecontrols.htm>  
<http://www.xbox.com/en-GB/playsmart/>

## GAMER PROFILE

**Name:** Bert (nickname: Extrabert)

**Age:** 33

**Profession:** Teacher

**Favourite games:** Forza Motorsport 2, Prince of Persia, MotoGP07, GTA IV

**Platform(s):** Xbox 360

My earliest recollection of a video game is The Smurfs, that I played on my CBS Coleovision console. And of course, the classic Microsoft Flight Simulator on MS-DOS! As a teacher, I only have a limited amount of time to spend on videogames nowadays. But I do enjoy racing games in general, and I play these around three times a week for about 2 hours.

I have become aware that there is such a thing like the PEGI game rating via game trailers, and indirectly by the commotion that some games have caused in the past. As a future parent, I am much in favor of a rating system because it

gives parents a benchmark to base their decisions on. Picking a suitable game for a certain age class is crucial. As a parent it is important to realize that games have become just as diverse as movies. It forces parents to show genuine interest in their children's gaming habits and it once again tells to never judge a book – or game – by its cover!

As a gamer, I am interested to hear that there are games specifically developed for grown-ups, which adds to their appeal for me.



## STEPS OF THE RATING PROCESS

The rating procedure is as follows:

- Prior to release, publishers fill in an on-line product assessment and declaration form, for their product and each version thereof. (See Annex 4) The first part of the form will prompt the publisher to check whether the product is subject to legal provisions in certain European countries (legal classification, limited distribution or prohibition). In such case, PEGI must be used in accordance with local rules in these countries.
- The second part of the assessment form considers the content of the product, taking into account the possible presence of violence, sex, discrimination and other sensitive image or sound content.
- According to the responses given, the online system automatically determines a provisional age rating, along with content descriptors indicating the reason why the entertainment software has been classified in the selected age category.
- The PEGI administrator thoroughly reviews the provisional age ratings. NICAM takes care of the games rated 3 and 7, whereas the VSC reviews the 12, 16 and 18 ratings.
- PEGI subsequently delivers a license to the publisher for the use of the age rating icon together with the related content descriptor(s).
- The publisher is now authorised to reproduce the appropriate age rating logo and content descriptor(s) on the packaging in accordance with the system rules and the PEGI Code of Conduct.



## ARCHIVE LIBRARY

The PEGI administrator has set up an archive library of all marketed products rated under the PEGI system. Publishers must, within ten working days of a product's release date, provide the administrator with a copy of each rated item. Where an item of entertainment software has been rated for different platforms a copy on each platform is provided.

The archive library currently counts over 9,000 copies of games that were released in Europe since the launch of the PEGI system. Every game is checked to ensure the correct PEGI age rating and content descriptors are displayed.





## GAMER PROFILE

**Name:** Patrick Keating (Grauniad)

**Age:** 30

**Profession:** Political Communications Manager

**Favourite games:** Halo 3, Battlefield, Call of Duty, EA Sports NHL franchise

**Platform(s):** PC, Xbox 360, Wii, iPhone

I have been playing for almost as long as I can remember. We always had computers in the house, so my gaming life started on a Commodore 64. The first titles I remember were text adventures such as the Hobbit or Hitchhikers' Guide, as well as some very simple graphic games like Tiny Tute. I kept pace with developing technology and gaming trends through the 90's, enjoying classics such as Ultima, Wing Commander and the first shooters like Doom and Quake. In university, I started playing multiplayer versions of Half-life, Fifa and Age of Empires as my flatmates and I networked our flat.

Nowadays, as a working stiff with a proper social life, I do not have as much time as I would like to play, so I focus on games

I can quickly dip in and out of on the Xbox 360. These are mostly immersive first person shooters such as Halo 3 or Call of Duty.

When I have some friends around, sports games like the EA sports titles, or cooperative shooters like Gears of War are always a popular way of enjoying video games together.

I increasingly play online, as the challenge of playing against real people is far more satisfying

than taking on predictable computer-controlled opponents. Currently, I'd say 75% of my gaming time is spent online.

I now play on the Xbox about four or five times a week, usually a quick online session of Halo or similar after work for about an hour, and then maybe a longer session on the weekend. Sometimes, those can last all day, especially if a friend and I are battling through some game in co-op mode! I play iPhone games very often, but just for a few minutes at a time, usually when crammed into a metro, waiting for a bus, or when waiting in the shops for my girlfriend to try on some new outfit.

I have been aware of the PEGI rating for some time, both from game packaging as well as following the debate on game ratings in the media. I think gamers in my age bracket don't care that much about the rating for games they play themselves. In fact, a high age rating is almost seen as a guarantee that the content of the game will be interesting and aimed at a grown-up audience. As with films, most guys would rather see the R-rated action film than the G-rated cartoon about fluffy animals.

I think the rating system is useful for parents who are not gamers, and who don't know what game content can be like. While I'm not one of those people who blame violent video games for all of society's ills, I also don't think it is wise for small children to be playing GTA IV. While ratings can be a useful tool in deciding what might be appropriate for kids, the ultimate solution is for parents to gain an understanding of games, and maybe occasionally play with their kids. This actually starts to happen as my generation – the first to grow up with video games – begins to have children.





■ **CHAPTER 2**  
The PEGI Organisation



## CHAPTER 2

# The PEGI Organisation

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## THE PEGI STRUCTURE

### PEGI S.A.

The PEGI system was founded by the Interactive Software Federation of Europe (ISFE) which has entrusted PEGI S.A. with the day-to-day management, supervision and development of the rating system. PEGI S.A. is an independent non-for-profit company with a social purpose established under Belgian law.

### Boards and Committees

The aim of PEGI is to protect minors from exposure to potentially unsuitable game content and to ensure that games are sold in a responsible manner. In order to fulfill these objectives in the broadest sense, PEGI is steered and draws on wide experience by way of a number of boards and committee as envisaged in clause 2 in the PEGI Code of Conduct.

### The PEGI Congress

The Congress is a new concept for PEGI. It will become the organ where all the videogame's stakeholders, including publishers, retailers, parent associations, educators, governments, international organizations and researchers, meet to openly discuss the system of protection of minors. The Congress shall meet every one or two years depending on circumstances in the form of a large international conference. All bodies of PEGI may suggest Congress participants, the aim being to consult widely.

### PEGI Management Board

While the independent organisations of NICAM and the VSC grant the PEGI ratings, PEGI itself remains a self-regulation system. The new PEGI Management Board is the core of this. The Managing Director is responsible, following guidance from this Management Board for running the day-to-day activities of PEGI. The board is made up of representatives of; the users of PEGI (games publishers), the gatekeepers of PEGI (the game console manufactures) and the promoters of PEGI (national trade associations) plus representatives from the PEGI Council and the PEGI Experts Group. This board structure ensures there is proper oversight whilst not weakening PEGI's strength in getting things done efficiently. The importance of effective action via a coalition from within PEGI cannot be overstated.

### PEGI Council

With PEGI in use in over 30 countries it is vital that the system and the code of conduct keeps in tune with social, political and legal developments in all of these countries. This is why the old PEGI Advisory Board is evolving into the new PEGI Council. The Council is responsible for making recommendations so that national as well as European developments are communicated and reflected in the PEGI system and its code of conduct. The Council gives the PEGI countries a voice. Of equal importance is for the authorities in the PEGI countries to keep abreast of and be involved in PEGI. The Council ensures this two-way flow of information. Members of the Council are appointed for a 2-year term. They are primarily recruited from the authorities in the PEGI countries, working as psychologists, media specialists, civil servants, and legal advisers versed in the protection of minors in Europe.

Members of the PEGI Advisory Board (June 2009\*):

Name	Institution	Country
Antonio Xavier	Portuguese Film Classification Commission	Portugal
Rita Astridsdotter Brudalen	Norwegian Media Authority	Norway
Jan Christofferson	Swedish Media Council	Sweden
Ger Connolly	Irish Film Censor's Office	Ireland
David Cooke	British Board of Film Classification	UK
Isabelle Falque-Pierrotin	Internet Rights Forum	France
Roberto Genovesi	Ministry of Economic Development & Communication	Italy
Jeffrey Goldstein	University of Utrecht	The Netherlands
Kristina Hautala-Kajos	Finnish Ministry of Education and Culture	Finland
Rafal Lew-Starowicz	Office of the Government Plenipotentiary for Equal Treatment	Poland
Spyros Pappas	Pappas Associates	Greece
Herbert Rosenstingl	Austrian Ministry for Health, Family & Youth	Austria
Georges Reniers	Belgian Film Classification Commission	Belgium
Robert Soisson	Ombudscommittee for the Rights of the Child	Luxembourg
Anne Mette Thorhaug	Danish Media Council	Denmark

\*As of October 2009, the new PEGI Council will replace the Advisory Board

## PEGI Experts Group

With the Council's focus moving towards country representation it was considered important not to lose the network of technical experts that have been an important source of advice for PEGI over the years. During the course of 2009-10 the Experts Group will be enhanced by involving specialists and academics in the fields of media, psychology, classification, legal, technology, online games and so on. They will continue to advise PEGI by considering technological and content development as recommended by the PEGI Council, the PEGI Management Board or through circumstances brought to light by the complaints procedure.

## Complaints Board

The Complaints Board comprises a pool of independent experts from different countries appointed by the Management Board for a 2-year term. Members are recruited for their skill, experience and field of activity. These are parent/consumer bodies, child psychologists, media specialists, academics and legal advisers versed in the protection of minors in Europe.



## Complaints Procedure

Should a complaint be received from a publisher or a consumer regarding a rating attributed to a product, and no satisfactory settlement can be reached by the PEGI administrator through discussion, explanation or negotiation, the complainant may formally request the Complaints Board to mediate. The Managing Director of PEGI S.A. then selects three members from the board's pool to form an ad hoc complaint board (AHCB) designating one of the three as chair. The AHCB is selected according to the nature of the complaint and the skills required to resolve it. Following that, copies of the complaint and all relevant documents received from the complainant are sent to the members of the Complaints Board and the defendant. The Complaints Board may require any additional information relevant to the complaint to be submitted by any of the parties concerned, (i.e. the complainant, the defendant or the PEGI system administrator).

The board meets in person if necessary or, if acceptable, considers the facts individually and confers via email or telephone. Decisions by the Complaints Board are passed by simple majority vote. If the board concludes that a publisher is in breach of any part of the Code of Conduct, it has the authority to instruct the enforcement committee to take appropriate measures. If the board concludes an entertainment software product has been inappropriately rated, it can order a re-rating. Subscribers to the PEGI system, e.g. publishers, are bound by decisions taken by the Complaints Board by virtue of the Code of Conduct. Consequently, subscribers find themselves under obligation to carry out any corrective actions required of them and, in cases of non-compliance, are subject to sanctions as laid out by the code.

Complaints Board members:

Name	Country
Laurent Baup	France
Jesus De Benito Gil	Spain
Ger Connolly	Ireland
Guy Cumberbatch	UK
Lourdes Dietta	Spain
Lars Gjerlufsen	Denmark
Jeffrey Goldstein	NL
Maarit Pietinen	Finland
Iain Muir	UK
Spyros Pappas	Greece
Eva Petersson	Sweden
Jean-Pierre Quignaux	France
Georges Reniers	Belgium
Odd Arild Olsen	Norway
Dominika Urbańska - Galanciak	Danish Media Council
Annemarie Walker	NL
Rosemary Walker	UK
Antonio Xavier	Portugal

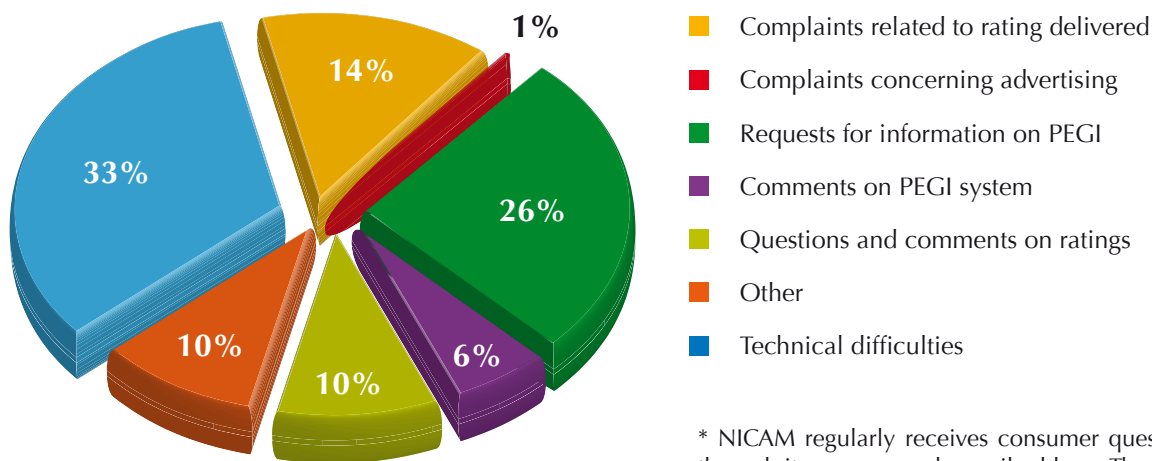




### Queries and complaints received via the 'Online Hotline'

The PEGI Administrator receives a sizeable amount of questions and complaints each month about the PEGI rating system. These queries comprise a plethora of topics, but there is a clear trend that shows that the amount of technical questions about the rating is on the decrease, while enquiries or complaints with respect to the content of games is clearly growing. It confirms the growing familiarity with the PEGI rating system.

### Queries and complaints by consumers



\* NICAM regularly receives consumer questions regarding PEGI through its own general e-mail address. These are listed as Other.

Type of reaction:	07-08	08-08	09-08	10-08	11-08	12-08	01-09	02-09	03-09	04-09	05-09	06-09	Year total
Complaints related to rating delivered	20	12	29	21	45	19	15	20	19	12	17	11	240
Complaints concerning advertising	2	0	0	0	5	2	2	0	2	1	2	0	16
Requests for information on PEGI	59	12	38	52	59	27	45	18	34	22	23	41	430
Comments on PEGI system	8	4	5	4	20	9	6	0	6	4	9	19	94
Questions and comments on ratings	3	0	1	0	1	0	7	29	35	30	24	30	160
Other	20	5	16	10	13	9	10	10	19	9	8	34	163
Technical difficulties	49	28	67	54	42	49	67	43	55	35	31	38	558
<b>TOTAL</b>	<b>161</b>	<b>61</b>	<b>156</b>	<b>141</b>	<b>185</b>	<b>115</b>	<b>152</b>	<b>120</b>	<b>170</b>	<b>113</b>	<b>114</b>	<b>173</b>	<b>1661</b>

## Some typical examples of information requests:

### Questions or comments about a rating

Hello there,

I'm just wondering why you gave Prototype such a high rating - I mean it really doesn't look that bad - no blood sprays over the screen, and I understand there is a reasonable amount of gore and violence, but not enough to be rated an 18? Or maybe I've missed something. Please enlighten me why you made this decision because me and my dad really want to know. Thank you for your time.

R.H.

Name of the interactive software:

Prototype Xbox 360

Name of the publisher:

Activision Blizzard UK Ltd.

Platform of the interactive software:

XBox 360

### Information on the PEGI System

Hello,

just a query regarding your rating system. I have recently been researching the gambling rating for your system, if a game was to feature anything relevant to gambling, what is the minimum age rating?

M.F.



### Questions or comments about a rating

My 8 year old is a big fan of Indiana Jones and would love to have the above title. I'm confused as to the rating (16) as even quite violent-looking games have lower ratings. Could you give some specific detail as to why this rating is so high? Thank you so much.

D. G.

Name of the interactive software:

Indiana Jones and the Staff of Kings

Name of the publisher:

Lucasarts

Platform of the interactive software:

Nintendo Wii - Virtual Console

## THE FOUNDER: ISFE

The Interactive Software Federation of Europe (ISFE) was established in 1998 to represent the interests of the interactive software sector vis-à-vis the EU and international institutions. Initially founded by the national interactive software trade associations in the UK, France, Germany and the Netherlands, ISFE was enlarged in January 2002 to include any transnational company representing the industry within the 27 Member States plus Norway, Iceland, Switzerland and Liechtenstein. Today, ISFE membership comprises 13 major publishers of interactive software and 14 interactive software trade associations throughout Europe.

### ISFE Board members:

Name	Company or trade association
Jens-Uwe Intat (chairman)	Electronic Arts
Michael Rawlinson (treasurer)	ELSPA (UK)
Ginni Arnold	Microsoft
Thierry Braille	The Walt Disney Company
Georges Fornay	Sony Computer Entertainment Europe
Alberto Gonzalez-Lorca	ADESE (Spain)
Matthew Hill	Nintendo
Henk Hoogendoorn	BEA (Belgium)
Jay Komars	Activision
Jean-Claude Larue	SELL (France)
Ian Livingstone	Eidos
Thalita Malago	AESVI (Italy)
Per Strombäck	MDTS (Sweden)
Dominika Urbanska - Galanciak	Spidor (Poland)
Olaf Wolters	BIU (Germany)



## THE PEGI ADMINISTRATOR: NICAM



N I C A M

NICAM is the Netherlands Institute for the Classification of Audio-visual Media. It brings together all Dutch public service and commercial broadcasting organisations, computer games distributors, film and video producers, video stores and retailers. Three government departments were involved in the establishment of NICAM. In addition, a large number of academics and other organisations have links with NICAM through their membership of the advisory committee or the independent complaints and appeals boards.

NICAM was set up in the year 2000 to provide an effective and uniform system of classification for all audiovisual media. NICAM draws up classification guidelines, deals with complaints and provides consumers with descriptive information about films, TV programmes and videos/DVDs and video games, allowing the consumer to make a rational decision as to whether or not a certain product is suitable for young people of a specific age group.

NICAM was established in response to a directive of the European Commission requiring member states to take steps to protect minors from harmful audiovisual content.



**Wim Bekkers** is the Director of NICAM. From 1978 until 2000 he managed several departments at the Dutch Broadcasting Foundation NOS, such as Audience Research and Documentation & Library. In 1998 he was elected vice president of the European Broadcasting Union's group of European audience researchers and went on to preside it in 1999. He joined NICAM in 2000 to establish and run the institute.

**Maud Stevens** joined NICAM in 2003 after earning a degree in communication at the University of Nijmegen. Starting at the complaints department of Kijkwijzer, the Dutch classification system for audiovisual media, she later moved on to the PEGI administration team. In this function she served as a 'help-desk' to all PEGI coders. Since the PEGI system has grown, so has the PEGI Administration and today, Maud is the PEGI Coordinator at NICAM, managing all coder and consumer affairs, as well as maintaining a close working relationship with both PEGI S.A. and the VSC.

**Martijn Huigsloot** is the deputy PEGI coordinator at NICAM. He joined the NICAM organisation full-time in April 2007, but has been a part-time game tester since 2004. He completed studies of communication science at the University of Amsterdam and wrote his final thesis on the attraction of video games to male adults. In his former job he was a trainer in communication skills at a customer care centre. Currently, Martijn assists Maud Stevens with her PEGI activities.

**Lodewijk Schuring** is a PEGI game examiner at NICAM. In 2007 he became a full-time team member with responsibility for the pre-examination of all 12-rated games. He completed studies in communication science at the University of Amsterdam and wrote his final thesis on gaming and the recognition and recollection of advertisements in videogames.

**Hanneke Jansen** has been a member of the PEGI team since February of 2009, after completing a Master in Journalism at the University of Groningen and a Bachelor studies in Philosophy at the University of Nijmegen. She was a games critic for a Dutch newspaper before joining NICAM. At the PEGI Administration she handles all consumer related e-mail and she assists Lodewijk with the pre-examination of all 3- and 7-rated games.

**Jonne Speelman** is a game examiner at NICAM since 2004. He studies law and examines 3 and 7 rated games for PEGI.

**Stefan Droog** is a game examiner at NICAM since 2009. He studies communication science and examines 3 and 7 rated games for PEGI.

**Marjolein Pronk** is a game examiner at NICAM since 2009. She studies game design and examines 3 and 7 rated games for PEGI.



## THE PEGI ADMINISTRATOR: VSC



The Video Standards Council examines all games applying for a 12, 16 and 18 rating under the PEGI system to ensure that such games have been correctly rated. It has now been announced by the UK government that the VSC will become the statutory body in the UK for legally classifying games using the PEGI system.

The VSC was established at the request of the UK Government in 1989 as a non-profit making body set up to develop and oversee a Code of Practice designed to promote high standards within the video industry. In 1993 the Code was expanded to promote high standards within the computer games industry. The VSC membership covers all sectors of the video and video games industries.

In 1994 the VSC joined forces with the Entertainment & Leisure Software Publishers Association to establish the ELSPA system for the voluntary age rating of video games in the UK. In 2003, the ELSPA system was superseded by the PEGI system and since then, the VSC has worked as joint administrator of the PEGI system together with NICAM in the Netherlands.

**Laurie Hall** is a qualified lawyer with over 35 years experience in the music, video and computer games industries. He has been with the VSC since 1989 and is now Director General. In 1994 he was closely involved in the establishment of the ELSPA games rating system in the UK. In 2001 he became part of the pan-European team responsible for PEGI's establishment and launch.

**Peter Darby** is a former long serving senior police officer. He joined the VSC in 2003 at the time PEGI was being launched across Europe. He is now Director of Operations and is responsible for all aspects of PEGI administration.

**Len Somers** is also a former long serving senior police officer. He joined the VSC in 2009 as Games Rating Manager responsible for the management of the VSC game examination team.



## PEGI IN THE UK – A CASE STUDY?

In June 2009 the UK government announced that it would adopt PEGI as the sole classification system for games in the UK. How did that come about and how will it change things?

### The Background

The announcement followed an in-depth period of consultation by the British Government that started with Professor Tanya Byron's landmark report *Safer Children In A Digital World*, published in March 2008.

It also follows 6 months of intensive review and development of the PEGI system, using both the Byron Review and the Commission Communication as a benchmark, which resulted in the set of enhancements to create what is being called 'PEGI 2.0'.

### The Existing System

Currently two sets of symbols can be found on video games sold in the UK: BBFC and PEGI. Under the existing system, the BBFC has a legal duty to classify games that depict "gross violence or sexual content". All other games are classified on a voluntary basis under the PEGI system.

### The Changes Announced

The new system will extend PEGI's remit so that all games are classified using its symbols.

The Video Standards Council (VSC), the PEGI administrator in the UK, will take a new statutory role and as the statutory authority, will have the power to ban games that are inappropriate for release in the UK (based on an assessment of likely harm).

Selling a video game rated 12 or over to an underage person will become illegal for the first time.

This new system will work alongside the regulation of Films and DVDs carried out by the British Board of Film Classification, to ensure that consumers have the strongest possible protection across these media. The new regime will not disturb BBFC's jurisdiction in respect of linear material.

When announcing the decision, Creative Industries Minister Siôn Simon said:

"Protecting children and giving parents a clear and robust new system has always been our starting point. The new system of classification follows the essential criteria set out by Professor Tanya Byron, who recommended a trustworthy,

uniform and clear set of symbols that is flexible and future proof.

"The UK already has a robust system of classification for films and DVDs run by the BBFC. The new system of games classification will match those high standards as this important market continues to evolve."

Professor Byron supported the decision and recognized the recent improvements to PEGI by saying:

"In my review to Government I identified the need to improve the video games classification system. I identified some fundamental criteria including making games suitable for 12-year-olds and above subject to statutory control. I also said the system had to have child safety at its heart and have the ability to adapt to future challenges. All these criteria are important for ensuring that parents have the tools they need to make informed choices and keep their children safe.

"The PEGI system has been strengthened since my review and the Government has consulted widely on each of my suggested criteria. I support the Government's decision to combine the PEGI system with UK statutory oversight."

## PEGI CODERS

As of June 2009 more than 400 publishers have joined the PEGI system (see full list in annex 3). Signatories must ensure that all personnel responsible for rating games are registered with NICAM as 'registered coders'. All registered coders are given a unique access code to enable them to use the on-line registration site. They are directly responsible for submitting video games and related media for classification and

constitute an important link between the publisher and the administrator. Regular training sessions in different European countries are organized by NICAM in order to keep coders up to date on administrative, technical and procedural issues as well as new legislative developments.

## PEGI Coder Conferences

The PEGI Administration regularly organises Coder Conferences to offer the games industry a face-to-face opportunity so they can fully understand the PEGI rating system and its submission procedures.

During a typical conference, the PEGI Administrators explain the entire online workflow and go through the full PEGI questionnaire to explain its proper interpretation with use of examples. Furthermore, they address any new developments in relation to the PEGI system. The coder training sessions offer a chance for coders to speak directly to the PEGI Administration concerning any questions and rating issues they may have.

On the 5th of June 2009, the PEGI Administration organized another successful coders' conference in London. About 70 coders met with the PEGI Administrators to discuss details of the rating system. The interaction with coders from many different industry players generates a large amount of valuable feedback, which helps to support the accessibility and flexibility of the system.

Next to the Coder Conferences, the PEGI Administration has organised three separate in-house training sessions for industry members. These events can reach a multi-disciplinary audience of developers, marketers, managers and others to broaden the understanding of the rating system within a specific organisation.



## GAMER PROFILE

**Name:** Florence Feys      **Age:** 24  
**Profession:** Communication Coordinator  
**Favorite games:** Counter-Strike, Zelda.

Having two older brothers, it was no more than natural that I started playing videogames at a young age. When I was 16 and powerful computers and fast internet had appeared, I discovered online games like Counter-Strike. I played it rather intensively during 5 years and actually participated in international competitions. Then, girl gamers were still a novelty, whereas professional competitions now have lots of girl gamers alongside boys teams.

I not only liked the game but also the community of gamers around it. I met and played with people from all around the world, which is just amazing when you are a teenager. Playing on an international competition level takes a lot of training though. It is much like trying to become the best in a sports discipline. I stopped playing about four years ago since I no longer had the time for it. Meanwhile I graduated, found a job and took time for other things in life. I still play games occasionally, and I regularly meet with some of the friends I made via Counter-Strike.

When I was a teenage gamer, PEGI had only just appeared on game boxes. Obviously there's some sort of violence in Counter-Strike, because it's a game about war tactics. But it is not exaggerated, horror-like violence – something I personally don't like. If I think about having children in the future, I know what advice to give because I'm a gamer myself. But for parents that have no experience with videogames, it is really necessary to know what a game can be about. I'm only worried that people don't care enough about classifications and their meanings.

Playing games is a hobby and it involves risks like everything else, but parents have the responsibility to guide children in their choices, not just videogames. Beside that, I think schools should play a role by teaching about online behavior. The PEGI system is just the beginning: many stakeholders – parents, schools, friends, policy makers, etc. – need to help to increase a well-informed awareness about video games.





**CHAPTER 3**  
**the PEGI Online system**  
*a vital addition to the PEGI system*



## CHAPTER 3

### the PEGI Online system - a vital addition to the PEGI system

PEGI Online was launched in 2007 as an addition to the PEGI system and over the past two years visitor traffic has steadily increased. Its purpose is to give young people in Europe better protection against unsuitable gaming content and to help parents understand the risks within this environment.

PEGI Online consists of four parts:

- the PEGI Online safety code and framework contract
- the PEGI Online label which will be displayed by holders of a licence
- [www.pegionline.eu](http://www.pegionline.eu): a dedicated website for applicants and for the general public
- an independent administration, advice and dispute settlement process



The licence to display the PEGI Online label is granted by the PEGI Online administrator to any online gameplay service provider that meets the requirements set out in the PEGI Online safety code (POSC).



#### The main provisions of the POSC are:

##### Age-rated game content

Only game content that has been appropriately rated under the PEGI or another recognised European system will be included on a site.

##### Appropriate reporting mechanisms

Appropriate mechanisms will be in place to allow game players to report the existence of undesirable content on any related websites.

##### Removal of inappropriate content

Licence holders will use their best endeavours to ensure that online services under their control are kept free of any content which is illegal, offensive, obscene or which might permanently impair the development of young people.

##### A coherent privacy policy

Any PEGI Online licence holder collecting personal information from subscribers will maintain an effective and coherent privacy policy in accordance with European Union and national Data Protection laws.

##### Community standards for online subscribers

PEGI Online licence holders will prohibit subscribers from introducing content or indulging in online behaviour which is illegal, offensive, obscene, or which might permanently impair the development of young people.

##### A responsible advertisement policy

All advertising shall be conducted demonstrating a sense of responsibility towards the public.

The Label will indicate whether the particular game or site is under the control of an operator who cares about protecting young people.

The PEGI Online website [www.pegionline.eu](http://www.pegionline.eu) offers a wealth of information about the nature, categories and potential risks of online gaming. It contains useful tips for a safer online game play and offers the possibility to report complaints or abuses by consumers. Finally, companies can apply for membership in a dedicated professional section.

## What is online gaming and what are possible risks connected to the online gaming environment?

An online game is defined as a digital game that uses a live network connection in order to be played. This includes not only games played on the internet, but also those played online through consoles, across mobile phone networks or via peer-to-peer networks. Game styles and genres change rapidly so it is hard to be precise, but currently there are four main types.

**Browser games** are online versions of classic arcade, board or digital games. They are usually free and often available on websites and gaming portals supported by advertising.

**Advergaming** are designed to promote a particular product, company or political perspective.

**Network games** are usually played online with a PC, but increasingly players are using gaming consoles with internet access.

**Massively multiplayer games** differ from other online games in two ways: (1) the large number of concurrent players participating in a single game, and (2) the persistent nature of the games (i.e. play continues whether a particular gamer is participating or not).

Since online games often support virtual communities, players can be exposed to the risks associated with realtime interaction with unknown fellow players. Such risks include:

- Content being created as a result of the game which could be unsuitable for young people and a mismatch with the rating given for the game.
- Some players engaging in behaviour that might not be suitable for young people. For example, inappropriate or offensive language; bullying in games that allow text, voice or video communication; unsporting conduct like cheating and tampering; or aggressiveness towards others.
- Breaches of privacy. Online players sometimes encourage children to build relationships, share personal details, or even meet unknown fellow players outside the game.
- Links to websites where content may not be suitable for young people.

## PEGI Online recognised as innovative extension of PEGI system



Since it launched in 2007, PEGI Online has gained strong industry recognition. In 2008 it received Comenius-EduMedia's distinguished "Seal of Approval". Comenius-EduMedia awards are recognised as the most important German and European awards for ICT-based educational media (CD-ROMs, DVDs, internet portals, etc.). The awards

support outstanding didactic multimedia products in terms of pedagogy, content and design and are distributed by the Society for Pedagogy and Information SPI (Gesellschaft für Pädagogik und Information e.V. or GPI).



## Major video publishers sign up to PEGI Online

Currently, there are 21 PEGI Online member companies with an active license, while 12 applicants have signed the PEGI Online Agreement and are implementing the provisions of the PEGI Online Safety Code in order to activate their pending license. Another 50 companies are in discussion with the PEGI Online Administrator with the aim of qualifying for a PEGI Online license soon.

Among the signatories are the Council of Europe (CoE), who registered Wild Web Woods™, a videogame designed to help children – primarily within the 7 to 10 age range – learn the basic rules of internet safety. Against all Odds™, a free

videogame created by the Office of the United Nations High Commissioner for Refugees (UNHCR) also registered with PEGI Online. The game increases students' awareness and knowledge about the plight of the world's refugees. The PEGI Online logo provides assurance to parents that the content of popular games like these is suitable and safe, even for young children.

The goal is to proactively increase widespread pan-European participation in this effort **to guarantee that children playing online are not exposed to adult material or inappropriate behaviour.**

## Easy sign up and important benefits for new signatories

To encourage participation from publishers, a specific site, [www.joinpegionline.eu](http://www.joinpegionline.eu), is in place to facilitate an easy and efficient application process for the PEGI Online label. Once an application has been accepted, the PEGI Online Administrator verifies that the publisher's policies meet PEGI Safety Code requirements and issues a licence to use the PEGI Online logo.

The right to display the PEGI Online logo on their website and all other communication material is an extra incentive for publishers to become a PEGI Online Network member. The logo enhances a publisher's profile as a dedicated promoter of safe use of the internet for children. The hyperlinked PEGI Online logo also encourages visits to the publisher's website to learn about online gaming and identifies it as a recommended child-safe gaming site.

### GAMER PROFILE

**Name:** Frank    **Age:** 34  
**Profession:** Managing Director of IT Analyst/Developer firm  
**Favorite games:** Dawn of War series, Call of Duty series, Quake series  
**Platform(s):** Debian GNU/Linux, Ubuntu, Windows XP

I prefer RTS (real-time strategy) games, as they tend to be relaxing and intellectually challenging, especially when playing alone. But nothing beats fragging in a good first-person shooter during a LAN-party or when winding down with colleagues after a hard day's work.

Me or my friends organize around two LAN-parties each year, with approximately 10 people attending. We start in the evening and tend to go on until morning. Apart from that, I spend about three hours per week on RTS games. That is not as much as I'd like, but after spending the whole day in front of a computer, it's often better to do something else away from the screen (unfortunately). The first games I ever played date back to the eighties: Galaxy Invaders on the Atari 2600 game console and text-based MMO's (massive multiplayer online) on a Commodore 64 home computer.

I know about the PEGI rating, mainly from the game packaging. They are prominently featured on most game

websites as well. I'm not against it, but I am still doubtful whether there's really a need for it. Kids that might encounter offending material are still bombarded with similar content elsewhere (tv, movies, etc.). They could get around a rating system pretty quickly through friends, older acquaintances or parents that don't care about it. It is a guideline, and should be seen as such – nothing more.

As a parent, I would try to be more involved when deciding what content my kids would get to see, and assess it for myself where possible. I'd encourage them to discuss what they see, and relate it to other worldly matters they witness on a daily basis. The videogame industry can be fairly escapist, but it must remain grounded in reality: people should realize it often isn't a depiction of real life, but rather a created setting, optimised to be entertaining and interesting. Making people understand that you don't get bonus points if you tackle your boss, or that there are no respawns in real life is pretty important.





## ■ CHAPTER 4

### PEGI Communication tools and activities



## CHAPTER 4

### PEGI Communication tools and activities

#### Introduction

A crucial element of PEGI is a focused and consistent communications programme. The PEGI system is devised to inform and educate a rather large and diverse group of audiences. Parents and gamers are evidently prime targets, but next to that, it is important to reach out as well to teachers, shop owners and assistants, journalists, game developers and distributors, authorities and decision-makers, etc., in order to boost the general awareness of PEGI as the widely accepted rating system for video games.

A basic set of communication tools is developed centrally and improved continuously to maintain consistency throughout Europe. Country-specific actions build on this to approach particular audiences on a national level, often in conjunction with popular events and other local institutions.

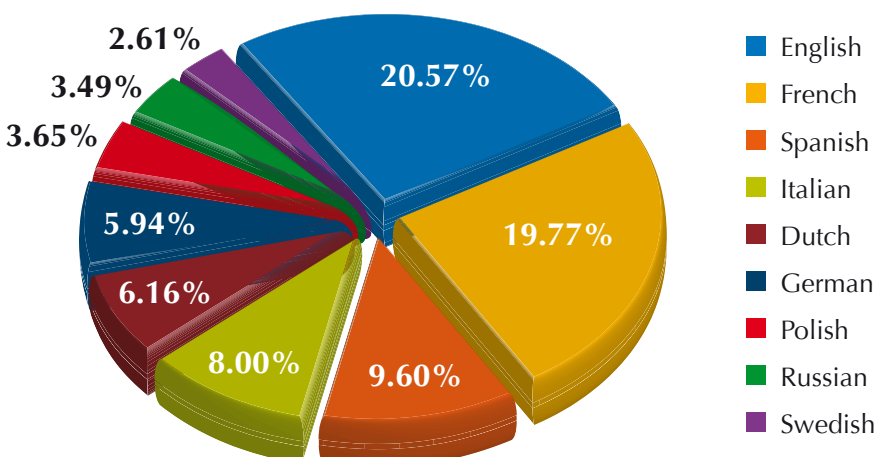
#### Website

The PEGI website [www.pegi.info](http://www.pegi.info) was given a complete update in order to provide even more comprehensive information to parents, caretaker and consumers alike in 23 languages. Straightforward explanations on the meaning of the labels and the functioning of the classification process were complemented with information on PEGI's administration, working committees, membership and rating statistics. In addition, website visitors now have the opportunity to learn more about the different game genres, the use of games in education and the games industry. Finally, the site also provides guidance and support for parents and caretakers with questions regarding gaming habits, parental control tools and the use of pirated games.

Some figures:

In the past year (1 July 2008 till 30 June 2009), [www.pegi.info](http://www.pegi.info) reached a steady, all-time high amount of visitors. The website received just over 3 million visitors, at an average rate of 8,260 visits per day, accumulating almost 6.3 million page views. Compared to the same period a year before, that is a growth of 9.35%. The time spent on the website is gradually increasing as well (the average now standing at 1 minute and 18 seconds) while the geographic spread of the visitors is clearly shown by the fact that the main languages of Europe each get a proportional share of the pageviews. (source: Google Analytics)

#### Website visits: languages



## Promotional materials

To inform about the new design of the age labels and content descriptors and to increase the visibility of PEGI at international events and towards specific audiences, a folder and a large poster were produced. The folder explains in concise but clear wording about the PEGI system and PEGI Online and is currently available in French and English.



## Activities per country

### Netherlands: 'Vitamin G – Gaming is good for you'



'Vitamin G' is the name of the Dutch campaign initiated by the Dutch trade association NVPI that focuses on a positive image of gaming and a better understanding of the benefits that PEGI has to offer. It promoted the message that gaming can have positive effects on someone's health and changes negative assumptions into positive thinking.



One of the objectives of the programme was to enhance awareness and knowledge among parents and caretakers, and because of that, PEGI plays a central role in the campaign. Vitamin G reached out to journalists, researchers and conference organizers with a view to increase its visibility in the media, among industry partners and directly towards consumers. In 2008, Vitamin G was part of the outdoor Free Gaming 2008 festival in Rotterdam as well as the NLGD Festival

of Games in Utrecht.

More information at <http://www.gamenisgoed.nl>

## Spain

The Spanish association aDeSe joined forces with the National Institute of Consumption to produce more than 30.000 brochures, for distribution to consumers in public places. Furthermore, aDeSe organized roundtables with representa-

tives of the most prominent Spanish websites to inform and motivate them about the relevance of signing up to PEGI ONLINE. To support these events, they developed a PEGI ONLINE dossier which was sent to all companies that are relevant to online digital content.

## Sweden: PEGI Ambassador of the Year

Boo is the name of a football team that was awarded the title of 'PEGI Ambassador of the Year' during last year's edition of Spelgalan, the Swedish games awards ceremony. PEGI is the main sponsor of this team of academy players, the second largest in Sweden with players aged 10 to 14. They promoted PEGI in a range of tournaments throughout the country and internationally.

Meanwhile, the game industry made sure that PEGI was advocated to pupils in schools and politicians. Well-coordinated cooperation with the Swedish Media Council ensured that schools were supplied with more than 5,000 copies of the information leaflet 'Tips till föräldrar om dataspel' (Tips about games to parents).

In January, a seminar on gaming was held in the Swedish parliament.

## Denmark: The PEGI Toolbox

The Danish Multimedia Association and the Media Council for Children and Young People created a PEGI Toolbox with information and examples to help understand the PEGI classifications and criteria. Approximately 100 youth center teachers and librarians from regions all over the country have been appointed as regional PEGI ambassadors to use this box and give presentations about computer games and the PEGI system.



In the meantime a big press event was held to present the PEGI Online system and to announce the launch of a new PEGI retail campaign in the major Danish retail shops. Store personnel wearing PEGI t-shirts distributed more than 40,000 leaflets. Famous Danish comedian Sebastian Dorset dressed up like the avatar Altair from the game Assassins Creed™ to do an 'infomercial' that was shown on national Danish TV for 3 weeks in the summer of 2008

(<http://www.youtube.com/watch?v=d2WUvYXT1n4>).



## Italy: Play safe, Trust PEGI!

AESVI launched the campaign *Videogame? Play safe, trust PEGI!* in partnership with key players in the Italian retail business, supported by the Italian Ministry of Youth. The campaign was targeted at the public opinion, in particular parents and educators and focused on the message that videogames are not an unruly way of entertainment, but that they should be bought and played based on an informed and responsible choice.

The campaign was launched in the Christmas period when sales of videogames and consoles are highest. AESVI produced and distributed different types of POS (point of sale) materials such as panels, posters, signs and got in touch with the most important videogames retailers, reaching more than 1,000 points of sales all over the country. Supported by the Ministry of Youth, the campaign was covered in the leading Italian newspapers (i.e. *Il Corriere della Sera*, *La Repubblica*, *Il Sole24Ore*, *La Stampa*, *il Tempo*) and in the free press (i.e. *City*, *Leggo*, *24 Minuti*).

AESVI also produced an informational leaflet that was distributed as an attachment to *IO DONNA* – the most popular Italian weekly magazine for women with a circulation of 700,000 copies. The campaign aimed to increase the awareness and knowledge about the PEGI System and PEGI Online, in particular among readers with children.

The campaign was later followed up by mailing a copy of the magazine with a letter of introduction by AESVI to 350 key representatives in Italian institutions (government and parliament), parent and consumer associations and third parties.



## Switzerland: E-Games

During its first edition, the E-games exposition in Bern attracted tens of thousands of visitors, eager to see the latest game releases. It was the ideal opportunity to educate children and their parents about the PEGI system. More than 1,500 people participated in a short contest about PEGI and received detailed explanations on the rating assessment, the

online search engine, age verification in game shops and the parental controls on game consoles. 16 and 18-rated games were shown in a dedicated area close to the PEGI booth, where age control was done by official security guards.

## Norway: E-Games



The Norwegian Association of Game publishers NSM, the Norwegian Awareness Node SAFT and the Media Authority Medietilsynet joined forces to launch a tongue-in-cheek PEGI campaign. For each of the PEGI age levels a funny game character was created to explain the various reasons why such a rating is given.

The campaign was launched during Gullstikka, the Norwegian Game Awards, and as a result, benefited from excellent media coverage. With the help of SAFT more than 80,000 leaflets, posters and stickers with the original game characters were distributed to Norwegian game retailers, multimedia stores and schools.



## Poland: PEGI at the Warsaw Science Picnic



With more than 100 000 visitors, the Science Picnic of Radio Bis on the New Town Square in Warsaw is the biggest open-air science happening in Europe. A large part of the visitors are parents and their kids. SPIDOR promoted PEGI with an information campaign entitled Play Safe!

Around 5,000 leaflets, 1,000 T shirts and 800 caps for adults and children were distributed at the event. A football team sponsored by PEGI won the local competition. The event was covered live on Radio Bis, including interviews and comprehensive information on the functioning and the importance of the PEGI system.



## GAMER PROFILE

**Name:** Henk Vervaeke

**Age:** 52

**Profession:** Communications Consultant

**Favorite games:** Call of Duty, Wii Sports

**Platform(s):** PC, Wii

I remember playing early video games on the Sinclair Spectrum ZX, 'Depth Charge' on my Apple IIe and 'Castle Wolfenstein' – the era of the big floppy disk. These days, I mostly play Call of Duty, on average once a month for about an hour. I'm not an online gamer because the pace is too high for me. I play the Wii more often, once a week or so, when friends and family come over.

I think I know the PEGI rating from PC gaming magazines. The rating doesn't really affect a gamer of my age. But I can understand that it gives the community a tool to check the content of games. And any method of counsel is valuable, as long as it is properly communicated to the community at large (storeowners, media, etc.) I am unsure whether it's always the parents who buy the games for their kids. The kids' buying behaviour often depends on what their peers are playing. A rating system can only prove its worth if parents do pay attention to what their offspring is playing, from what age and for how long.

**Name:** Simon Vervaeke

**Age:** 19

**Profession:** College Student

**Favorite games:** World of Warcraft, Final Fantasy, Call of Duty and the forthcoming Star Wars: The Old Republic

**Platform(s):** PC

I started playing at the age of seven, when my parents bought me a Playstation for Christmas. Today I mostly play MMORPG's on the internet. I play when I feel like playing, I have no schedule – I guess it'll be around two hours per week. I am familiar with the PEGI rating through experience and via magazines. It seems a little overrated to me, but that only applies to myself, not in general. As a parent I would take it in mind since the PEGI rating goes hand in hand with a child's development. For that reason, the PEGI rating can be useful for a lot of children.



 ANNEXES



## ANNEX 1

### PEGI Code of Conduct

#### CODE OF CONDUCT FOR THE EUROPEAN INTERACTIVE SOFTWARE INDUSTRY REGARDING AGE RATING LABELLING, PROMOTION AND ADVERTISING OF INTERACTIVE SOFTWARE PRODUCTS

##### Article 1: SCOPE

**1.1** The present Code shall apply to all interactive software products including videogames, computer games and education/reference works on CD Roms, distributed for retail sale by the members of the Interactive Software Federation of Europe (ISFE), or any other signatory or trade association which, without being members of this association, decide to comply with this Code ('the Signatories').

**1.2** This Code covers all products distributed electronically by whatever means, such as via the Internet, including on-line retailing of packaged products and on-line distribution, as far as these activities are initiated in the European Economic Area territories, and in Switzerland, within the control of the Signatories.

**1.3** The rules contained in this Code shall apply to the labelling of interactive software products, as well as to associated advertising and promotion by any means.

##### Article 2: PURPOSE

This Code reflects the interactive software industry's commitment and concern to provide information to the public on the content of interactive software products in a responsible manner. This industry's contribution complements existing national laws, regulations and enforcement mechanisms.

**2.1** Firstly, this Code is intended to provide parents and educators with objective, intelligible and reliable information regarding the age category for which a given product is deemed suitable with specific reference to its content. The voluntary ratings implemented under the Code in no way relate to the difficulty of a game or the level of skill required to play a game.

**2.2** Secondly, this Code is intended to ensure that all advertising, marketing and promotion of interactive software products is conducted in a responsible manner.

**2.3** Thirdly, this Code reflects the interactive software industry's commitment not to distribute market, advertise or promote interactive software products likely to offend human decency.

##### Article 3: INSTRUMENTS

In order to fulfil the objectives spelled out in Article 2, nine principal instruments are hereby outlined:

**3.1** An **Age Rating System**; the Pan European Game Information System ('PEGI System'), operated by PEGI S.A. (see **3.3** below) with the assistance of an administrator, (the 'PEGI

administrator') resulting in the granting of licenses to use a specific PEGI label ('the Logo') which will indicate the age category most suitable for a product by reference to its content, as well as descriptors ('the Descriptors') giving reasons for allocation of this age category. PEGI retains at all times the right to rescind or recall any age rating or descriptor assigned to a product.

**3.2** An **Online Safety Code** to be known as the 'PEGI Online Safety Code' which shall apply to online game providers.

**3.3** **PEGI S.A.** ('PEGI') a Belgian not for profit company with a social purpose and entrusted by ISFE with the day to day management, supervision and development of the PEGI System and Online Safety Code.

**3.4** A **Management Board** ('PMB') consisting of a chairperson, the PEGI Managing Director, representatives from industry, the chairpersons of the PEGI Council and the Experts Group charged with giving guidance to the PEGI Managing Director on the operation and development of the PEGI system.

**3.5.** A **Council** ('PC') and **Experts Group** ('PEG') including representatives from chief stakeholders (parents, consumers associations, child psychology experts, academics, media experts and the interactive software industry - see Article **10** below) These bodies will advise on the continuing adjustment of the Code to take account of social, political, legal and technological developments. The PEG shall be in charge of considering technical developments (in all fields) that may impact the PEGI system.

**3.6** A **Complaints Board** ('PCB') including, in the same manner as the PC, representatives from chief stakeholders, (see **Article 11 below**) and entrusted with the two following tasks:

- handling possible complaints about the consistency of advertising, marketing and promotional activities of any company subscribing to this Code with the age rating finally attributed or likely to be attributed under the PEGI System (see below).
- handling conflicts about the PEGI System age ratings themselves including any signatory or consumer complaints about those ratings.

**3.7.** An **Enforcement Committee** ('PEC') including, in the same manner as the PC, representatives from chief stakeholders which is in charge of implementing the recommendations of that Board, and, more generally, of seeing to the enforcement of the rules and sanctions included in the present Code,

including decisions of the Complaints Board (see Article 12 below).

**3.8 A Legal Committee**, ('PLC') in charge of securing the ongoing coherence of the system with national legal frameworks.

#### Article 4: ISFE'S COMMITMENT TO THE CODE

PEGI hereby commits to:

**4.1** ensure that the PEGI System is operated as efficiently as possible by an independent administrator.

**4.2** ensure comprehensive, thorough awareness and understanding of the Code and its purpose by all participants in the industry, including Signatories and developers, wholesalers, retailers, trade media and advertising companies.

**4.3** implement and maintain the appropriate structures to carry out the tasks of interpreting and updating this Code, making it public in cooperation with its member national trade associations, settling disputes, and conducting studies and reports about the products concerned.

**4.4** initiate any additional operations necessary to support the purposes of the Code.

#### Article 5: OBLIGATIONS OF SIGNATORIES

Signatories of the Code shall:

**5.1** abide by all decisions made by the PCB and PEC and provide all appropriate information to the PC and PEG which oversees the implementation of this Code.

**5.2** assist PEGI in delivering on its own commitments as stated in Article 4 above including endorsing and publicising the Code where necessary.

#### Article 6: LEGAL AND REGULATORY ENVIRONMENT

Signatories shall ensure that the content, distribution by any means, promotion and advertising of the products covered by this Code comply at all times with existing and future laws and regulations at EU and Member State level. It is therefore understood that the obligation to utilise the Code applies only as far as it does not lead to any infringement of existing or future national mandatory (governmental) rating and labelling systems applicable to interactive software and related websites.

#### Article 7: AGE RATING

The main features of the PEGI System are described as follows. Their implementation shall be subject to guidelines to be enacted by the Enforcement Committee and to specific agreements to be entered into by the Signatories and PEGI.

**7.1** Prior to product release, Signatories shall, for each product and format and language version thereof complete an Assessment File, being all the necessary documents, age rating declaration form, software, tools, manuals or other materials needed to process the Application to use the PEGI system and which will help assess the content of the product using the following criteria: violence, sex, discrimination, drugs, fear, gambling, online play and bad language.

**7.2** The Assessment File shall generate an age rating together with content descriptors indicating the reasons for classification of the Product in a specific age category.

**7.3** The PEGI System age rating groups shall be divided as follows: 3, 7, 12, 16, and 18.

**7.4** The PEGI Administrator shall review the Assessment File according to the following rules:

**7.4.1** The PEGI Administrator shall review all products in full before deciding whether to approve the age rating by granting a licence to use the logo and descriptors.

**7.4.2** In the event that the recommendation on the appropriate age rating is different from the one determined by the submitting signatory, an explanation for the variation shall be provided by the PEGI administrator. If the signatory does not agree with the recommendation, it may appeal to the PCB, which will make the final decision as to the appropriate age rating recommendation.

**7.4.3** In due course, the signatory will receive a license to reproduce the logo and descriptors corresponding to the final recommendation on the product packaging, or equivalent place immediately visible to consumers where distribution is made via electronic means.

#### Online Play

**7.4.4** Signatories who publish online games which allow voice or video chat should take reasonable safeguards to protect children from access to age-inappropriate content introduced by other users and should also take steps to ensure that the privacy of minors is reasonably protected at all times.

#### Article 8: LABELLING

**8.1** The logo and descriptors shall appear on the outer packaging of the product in a size that permits the message to be perfectly legible and that is clearly visible to the consumer at the point of sale, in accordance with the templates determined by PEGI for each format.

**8.2** The same principles shall apply to the making available to the public through other means apart from sale, such as rental or lending.

**8.3** Signatories shall ensure that the logo and descriptors and the online icon are used in accordance with national legal requirements and that, in particular, they are not used in countries where the product is prohibited or subject to compulsory content classification.

**8.4** Signatories should use their best efforts to encourage website providers carrying those Signatories' games, or advertising for those games, but not under the Signatories' control to display the ratings for those games on the websites.

## Article 9: ADVERTISING AND PROMOTION

**9.1** Advertising materials shall, wherever practicable, show the age rating granted to the product concerned or, should the license be pending, show the final age rating expected, taking the higher age category as a reference in case of doubt.

**9.2** The design of print, broadcast and on-line advertising of these products shall comply with laws and regulations applicable to the age category concerned.

**9.3** More generally, the following principles shall apply:

- i. All advertisements shall accurately reflect, to the best extent possible both the nature and content of the product publicized and the rating associated with that product. Advertisements should not mislead consumers as to the product's true character.
- ii. Advertisements shall not in any way exploit a PEGI System rating of a product as such rating is intended as a recommendation only.
- iii. All advertisements shall be created with a sense of responsibility towards the public.
- iv. All advertisements shall aim to avoid content that is likely to cause serious or widespread offence to the average consumer targeted.
- v. Signatories shall not specifically target advertising for entertainment software products rated 16 or 18 to consumers for whom the product is not rated as appropriate.
- vi. Signatories shall ensure that ancillary or separate products that are being sold or promoted in association with a core product contain content that is appropriate for the audience for which the core product is intended.
- vii. Signatories shall not enter into promotion of interactive software products rated 16 or 18 with another company's brands, products, or events, if it is reasonable to believe that such company's products, brands or events will reach consumers for whom the interactive software product is not rated as appropriate.

viii. Signatories shall inform the public by means of a general statement of the existence of sponsorship(s) and/or the existence of 'product placement(s) associated with any product. In this regard use of a trade mark or brand solely to provide authenticity to the game environment shall not be held to constitute either product placement or sponsorship provided that license holders do not receive payment in exchange for such use.

**9.4** The PEGI System shall be open to magazine Signatories for the age rating of compact discs and/or DVDs attached to such magazines (cover discs) when they contain excerpts from interactive software products and/or audiovisual material related to such products provided that those products are published by companies which abide by this Code.

## Article 10: COUNCIL ('PC') AND EXPERTS GROUP ('PEG')

The PEGI Council ('PC') and PEGI Experts Group ('PEG') shall play key roles in ensuring that the Code evolves in line with all relevant social, political, legal and technological developments.

The PC comprises:

- national representatives from the countries that use the PEGI system.
- representatives from PEGI and the PEGI Administrator.
- other members as deemed appropriate by agreement between the PMB and the PC.

The PEG comprises:

- parents and consumer organisation representatives,
- child psychology experts,
- media experts,
- age rating experts,
- lawyers expert in European minor protection laws,
- videogame industry experts,
- academics,
- other experts in their field as considered appropriate and necessary.

## Article 11: COMPLAINTS BOARD ('PCB')

An independent Complaints Board is established with regard to this Code of Conduct with the following tasks in mind:

- handling possible complaints about the consistency of advertising, marketing and promotional activities of any company participating to this Code with the age rating finally attributed or likely to be attributed under the PEGI System;
- handling possible rating conflicts between Signatories and the PEGI System,
- processing age rating complaints by consumers.

The PCB will draw on similar expertise to the PC and PEG.

**Article 12: ENFORCEMENT COMMITTEE ('PEC')**

Compliance with this Code, the provision of advice to all companies deciding to subscribe to the Code as well as to its administrator and the possible imposition of sanctions on companies infringing the Code, shall be entrusted to the PEC which shall be made up of an equal number of carefully selected representatives of the industry and PC members, as nominated by the PMB.

**Article 13: INFRINGEMENT, CORRECTIVE ACTION, SANCTIONS AND ARBITRATION**

**13.1** In addition to infringements identified by third parties or the Administrator, the PEC and the PCB shall jointly identify and document any possible wrongful application and/or breaches of the Code. Reasonable, non-arbitrary discretion will be used in examining all relevant facts to enable a determination of appropriate sanctions.

**13.2** The PEC and PCB may suggest corrective action commensurate to the violation, to be implemented immediately. This corrective action may include:

- re-labelling of packaging,
- revocation and removal of logo, age rating and descriptors,
- recall of product inaccurately labelled
- modification of advertisements both on and offline

**13.3** Failure to abide by the terms of this Code, including the failure to institute the corrective action referred to at **13.2** above will expose offenders to the imposition of sanctions by the PEC as set out in Annex 2 including, but not limited to, the following:

- temporary suspension of product from the PEGI System
- mandatory modification of any associated advertisements both on and off-line,
- disqualification of product from the PEGI System for a set period
- fines of up to € 500,000 per violation depending on the gravity thereof and the failure to take appropriate remedial action.

**13.4** Violations warranting these sanctions include:

- presenting misleading or incomplete material to support the original application for a PEGI rating license,
- failure to submit changes, updates, or modifications that affect the ability of the signatory to comply with its obligations under the Code in a timely fashion,
- self-application or flawed display of logos, age ratings or descriptors the POL by the license holder,
- inappropriately targeted marketing,
- more generally, all steps or omissions that fail to show a sense of responsibility towards the general public. In this regard the deliberate failure by a signatory to disclose relevant content which is discovered after an age rating and content descriptors have been assigned shall be material grounds for consideration of high level sanctions by the PEC.
- those steps and omissions set out in Annex A.

**13.5** The PEC shall be able to take into account on the application of a signatory, or otherwise, any or all extenuating circumstances justifying moderation of any sanction to be applied.

**13.6** Any PEC decision imposing a sanction on a signatory can be referred by that signatory, within thirty days of the date of the PEC decision, to final and binding arbitration by CEPANI, the Belgian Centre for Arbitration. Arbitration shall be the sole method available to challenge any decision of the PEC. Imposition of any sanction shall await the decision of CEPANI.

## ANNEX 2

### PEGI Online Safety Code (POSC)

#### Article 1: SCOPE

The PEGI Online Safety Code, hereinafter referred to as 'The POSC', shall apply to all online gameplay providers who decide to become signatories of the POSC. The term 'online gameplay providers' refers to all publishers or website operators to the extent they provide online gameplay services through which interactive software products allowing on-line gameplay (including: videogames, computer games, and education/reference works on CD Roms) are made available or enjoyed.

The POSC shall also apply to all associated advertising and promotion of such online gameplay services (see Article 10 below).

#### Article 2: PURPOSE

The POSC is based on a Code of Conduct which was introduced under the PEGI\* system which applies to all interactive software including videogames played online. The POSC therefore also reflects the interactive software industry's commitment and concern that information is provided to the public in a responsible manner about the content of interactive software products. The industry's contribution is intended to complement existing national laws, regulations and enforcement mechanisms.

Firstly, the POSC is intended to provide parents and educators with an assurance that online gameplay services displaying the PEGI Online Logo are operated by publishers and other companies who have signed up to the POSC and therefore committed to abide by its provisions.

Secondly, the POSC is intended to ensure that all advertising, marketing and promotion of online gameplay services is consistent with the industry's fundamental aim of informing the public, especially parents, of the content of interactive software products.

Thirdly, the POSC reflects the interactive software industry's commitment not to produce, advertise, distribute or promote any product in breach of human decency.

#### Article 3: INSTRUMENTS

In order to fulfil the objectives spelled out in Article 2, eight principal instruments are hereby outlined eight of which are common to the POSC and the PEGI Codes and so maintain the consistency of both systems. These instruments are:

**3.1 PEGI S.A.** ('PEGI') a Belgian not for profit company with a social purpose and entrusted by ISFE with the day to day management, supervision and development of the POSC.

**3.2 A Management Board** ('PMB') consisting of a chairperson, the PEGI Managing Director, representatives from industry, the chairs of the of the PEGI Council and the PEGI Experts Group charged with giving guidance to the PEGI Managing Director on the operation and development of the PEGI system.

**3.3. A Council** ('PC') and **Experts Group** ('PEG') including representatives from chief stakeholders (parents, consumers associations, child psychology experts, academics, media experts and the interactive software industry. These bodies will advise on the continuing adjustment of the Code to take account of social, political, legal and technological developments.

**3.4 A Complaints Board** ('PCB') including, in the same manner as the Council, and Experts Group representatives from chief stakeholders and entrusted with management of the following three tasks:

- conflicts between applicants and the independent PEGI Online Administrator, hereinafter 'the PO Administrator' (see E. below).
- complaints about the consistency of advertising, marketing and promotional activities of any POSC signatory with the provisions of the POSC.
- disputes about the implementation of POSC by POSC signatories. [consistent with the preceding paragraph above and also Article 6 below.]

**3.5 An Enforcement Committee** ('PEC') including, in the same manner as the Council and Experts Group, representatives from chief stakeholders which is in charge of implementing their recommendations and, more generally, of ensuring the enforcement of the provisions of the POSC, including decisions of the PCB.

**3.6 A Legal Committee** ('PLC') which will ensure the ongoing coherence and consistency of the POSC Licensing System (see 3.7) with national legal frameworks.

**3.7 A Licensing System** operated by an PEGI with the assistance of the PO Administrator, for issue of licenses to use the PEGI Online Logo, whereby an assurance is given to the public that the licensee has committed to abide by all provisions of the POSC.

#### Article 4: PEGI'S COMMITMENT TO THE POSC

PEGI hereby commits to:

- a/** ensure that the PEGI Online system is operated as efficiently as possible by the PO Administrator.
- b/** ensure, in cooperation with national trade associations comprehensive, thorough awareness and understanding of the POSC and its purposes by all participants in the interactive software industry, including publishers, developers, website operators, wholesalers, retail, trade media and advertising companies, also by European policy makers and by the European public.
- c/** implement and maintain the structures necessary to interpret, operate, publicise and update the POSC, whilst also conducting studies and reports on its ongoing application to interactive software.



**d/** initiate any additional activity necessary to support the POSC.

#### **Article 5: OBLIGATIONS OF POSC SIGNATORIES**

POSC signatories shall:

**a/** abide by the POSC in respect of the labelling of online gameplay services under their control and also with respect to all related advertising and promotional activities. (see Article 10 below).

**b/** abide by all decisions made by the PCB and PEC and provide all appropriate information to the PAB as it oversees the implementation of the POSC.

**c/** assist PEGI in delivering on its own commitments as provided in Article 4 above including endorsing and publicising the POSC as appropriate.

#### **Article 6: LEGAL AND REGULATORY ENVIRONMENT**

POSC signatories shall ensure that online services comply with existing and future laws and regulations at EU and national level. It is therefore also understood that the obligation to label online gameplay services according to the POSC applies only as far as it does not lead to any infringement of existing or future national mandatory (governmental) rating and labelling systems applicable to interactive software and online gameplay services.

#### **Article 7: AGE RATING AND LABELLING**

The main features of the POSC are described hereunder. Their implementation shall be subject to contracts to be signed by PEGI with all potential signatories of the POSC, and to guidelines enacted by the PEC.

**7.1** applicants to the POSC shall file an online application to use the PEGI Online Logo which shall be assessed by the Administrator of PEGI Online (hereinafter 'the PO Administrator')

**7.2** the Assessment will address the main concerns raised by parents and educators concerning online game play, namely;

**7.2.1** the online gameplay service operated by the applicant will only include game content which has been appropriately rated i.e. under the regular PEGI rating system or under other recognized European systems such as – but not limited to - those operated by the BBFC in the UK and the USK in Germany.

This provision will not apply to game content which is posted on the online gameplay service operated by the applicant but which is not under the applicant's control, such as user generated content.

**7.2.2** the PEGI Online Logo will provide a direct hyperlink to a dedicated website where appropriate information will

be given regarding the risks arising from the fact that content created in the course of gameplay may be unknown to the original publisher. Alternatively and where appropriate, POSC signatories shall display the url associated with the said dedicated website in a prominent position visible to users of online gameplay services.

#### **Article 8: LICENSING AND LABELLING PROCEDURES**

**8.1** the PO Administrator shall evaluate the ability of the applicant to comply with the commitments of the POSC, in light of answers and material provided by the applicant, including possible codes of conduct already enforced by the applicant as far as online gameplay services are concerned and the other factors as set out at Article 9 below.

**8.2** If the applicant does not agree with the evaluation of the PO Administrator, it may appeal to the PCB, which will then make a final decision as to the applicant's eligibility to participate in the POSC.

**8.3** If an application is successful, the applicant will be granted by the PO Administrator, on behalf of ISFE, a licence to reproduce the PEGI Online Logo and to post it on its online gameplay services. This authorisation will be granted for one year and may be renewable for a longer term depending on the PO Administrator's subsequent recommendation.

**8.4** The PEGI Online Logo shall be displayed in a size that permits the message to be clearly visible to, and perfectly legible by, the public, in accordance with templates to be provided by PEGI. The same principles will apply to any making available of interactive software to the public through other means apart from sale, such as rental or loan.

**8.5** Signatory shall ensure that the PEGI Online Logo is used only in accordance with national legal requirements and that, in particular, it is not used in countries where the products carried on the online gameplay services concerned are prohibited or subject to compulsory legal classification. Should products available on online gameplay services carrying the PEGI Online Logo be subject to such classification in any country or countries, the use of the PEGI Online Logo shall be accompanied by a conspicuous reference to any consequent conditions covering gameplay on the said services.

#### **Article 9: KEY PROVISIONS**

**9.1** Content; Signatories shall use their best endeavours to ensure that online gameplay services under their control are kept free of content which is illegal, offensive, racist, degrading, corrupting, threatening, obscene or might permanently impair the development of minors. When online gameplay services under the control of signatories also contain user generated content, the license holders shall use their best

endeavours to immediately take down user generated content which is illegal, offensive, racist, degrading, corrupting, threatening, or obscene.

Observance of all the foregoing should, where possible, also include removal of undesirable links or 'hyperlinks.'

**9.2** Appropriate Reporting Mechanisms; Consistent with the foregoing paragraph, signatories will ensure that appropriate reporting mechanisms are in place to allow players notify signatories of the existence of content such as described in the previous sub-section on any websites under their control which offers online gameplay services

**9.3** Chatrooms; Signatories should take reasonable precautions to ensure that online gameplay services under their control, and which allow voice or video chat, protect children from access to age-inappropriate content introduced by other users.

**9.4** Other Operators; Signatories shall use their best endeavours to ensure that operators of online gameplay services utilising game content published by the signatory and which are authorised by, but not under the control of, the signatory, abide by the POSC rules and/or subsequently become signatories of the POSC themselves.

**9.5** Safety Warnings; POSC signatories shall advise users of online gameplay services of the desirability of taking occasional breaks from gameplay.

**9.6** Community Standards; POSC signatories shall ensure the incorporation in their terms of business with online subscribers of certain provisions usually included under the heading of so called 'community standards'. These provisions will contain prohibitions against those subscribers introducing content or indulging in online behaviour which is illegal, offensive, racist, degrading, corrupting, threatening, obscene or might permanently impair the development of minors

**9.7** Privacy; Any POSC signatory engaging in the online collection of personal information from subscribers will maintain an effective and coherent Privacy Policy fully in accordance with all applicable European Union and national Data Protection laws.

The Privacy Policy will encompass the responsible collection, distribution, correction, and security of the personal details of subscribers who shall be given full details of the POSC signatory's Privacy Policy before the finalisation of any subscription to an online gameplay service. Subscribers must be also be given the opportunity to comment on any perceived misuse of their personal details and therefore be fully advised as to ways, for example, of avoiding unsolicited or unwanted e-mail contact.

**9.8** Protection of Minors ; In keeping with one of the main objectives of the POSC, signatories shall adhere to stringent standards ensuring the protection of children from any unsuitable content and behaviour associated with any online

gameplay services aimed at children. These standards shall include, as appropriate;

- the publication of warnings about the supply or display online of private email addresses
- promoting responsible purchasing practices where minors are concerned.

## Article 10: ADVERTISING AND PROMOTION

**10.1** The design of print, broadcast and on-line advertising of PO labelled websites operated by signatories shall comply with all applicable laws and regulations.

**10.2** More generally, the following principles will apply to the relationship between PO labelled websites and the rated products they might carry:

- all advertisements must accurately reflect the nature and content of the product represented and wherever reasonably practicable the rating issued (i.e. an advertisement should not mislead consumers as to the product's true character).
- all advertisements shall be created with a sense of responsibility towards the public.
- no advertisement shall contain any content that is likely to cause serious or widespread offence to the average consumer targeted.
- signatories shall not specifically target advertising for entertainment software products rated 16 or 18 to consumers for whom the product is not rated as appropriate.
- signatories shall ensure that ancillary or separate products that are being sold or promoted in association with a core product contain content that is appropriate for the audience for which the core product is intended.
- signatories shall inform the public by means of a general statement of the existence of sponsorship(s) and/or the existence of 'product placement(s) associated with any online service. In this regard use of a trade mark or brand solely to provide authenticity to the game environment shall not be held to constitute either product placement or sponsorship provided that signatory do not receive payment in exchange for such use.
- signatories shall not enter into promotion of online interactive software products rated 16 or 18 with another company's brands, products, or events, if it is reasonable to believe that such company's products, brands or events will reach consumers for whom the interactive software product is not rated as appropriate.

## Article 11: PEGI COUNCIL AND EXPERTS GROUP

The PEGI Council (PC), Legal Committee (PLC) and Experts Group (PEG) will play key roles in ensuring that the POSC

evolves in line with all relevant social, political, legal and technological developments. The PC, PLC and PEG will interpret the provisions of the POSC and suggest appropriate implementation tools.

The PC comprises:

- national representatives from the countries that use the PEGI system,
- representatives from PEGI and the PEGI Administrator,
- other members as deemed appropriate by agreement between the PMB and the PC.

The PEG comprises:

- parents and consumer organisation representatives,
- child psychology experts,
- media experts,
- age rating experts
- lawyers expert in European minor protection laws,
- videogame industry experts,
- academics,
- other experts in their field as considered appropriate and necessary.

The PLC comprises experts appointed in consideration of their skills, experience and daily role in dealing with legal issues as they apply to the videogame industry.

#### Article 12: COMPLAINTS BOARD

The PEGI Complaints Board (PCB) will:

- handle possible complaints about the consistency of advertising, marketing and promotional activities of a signatory with the provisions of the POSC.
- handle possible conflicts about the way the POSC is implemented by a signatory

The PCB will draw on similar skills as the PC and PEG, as reflected by its current composition (see Article 3.3 and 3.4 above).

#### Article 13: ENFORCEMENT COMMITTEE

Compliance with the POSC, the provision of advice to all companies deciding to subscribe to the POSC as well as to its Administrator, and the imposition of sanctions on companies infringing the POSC, shall be entrusted to the PEGI Enforcement Committee ('PEC') which shall be made up an equal number of carefully selected representatives of the industry, PC and PEG members, as nominated by the PMB.

#### Article 14: INFRINGEMENT, CORRECTIVE ACTION, SANCTIONS AND ARBITRATION

**14.1.** In addition to infringements identified by third parties or the PO Administrator, the PEC and the PCB shall jointly

identify and document any possible wrongful application and/or breaches of the POSC. Reasonable, non-arbitrary discretion will be used in examining all relevant facts to enable a determination of appropriate sanctions. The PEC and PCB will also suggest corrective steps commensurate to the violation, to be implemented immediately.

**14.2.** Failure to abide by the terms of the POSC, will expose offenders to the imposition of sanctions by the PEC as set out in Annex A including, but not limited to, the following:

- temporary removal of the POL licence from a signatory,
- mandatory modification of any associated advertisements both on and off-line,
- removal of the right to use the PEGI Online Logo for a specified period of time
- removal of the PEGI Online Logo from any online gameplay service associated with a breach of the POSC
- fines of up to € 500,000 per violation depending on the gravity thereof and the failure to take appropriate remedial action.

**14.3** Violations covered by these sanctions include:

- presenting misleading or incomplete material to support the original application for a PEGI Online license,
- failure to submit changes, updates, or modifications that affect the ability of the publisher to comply with its obligations under the POSC in a timely fashion,
- self-application or flawed display of logos, age ratings or descriptors or the PEGI Online Logo by the signatory,
- inappropriately targeted marketing, and, more generally,
- all steps or omissions that fail to show a sense of responsibility towards the general public

and those steps and omissions set out in Annex A.

**14.4.** Any sanction imposed on a signatory under the POSC can be referred by that signatory, within thirty days of the date of imposition of the sanction, to final and binding arbitration by CEPANI, the Belgian Centre for Arbitration. All costs of the arbitration will be met by the signatory.

**14.5** Any PEC decision imposing a sanction on a signatory can be referred by that signatory, within thirty days of the date of the PEC decision, to final and binding arbitration by CEPANI, the Belgian Centre for Arbitration. Arbitration shall be the sole method available to challenge any decision of the PEC. Imposition of any sanction shall await the decision of CEPANI.

## Breaches of PEGI and PEGI Online Safety Codes and related sanctions

### LEVEL I. VERY SERIOUS

#### Failure to Disclose Significant Content

This can be defined as a deliberate failure to disclose, or gross negligence\* leading to a failure to disclose, significant aspects of a game which would have led to the assignment of a higher age rating to that game than the rating actually assigned to and displayed on the game under the PEGI rating process and the targeting of advertising for a game at consumers, especially children, for whom the product is not rated as appropriate.

The fact that this behaviour causes significant damage both to the integrity of the PEGI system and the public's use of or trust in the system is reflected in the sanctions set out below.

### SANCTIONS

**First Breach; 100,000 to 250,000 Euro Fine**

**Second Breach; 250,000 to 500,000 Euro Fine**

**Third Breach; 500,000 Euro Fine**

Additionally, A period of disqualification from the PEGI Rating System may also be imposed the duration of which will depend on the severity of the breach

In all the above cases the PEC may also elect to impose sanctions including the removal of the game from the market in order to resticker all existing product in line with the appropriate age rating.

\* In case of doubt 'gross negligence' will be not be held to have taken place;

- (i) where a genuine mistake has been made by the person assessing the content of a game and/or
- (ii) where there was a subsequent genuine attempt made by that person to correct the assessment as soon as possible after becoming aware of the mistake

### LEVEL II. SERIOUS

These include the following:

- Negligence leading to a failure to disclose significant aspects of a game which would have lead to the assignment of a higher age rating to that game than the rating actually displayed on the game when sold to the public. 'Negligence' will be held to exist where the content has been assessed but, through error or omission, content significant to the rating assigned has not been taken into account.
- Failure to comply with a Sanction imposed by the PEC
- Failure to respond to an Inquiry by the PEGI Administrator or the PEC

- Failure to submit changes, updates, or modifications that materially concern the age rating assigned to a game and are made after the product has received that rating.
- Using PEGI logo or content descriptors which have not been assigned by the PEGI Administrator by way of licence.
- Failure to Display a PEGI age rating or display of an incorrect PEGI rating
- Failure to display a PEGI content descriptor or the display of incorrect content descriptor
- Using Advertising which is inconsistent with a PEGI Rating (not 'very' serious) or which exploits a PEGI rating by, for example, drawing attention to an 18 rating as a device to encourage sales of the game concerned..
- Using Advertising which is offensive or which otherwise does not reflect a sense of responsibility towards the public or to the PEGI rating system.

### SANCTIONS

**First Breach; 5,000 to 20,000 Euro Fine**

**Second Breach; 20,000 to 50,000 Euro Fine**

**Third Breach; 75,000 Euro Fine**

In all the above cases the PEC may also elect to impose sanctions either of removal of the game from the market or restickering of all existing product in line with the appropriate age rating.

### LEVEL III ADMINISTRATIVE/OPERATIONAL

Failure to display correct PEGI Rating on Demo or Trailer

Wilful failure to submit complete and accurate submission materials, when discovered before release of the product.

Negligent supply of incomplete, inaccurate or inconsistent content in submission materials leading to rating errors which are discovered before release of the product.

### SANCTIONS

**First Breach; up to 5,000 Euro Fine**

**Second Breach; 5,000 to 7,500 Euro Fine.**

**Third Breach; 10,000 Euro Fine and/or a period of disqualification from the PEGI Rating System depending on the severity of the breach**

### ALL LEVELS - RETRAINING OF CODERS

In all levels and cases of breaches of the PEGI and PEGI Online Safety Codes the imposition of a sanction requiring the retraining by the PEGI Administrator of all PEGI Coders employed by that company shall be at the discretion of the PEC.

### ALL LEVELS - BREACHES AND TIME LIMITS

In the case of sanctions to be applied the following Time Limits shall be held relevant in determining whether a company under sanction shall be considered by the PEC to be of past good conduct;

**LEVEL I** All breaches shall stay on a company's PEGI record for a period of three years from the date that the related sanctions were imposed

**LEVEL II** All breaches shall stay on a company's PEGI record for a period of two years from the date that the related sanctions were imposed

**LEVEL III** All breaches shall stay on a company's PEGI record for a period of one year from the date that the related sanctions were imposed

After the expiration of the appropriate time limits as set out above the PEGI record of the offending company shall be considered free of any breach of the PEGI and PEGI Online Safety Codes. However the PEC when considering sanctions for a breach at any one Level shall be entitled to take into account other breaches at all other Levels and can impose any discretionary penalties available under the Code for breaches at the Level under consideration.

### ALL LEVELS - PUBLICATION OF DECISIONS

The PEC reserves the right to publicise details of all and any sanctions imposed for breaches of the PEGI and PEGI Online Safety Codes.



## ANNEX 3 : PEGI Signatories

Publisher Company	country
10tacle Studios AG	Germany
1bit garden Ltd	United Kingdom
1C Publishing EU sro	Czech Republic
2D BOY	USA
46 TO SHINJUKU MEDIALAB, SL.	Spain
505 Games Srl	Italy
Abstraction Games	The Netherlands
Abylight S.L.	Spain
Activision UK Ltd	United Kingdom
Adventure's Planet SRL	Italy
Agetec Europe, Ltd	USA
AIM Productions n.v.	Belgium
Aksys Games	USA
Alten8 Ltd	United Kingdom
ANKAMA GAMES	France
Anozor SARL	France
Anuman-Interactive SA	France
Aqua Pacific Ltd	United Kingdom
Arc System Works Co.,Ltd	Japan
Artplant AS	Norway
Ascaron Entertainment GmbH	Germany
Aspyr Media Europe	United Kingdom
Astragon Software GmbH	Germany
Asylum Entertainment	UK
Atari	France
Atari UK Ltd	United Kingdom
Ateam Inc	Japan
Atlus U.S.A., Inc.	USA
Avanquest Iberica	Spain
Avanquest Software Publishing Ltd	UK
B2B Games	France
Backbone Entertainment	USA
Barnstorm Games	United Kingdom
Beat Games	Germany
BHV Software GmbH & Co. KG	Germany
Big Blue Bubble Inc	Canada
Bigben Interactive (France)	France
Bit Composer Games GmbH Ig	Germany
Bitbox S.L.	Spain
Blast Entertainment Ltd.	United Kingdom
Blaze Games Ltd	United Kingdom
Blitz Games Studios Ltd	UK

Publisher Company	country
Blizzard Entertainment SAS	France
BLStream Sp. Z o.o.	Poland
Blue Label Entertainment Srl	Italy
Blue Monkey Studios Inc.	United Kingdom
Bluestone Interactive Limited	UK
Bongfish Interactive Entertainment	Austria
Boolat Limited Liability Company	Ukraine
Bplus	Austria
Braingame Publishing GmbH	Germany
Bright Things PLC	United Kingdom
Brightstar Entertainment Ltd	United Kingdom
Buena Vista Games, Inc.	France
Burda:ic GmbH	Germany
BWM Software und Vertriebs GmbH	Germany
C2C Games	France
Carré Multimedia	France
CCP hf.	Iceland
CD Projekt	Poland
CDV Software Entertainment	Germany
cdv Software Entertainment Ltd	UK
CE Europe	United Kingdom
Cinemax sro	Czech Republic
City Interactive SA	Poland
Cliffhanger Productions Software GmbH	Austria
Cloanto Italia srl	Italy
Codemaster Software Cie Ltd	United Kingdom
Conspiracy Entertainment Europe Limited	United Kingdom
Creat Studios Inc	USA
Crimson Cow GmbH	Germany
CyberPlanet Interactive Co., Ltd	Thailand
CyberSports Ltd	UK
D2C Games	USA
D3Publisher of Europe Ltd (D3P E Ltd)	United Kingdom
Dark Energy Digital	UK
Data Design Interactive Limited	United Kingdom
Davilex Games BV	The Netherlands
DHM Interactive	France
Dibbit Ltd	UK

Publisher Company	country
Digital Chocolate Ltd	Finland
Digital Leisure Inc	Canada
Discovery Concepts International Limited	United Kingdom
Disky Communications Europe B.V.	The Netherlands
DK-Games	France
DreamCatcher Europe (Ontario)	France
DTP Entertainment AG	Germany
Dusk2Dawn Interactive Limited	United Kingdom
Dynamic Systems Ltd	Ukraine
E2 Publishing srl	Italy
EA Swiss Sarl	Switzerland
East Entertainment Media GMBH eastasiasoft	Germany Hong Kong
Easy Computing NV	Belgium
Editorial Planeta DeAgostini S.A.	Spain
Educamigos s.l.	Spain
Eidos Interactive	United Kingdom
Eko Software	France
Elektrogames	France
ELEPHANT Entertainment	United Kingdom
Emme SA	France
Empire Interactive Europe Ltd	United Kingdom
Empire of Sports	Switzerland
Empty Clip Studios	USA
Endforce Ltd	United Kingdom
Enemy Technology LLC	USA
Engine Software	The Netherlands
Enlight Software	China
Ertain BV	The Netherlands
EVERSIM	France
Excalibur Publishing Limited	United Kingdom
Exkee	France
F4-Toys	France
Fiaa GmbH	Germany
Filao	France
Filematch Ltd T/A Microvalue	UK
Flashpoint AG	Germany
Focus Home Interactive	France
Focus Multimedia Limited	United Kingdom
Foreign Media Games	Netherlands
France Telecom DAC (Wanadoo)	France

Publisher Company	country
Franzis Buch&Softwareverlag GmbH	Germany
Frogster Interactive Pictures AG	Germany
FromSoftware Inc	Japan
Frontier Developments Ltd	United Kingdom
Frontline Studios	Poland
Frozenbyte, Inc.	Finland
Funcom	Norway
Fusion Labs Ltd.	United Kingdom
FX Interactive S.L.	Spain
G4Box	Canada
Gabitasoft BVBA	Belgium
Gaelco movieles SL	Spain
Gala Networks Europe Ltd	Ireland
Game Capital B.V.	The Netherlands
Game Outlet Europe AB	Sweden
Gamebridge Ltd	UK
Gamecock Media Europe Ltd	United Kingdom
Gameloft S.A.	France
GameOn GmbH	Germany
Games Factory Online BV	The Netherlands
GamesRouter Ltd	United Kingdom
Gammick Entertainment	Spain
GCC-Games Campus Cologn GmbH	Germany
geobra Brandstätter GmbH & Co. KG	Germany
Gevo Entertainment Pte Ltd	Singapore
Ghostfire Games	USA
Ghostlight Ltd.	United Kingdom
Giochi Preziosi HK Ltd	China
Gizmondo Europe Limited	United Kingdom
Glu Mobile	United Kingdom
GMX Media	United Kingdom
Gost Publishing	Belgique
Greenstreet Software Limited	United Kingdom
Grendel Games	Netherlands
Groove Media Inc.	Canada
GSC Game World	Cyprus
Guidance Interactive Healthcare	USA
Hanaho Games Inc.	USA
HB Studios Multimedia Ltd.	Canada

Publisher Company	country
HD Publishing BV	The Netherlands
Headup Games GmbH & Co. KG	Germany
Hell-Tech	Germany
Hip Interactive (LSP)	France
HMH-Hamburger Medien Haus Vertriebs GmbH	Germany
Home Entertainment Suppliers Ph. Ltd	Australia
Honeyslug Ltd	UK
Hothead Games, Inc.	Canada
Hudson Entertainment	USA
Hudson Soft Co. Ltd	Japan
Hydestile Media & Creative Ltd	UK
Iceberg Interactive BV	The Netherlands
Icon Games Entertainment Ltd	UK
Idea Games as	Czech Republic
Igniton Entertainment Ltd	United Kingdom
In2Games Ltd.	United Kingdom
IncaGold plc	United Kingdom
Indie Games Productions	France
Intenium GmbH	Germany
Introversion	United Kingdom
IQ Publishing SC	Poland
Isopod Labs, LLC	USA
Ivolgamus UAB	Lithuania
Jakks Pacific / Kids Biz	USA
JBT Nordic License Scandinavia AB	Sweden
Jelly Bridge Productions Ltd	United Kingdom
Jester Interactive	United Kingdom
Joanna Grahn	Sweden
Joindots GmbH	Germany
JoWood Production Software AG	Austria
Just Flight Ltd.	United Kingdom
JV Games Inc.	USA
K.E Mathiasen A/S	Denmark
K2 Networks Inc	United Kingdom
Kaasa solution GmbH	Germany
Kalypso Media GmbH	Germany
Kando Games	France
KIDDINX Entertainment GmbH	Germany
Koch Media	United Kingdom
Koch Media GmbH	Austria

Publisher Company	country
Koei Ltd	United Kingdom
Konami Digital Entertainment GmbH	Germany
Krea Medie A/S (Ltd.)	Denmark
Kuju Entertainment	UK
Lasnersoft	France
Leader S.p.A.	Italy
Legendo Entertainment AB (Iridon)	Sweden
Leon Brothers	France
LEXICON Entertainment	United Kingdom
Lexis Numérique	France
Lighthouse Interac. Game Publishing BV	Netherlands
Limbic Entertainment GmbH	Germany
Load Inc.	France
Lockpick Entertainment	Sweden
Luk Internacional SA	Spain
MadCatz Inc.	USA
MAGIX AG	Germany
Magnusoft Deutschland GmbH	Germany
Majesco Europe Limited	United Kingdom
Mamba Games Ltd	UK
Mastertronic Games Ltd	United Kingdom
Mastiff LLC	USA
Mattel UK Limited	United Kingdom
MC2 France	France
Media Sales&Licensing BV	The Netherlands
Mercury games	United Kingdom
Mere Mortals Limited	UK
Meridian4	Canada
Metro3D Europe Ltd	United Kingdom
Micro Application	France
MICRONET, S.A.	Spain
Microsoft Ireland	Ireland
Microtime	United Kingdom
Midas Interactive Entertainment Ltd	United Kingdom
Midway Games Ltd	United Kingdom
Mindscape France S.A.	France
Mindscape Northern Europe BV	The Netherlands
Momentum Bilgisayar Yazilim A.S	Turkey
Monte Cristo Multimedia SA	France
Moonpod Ltd	United Kingdom



Publisher Company	country
Morphicon Ltd	Germany
MTV Games	USA
MultiMediaManufaktur GmbH	Germany
Nabi Studios Pte Ltd	Singapore
Namco Bandai Games Europe	France
NAMCO BANDAI Games Inc.	Japan
NC Soft Europe Ltd.	United Kingdom
NDS Denmark A/S	Denmark
Neko entertainment	France
Nevrax France	France
Nexon Europe Ltd	United Kingdom
Nintendo of Europe GmbH	Germany
NIS Europe Inc.	USA
Nnooo	Australia
Nobilis	France
Nokia Products Limited	USA
Nordic Games Publishing AB	Sweden
Novalogic Ltd	United Kingdom
Noviy Disk	Russia
Oetinger Media GmbH	Germany
ONIMEDIA SP. Z O.O.	Poland
Openoko Entertainment	Poland
Outerlight Ltd	United Kingdom
Outso Ltd	UK
Over The Top Games SL	Spain
Oxygen Interactive	United Kingdom
P.M. Studios S.r.l.	Italy
P2 Games Ltd	UK
PAN Vision Distribution AB	Sweden
Panini Spa	Italy
Paradox Entertainment	Sweden
Paramount Digital Entertainment	USA
Pelfast, Inc	USA
Phantagram Co. Ltd	Korea
Phenomedia Publishing GmbH	Germany
Phoenix Games BV	United Kingdom
Phoenix Global Software Limited	United Kingdom
PILOT'S Stefan Schäfer GesmbH	Austria
Pinnalce Entertainment Ltd	UK
Play It Ltd	United Kingdom
Playful Entertainment Inc	Canada
Playlogic International NV	The Netherlands

Publisher Company	country
Playstos S.r.l.	Italy
plazz entertainment AG	Germany
Pompom Software Ltd	UK
PopCap Games, Inc.	USA
Positive Gaming Europe AB	Sweden
Power Up S.r.l.	Italy
Prelusion Games AB	Sweden
Prodigy Designs Trading	New Zealand
Project Three Interactive BV	The Netherlands
Promotion Software Agentur GMBH	Germany
Psyonix	USA
Pub Company Srl	Italy
Q Entertainment	Japan
Quality Games Online Ltd.	United Kingdom
RailSimulator.com Ltd.	UK
RAINBOW S.P.A.	Italy
Red Mile Entertainment	USA
Redback Sales Ltd	United Kingdom
RedOctane	USA
Reef Entertainment Limited	United Kingdom
responDESIGN	USA
Rising Star Games Ltd	United Kingdom
Riverdeep Interactive Learning Limited	Ireland
rokapublish UG	Germany
Rondomedia Marketing & Vertriebs GmbH	Germany
Ronimo Games	Netherlands
ROURKE LTD.	UK
RTL Interactive GmbH	Germany
S.A.D Software Produktions & Vertriebs GmbH	Germany
Sabarasa Entertainment SRL	Argentina
Sammy Europe Ltd	United Kingdom
Sanuk Software Co Ltd	Thailand
SC2X-MadMonkey Studios	France
SEGA Europe Ltd	United Kingdom
SevenOne Intermedia GmbH	Germany
SG Diffusion S.A.S.	France
Shindo S.A.S.	France
Shin'en Multimedia GmbH	Germany

Publisher Company	country
SimBin Studios AB	Sweden
Slam Games Ltdf	UK
Slitherine Software UK Ltd	UK
SnapDragon Games GmbH	Germany
Sniper Entertainment	France
SNK PLAYMORE CORPORATION	Japan
SOE Europe Ltd	USA
Sony BMG Music Entetainment GmbH	Gemany
Sony Computer Entertainment Europe	United Kingdom
SouthPeak Interactive	UK
Spin Master Studios	USA
Square Enix Ltd	United Kingdom
Steel Penny Games, Inc	USA
Stickmen Limited	New Zealand
Submarine	The Netherlands
Sunflex Europe GmbH	Germany
SYBEX-Verlags- und Vertriebs-GmbH	Germany
System 3 Ltd	United Kingdom
Tailteann Games Ltd.	Ireland
Taito Corporation	Japan
Take 2	United Kingdom
Tapwave Inc.	USA
TDK	Luxembourg
Team17 Software Limited	UK
Teamworks Productions Limited	United Kingdom
Techland	Poland
Tecmo, Ltd.	Japan
TELEagri Media GmbH	Germany
Telltale Games	USA
Tessloff Verlag	Germany
TETRIS ONLINE Inc	USA
Teyon	Poland
The Code Monkeys Ltd	UK
The Fighter Collection	UK
The Game Creators Ltd	United Kingdom
The Games Company Worldwide GmbH	Germany
The Toy:Lobster Company Ltd	United Kingdom
THQ	United Kingdom

Publisher Company	country
THQ Wireless	Luxembourg
Tiki Games Inc	USA
Tivola Publishing GmbH	Germany
Tomy UK Ltd	UK
Transposia NV	Belgium
Triangle Studios	Netherlands
Tripwire Interactive LLC	United Kingdom
TV4	Sweden
Two Tribes BV	The Netherlands
Ubisoft EMEA	France
Ubisoft NL	The Netherlands
UFO Interactives games Inc	USA
United Independent Entertainment GmbH	Germany
United Publishing Interactive Ltd	Germany
United Soft Media Verlag GmbH (USM)	Germany
Upfront Promotions	UK
Vanilla Live Games Softwareentwicklungs GmbH	Austria
Vertigo Games	The Netherlands
Villa-Hirschberg Online GmbH	Germany
Virgin Play S.A.	Spain
Virtual Toys S.L.	Spain
Vogster Entertainment	USA
VS Digital GmbH	Germany
Wacom Europe GmbH	Germany
Walkon	Germany
Walt Disney Home Entertainment	United Kingdom
Walt Disney Internet Group	United Kingdom
Warner Bros Entertainment UK Ltd	UK
watAgame Aps	Denmark
WayForward Technologies, Inc.	USA
WAYWARDXS Entertainment SRL	Italy
Wendros AB	Sweden
Whiptail Interactive (Europe) SL	Spain
White Park Bay Software	United Kingdom
Whizz-Biz Ltd	UK
Wired Productions Ltd	UK
XGen Studios Inc	Canada
XIM Inc	United Kingdom
Yoostar Ltd.	United Kingdom




Publisher Company	country
YUKE's Company of America	USA
Yullaby SARL	France
ZEN Studios Ltd.	Hungary
ZeniMax Europe Ltd/Bethesda Softworks Europe	United Kingdom
Zushi Games	United Kingdom
Zuxxez Entertainment AG	Germany



















## ANNEX 4 : PEGI Assessment Form

Rating	No.	Question	Help	Content descriptor
		<b>Does the game contain</b>		
<b>BBFC IFCO</b>	1	Moving images that depict human sexual activity	This means all aspects of human sexual intercourse, masturbation and sexual foreplay (homosexual and lesbian activity included). Male or female sexual organs need not be visible. It is unlikely that an innocent peck on the cheek or friendly embrace constitutes sexual activity unless something more extreme is shown (eg. a couple copulating). Once any scene that depicts a friendly relationship begins to have sexual overtones err on the side of caution in answering this question.	---
<b>BBFC IFCO</b>	2	Moving images that depict acts of force or restraint associated with human sexual activity	This means that there is a degree or element of enforced sexual activity (non-consenting) although the level of sexual activity (and degree of detail shown) need not necessarily be as extreme as in Question 1.	---
<b>BBFC IFCO</b>	3	Moving images that depict mutilation or torture of human-like or animal-like characters	This means a character that looks like a human or animal. If it looks human it should be treated as being human even if it is unrealistic. (eg. if something called a zombie or any other name looks like a human it should be treated as human). The mutilation or torture will need to be horrific and fairly detailed and will very often be associated with large amounts of blood or gore.	---
<b>BBFC IFCO</b>	4	Moving images that depict other acts of gross violence towards human-like or animal-like characters	This means a character that looks like a human or animal. If it looks human it should be treated as being human even if it is unrealistic. (eg. if something called a zombie or any other name looks like a human it should be treated as human). Gross violence will mean horrific, brutal or repulsive depictions of death, injury, dismemberment or torture and other methods of bringing severe pain or injury to the recipient. The images will be 'disgusting' or 'stomach churning' and have a capacity to sicken. They will usually be associated with large amounts of blood or gore.	---
<b>BBFC IFCO</b>	5	Moving images that depict human genital organs	This means the male penis and the female labia and vagina. It does not include 'bums and boobs' or pubic hair.	---
<b>BBFC IFCO</b>	6	Moving images that depict human urinary or excretory functions	The meaning is self-explanatory and applies to male or female.	---
<b>BBFC IFCO</b>	7	Moving images that depict techniques likely to be useful in the commission of offences	The descriptions have to show how the offences can be carried out. For example an instruction manual showing how to make a molotov cocktail or bomb would be included under this question as would details of the implements needed to break into a car and how to use them.	---






Rating	No.	Question	Help	Content descriptor
<b>BBFC IFCO</b>	8	Moving images of any kind that are likely to any extent to stimulate or encourage human sexual activity	A game likely to stimulate or encourage human sexual activity will probably show human sexual activity resulting in a 'yes' answer to Question 1. Beyond this it should be remembered that stimulation or encouragement can be achieved by the use of words as well as pictures. The game must induce some feeling of wanting to indulge in sexual activity. The images will be sexually provocative or titillating (eg.strip tease)	---
<b>BBFC IFCO</b>	9	Moving images of any kind that are likely to any extent to stimulate or encourage acts of force or restraint associated with human sexual activity	A game likely to stimulate or encourage acts of force or restraint associated with human sexual activity will probably show such acts resulting in a 'yes' answer to Question 2. Beyond this it should be remembered that stimulation or encouragement can be achieved by the use of words as well as pictures. The game must induce some feeling of wanting to indulge in such acts.	---
<b>BBFC IFCO</b>	10	Moving images of any kind that are likely to any extent to stimulate or encourage mutilation or torture of human-like or animal-like characters	A game likely to stimulate or encourage such mutilation or torture will probably show such acts resulting in a 'yes' answer to Question 3 or 4. Beyond this it should be remembered that stimulation or encouragement can be achieved by the use of words as well as pictures. The game must induce some feeling of wanting to indulge in such acts.	---
<b>BBFC IFCO</b>	11	Moving images of any kind that are likely to any extent to stimulate or encourage other acts of gross violence	A game likely to stimulate or encourage such mutilation or torture will probably show such acts resulting in a 'yes' answer to Question 3 or 4. Beyond this it should be remembered that stimulation or encouragement can be achieved by the use of words as well as pictures. The game will call for involvement in torture or mutilation in ways which make the player take pleasure in the prospect of treating real-life humans or animals in the same way and will induce some feeling of wanting to indulge in such acts.	---
<b>BBFC IFCO</b>	12	Moving images of any kind that are likely to any extent to stimulate or encourage the commission of offences	A game likely to stimulate or encourage the commission of offences will probably show such acts resulting in a 'yes' answer to Question 7. Beyond this it should be remembered that stimulation or encouragement can be achieved by the use of words as well as pictures. The game must induce some feeling of wanting to indulge in such acts.	---
<b>BBFC IFCO</b>	13	Does the game contain film footage that is not a genuine and relevant part of the game	The use of film footage as a scene setting introduction, an explanatory link between different levels of the game and as an explanatory conclusion to the game will not warrant a 'yes' answer to this question 13. If the film footage does not fulfil any of these functions or is unrelated to the story line of the game or if the game is being used as a pretext for the showing of all or a substantial part of a film a 'yes' answer should be given to this question13.	---






Rating	No.	Question	Help	Content descriptor
<b>BBFC IFCO</b>	14	Will the retail version of the game include items that are not part of the game	This will include feature film trailers, film footage that is not a genuine and relevant part of the game, trailers and advertisements, interviews and reviews.	---
<b>BBFC IFCO</b>	15	Has the game been submitted, or is it intended to submit the game to the BBFC or IFCO for legal classification in the UK and Ireland?	This is to cover those occasions where the publisher has decided to submit a game to the BBFC and the Irish Film Censors Office prior to rating under the PEGI system or where the game has already been legally classified by the BBFC or IFCO.	---
<b>18</b>	16	Depictions of gross violence, which includes torture, dismemberment, sadism and horrific depictions of death or injury towards human-like or animal-like characters	Gross violence will mean depictions of decapitation, dismemberment or torture and other horrific methods of bringing death, severe pain or injury to the recipient. This will usually be associated with large amounts of blood or gore. The emphasis is on the horrific nature of the violence. The violence will not be treated as gross violence if the recipients die or are injured in an unrealistic manner. If they instantly disappear in a puff of smoke or are killed/injured and then come back to life or appear uninjured this will not be treated as gross violence. The characters must look like humans or animals. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human).	
<b>18</b>	17	Depictions of apparently motiveless killing or serious injury to multiple numbers of innocent human-like characters	This is where groups of human-like characters are killed or injured at random for no apparent reason and deals with themes such as the killing of pedestrians in the street, shoppers in a shopping arcade and children in a school. The characters must look like humans or animals. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human).	
<b>18</b>	18	Depictions of violence towards vulnerable or defenceless human-like characters	The characters must look like humans. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human). Vulnerable human-like characters will include in particular women and children. Defenceless characters will include those that have no opportunity to avoid the violence (eg. by running away or hiding). It will not generally include characters who are part of the game play (eg. a soldier captured by the enemy and subsequently tied up and shot). No character will be considered vulnerable or defenceless if they are not intended to be part of the game play. However, any violence in this context should be considered on its merits.	





Rating	No.	Question	Help	Content descriptor
18	19	Depictions of sexual activity with visible genital organs	Sexual activity means all aspects of human sexual intercourse, masturbation and sexual foreplay (homosexual or lesbian activity included) where a male or female sexual organ is visible. The depiction of 'boobs and bottoms' or pubic hair only will not be treated as visible sexual organs.	
18	20	Depictions of sexual violence or threats (including rape)	This will mean acts of a sexual nature where they are inflicted against a non-consenting human-like characters, including rape or the infliction (including self-infliction) of pain on genital organs.	
18	21	Detailed descriptions of techniques that could be used in criminal offences	The descriptions have to show how the offences can be carried out. For example an instruction manual showing how to make a molotov cocktail or bomb would be included under this question as would details of the implements needed to break into a car and how to use them.	
18	22	Glamorisation of the use of illegal drugs	The depictions will show that the user of the drugs is able to achieve success (win the game, get the girl, kill the enemy, commit the crime) after the use of illegal drugs. The drugs concerned should be real and be illegal (not fantasy or legal drugs).	
18	23	Depictions of ethnic, religious, nationalistic or other stereotypes like to encourage hatred	The emphasis here is on the words 'likely to encourage hatred'. It should be noted that any such depictions are very likely to infringe national criminal laws and cannot be included in the game in any event. It is the responsibility of each game publisher to comply with national criminal laws and use of the PEGI system does not absolve the game publisher from such responsibility or provide any legal or other defence to infringement of national criminal laws.	
18	24	Sexual expletives or blasphemy (only answer 'yes' to this question if a 'yes' answer has been given to any of questions 16 –23)	A 'yes' answer to this question 24 will ensure that a language descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 16 – 23 do not answer 'yes' to this question 24. The most common sexual expletives are fuck, cunt, motherfucker and cocksucker although this list is not exhaustive. Blasphemy means irreverent depictions or words concerning sacred matters or religious beliefs (not restricted to the Christian faith). It should be noted that blasphemy is likely to be illegal under national criminal laws and may not be included in the game in any event.	
18	25	Moving images that encourage and/or teach the use of games of chance that are played/carried out as a traditional means of gambling (only answer 'yes' to this question if a 'yes' answer has been given to any of questions 16 –23)	A 'yes' answer to this question 25 will ensure that a gambling descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 16 – 23 do not answer 'yes' to this question 25. This refers to types of betting or gambling for money that is normally played/carried out in casinos, gambling halls, racetracks. This does not cover games where betting or gambling is simply part of the general storyline. The game must actually teach the player how to gamble or bet and/or encourage the player to want to gamble or bet for money in real life. For example this will include games that teach the player how to play card games that are usually played for money or how to play the odds in horse racing.	

Rating	No.	Question	Help	Content descriptor
16	26	Depictions of realistic looking violence towards human-like or animal-like characters	This means violence where the character reacts as it would in real life. It is not necessary for there to be any blood or gore. The characters must look like humans or animals. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human). This does not include sporting action where the sporting action is depicted within the rules of the game.	
16	27	Sustained depictions of death or injury to human-like or animal-like characters (except arcade style or sporting action)	This means that all or the majority of the game-play relates to violence. The characters must look like humans or animals. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human). Arcade style action refers mostly to 2D effect depictions where the characters move left and right to attack each other. The sporting action must be depicted within the rules of the sport concerned.	
16	28	Depictions of arcade style or sporting action showing violence containing blood or gore	Arcade style action refers mostly to 2D effect depictions where the characters move left and right to attack each other. If there is no blood or gore then a 'yes' answer to question 39 is probably more appropriate.	
16	29	Depictions of sexual intercourse without visible genitals	This is self explanatory although it must be fairly apparent what the characters are doing. 'Boobs and bums' do not count as genital organs and nor does the showing of pubic hair only.	
16	30	Depictions of erotic or sexual nudity	This is where the depiction of nudity (including partial nudity) could result in sexual arousal or is shown as a prelude to human sexual activity. This can include still pictures particularly if they depict an erotic activity. This will not generally include straightforward pin-ups.	
16	31	Sexual expletives or blasphemy	The most common sexual expletives are fuck, cunt, motherfucker and cocksucker although this list is not exhaustive. Blasphemy means irreverent depictions or words concerning sacred matters or religious beliefs (not restricted to the Christian faith). It should be noted that blasphemy is likely to be illegal under national criminal laws and may not be included in the game in any event.	
16	32	Encouragement of the use of tobacco or alcohol	This means where the character gains advantage in the game by the use of tobacco or alcohol. It also includes prominent advertising encouraging the use of tobacco or alcohol products.	
16	33	Depictions of the use of illegal drugs	This includes the use of illegal drugs in any circumstances.	
16	34	Glamorisation of crime	This is where the depiction of criminal acts could encourage the games player to think that 'crime pays' or has no negative repercussions.	



Rating	No.	Question	Help	Content descriptor
16	35	Moving images that encourage and/or teach the use of games of chance that are played/carried out as a traditional means of gambling(only answer 'yes' to this question if a 'yes' answer has been given to any of questions 26 –34)	A 'yes' answer to this question 35 will ensure that a gambling descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 26 – 34 do not answer 'yes' to this question 35.This refers to types of betting or gambling for money that is normally played/ carried out in casinos, gambling halls, racetracks. This does not cover games where betting or gambling is simply part of the general storyline. The game must actually teach the player how to gamble or bet and/or encourage the player to want to gamble or bet for money in real life. For example this will include games that teach the player how to play card games that are usually played for money or how to play the odds in horse racing.	
12	36	Depictions of realistic looking violence towards fantasy characters	A fantasy character is a character that does not exist in real life and does not take a human appearance and includes ghosts, gremlins, dragons and other mythical creatures. In determining whether the violence is realistic it is assumed that the fantasy character does actually exist and reacts as if it were a human-like character.	
12	37	Depictions of non-realistic looking violence towards human-like or animal-like characters	The characters must look like humans or animals. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human). The characters react in a way that is not representative of real life and although you know that the characters are being killed or injured you do not really see very much (the characters immediately disappear in a puff of smoke or are otherwise so small that you really cannot see what exactly is happening).	
12	38	Moving images that depict any minor assault on a human-like character that does not result in any obvious injury or harm (whether or not it is realistic looking violence)	This is where the violence to the human-like character is realistic but very minor such as a slap or smack and the victim does not show any apparent harm or injury.	
12	39	Depictions of arcade style or sporting action showing violence	Arcade style action refers mostly to 2D effect depictions where the characters move left and right to attack each other. This question relates to arcade style or sporting action where there is no blood or gore. The sporting action must be depicted within the rules of the sport.	

Rating	No.	Question	Help	Content descriptor
12	40	Words or activities that amount to obvious sexual innuendo or explicit sexual descriptions or images or sexual posturing	<p>be sexually explicit but do not amount to eroticism (a brief glimpse of a lady with bare boobs at a window or a brief glimpse of a naked couple (not showing genitalia) getting into bed). The sexual innuendo must be obviously relating to sexual intercourse/foreplay and can consist of words and/or activity. This would cover instances in which it is clear that sexual intercourse is taking place but the participants are out of view, under sheets etc. The importance is sexual connotation. If however, the couple can be seen, even if they are partially clothed, then question 27 'sexual intercourse without visible genitals' will be more appropriate. The test is whether the images could prompt sexual curiosity on behalf of the player.</p> <p>Sexual posturing means dancing or posing (while remaining clothed) in a manner intended to put across a sexual message or suggestion. This will include such things as pole dancing, lap dancing and even some of the more suggestive music video sequences.</p>	
12	41	Mild swearing and/or offensive language	<p>This means bad language that falls short of sexual expletives and includes the words damn, hell, God, bloody, son-of-a-bitch, sod, tart, crap, bugger, screw, arse, slag, slut, tosser, Christ, dickhead, bitch, shit, piss off, whore, arsehole, prick, bollocks, twat, bastard, wanker and shag. It also covers offensive language such as nigger, coon, yid, queer, dyke and other racially or gender offensive words.</p>	
12	42	Moving images that encourage and/or teach the use of games of chance that are played/carried out as a traditional means of gambling	<p>This refers to types of betting or gambling for money that is normally played/carried out in casinos, gambling halls, racetracks. This does not cover games where betting or gambling is simply part of the general storyline. The game must actually teach the player how to gamble or bet and/or encourage the player to want to gamble or bet for money in real life. For example this will include games that teach the player how to play card games that are usually played for money or how to play the odds in horse racing.</p>	
7	43	Depictions of non-realistic violence towards fantasy characters	<p>A fantasy character is a character that does not exist in real life and does not take a human appearance and includes ghosts, gremlins, dragons and other mythical creatures. The characters react in a way that would not be expected of human-like characters and although you know that the characters are being killed or injured you do not really see very much (eg. the characters immediately disappear in a puff of smoke or are otherwise so small that you really cannot see what exactly is happening).</p>	
7	44	Depictions of non-detailed and non-realistic violence towards non-detailed human-like characters	<p>This is where the depiction gives only a basic representation of a human (stick men or pixelated characters). If the characters are small but are detailed enough to be clearly recognisable as humans a 'yes' answer to this question is not appropriate.</p>	

Rating	No.	Question	Help	Content descriptor
7	45	Depictions of implied violence to humans where the actual violence (death or injury) is not shown	This is where you do not actually see any violence to humans but it is obvious what is happening. It covers such matters as the bombing of a city where you know civilians are killed and injured, blowing up a tank or shooting down a plane where you know the crew are killed, smashing into cars or other vehicles where the driver/passenger must be injured.	
7	46	Depictions of violence that is humorous and is set in a cartoon, slapstick or child-like setting but might, in any way, be disturbing to younger children	The humorous element is essential for violence to be depicted at this level, however, it is immaterial whether the characters are realistic (Laurel and Hardy style), non-realistic (fantasy characters or characters drawn as you would expect in comic books) or cartoon characters (Bugs Bunny or Tom and Jerry style). It refers to the actual violence and not merely to the overall theme of the game. For instance an act of violence, which in itself is not humorous, contained in a comedy would be more appropriate at the 12 level. No blood or obvious injuries should be visible. The disturbing element is by necessity subjective but will cover anything that might reasonably be considered as possibly disturbing to younger children. An example may be where the recipient of the violence (albeit humorous) is a child and the player may be able to identify with the character. If there is any doubt then this question should be answered yes in preference to the 3 question.	
7	47	Pictures or sounds likely to be scary or frightening to young children	This is where you do not actually see or hear anything specifically violent but nevertheless because of the sounds or depictions the overall theme may be frightening to young children (haunting or aggressive music, entering a haunted house, background screams or rustling in the undergrowth).	
3	48	Depictions of nudity in a non-sexual context	This is where the nudity (which includes partial nudity but no visible genitalia) has no direct or implied sexual meaning such as a lady breast feeding a baby, topless sunbathing or a nudist beach.	----
3	49	Depictions of violence that is humorous and is set in a cartoon, slapstick or child-like setting	The humorous element is essential for violence to be depicted at this level, however, it is immaterial whether the characters are realistic (Laurel and Hardy style), non-realistic (fantasy characters or characters drawn as you would expect in comic books) or cartoon characters (Bugs Bunny or Tom and Jerry style). It refers to the actual violence and not merely to the overall theme of the game. Therefore an act of violence, which in itself is not humorous, contained in a comedy would be more appropriate at the 12 level. Nothing should be shown that might in any way disturb younger children. No blood or obvious injuries should be visible.	
	50	Does the game allow online game play with or against other people?	This applies to games where it is necessary to connect to any website, portal, gateway or other internet connection in order to play the game. It includes those games played as 'single player' as well as those played as 'multi-player'. It does not include games that are only downloaded via the internet and subsequently played on the PC or console without the requirement for an internet connection for the actual game play.	

## ANNEX 5 PEGI complaints

Date	Game	Initial rating	New rating	Publisher	Complainant	Ad hoc Complainants Board
05-Nov-07	Global conflict Palestine	16	12	DTP Entertainment AG	DTP Entertainment AG	Laurent Baup (chair) Dominika Urbańska-Galanciak Odd Arild Olsen
04-Aug-08	LEGO Indiana Jones: The Original Adventures	12	7	Activision	Activision	Maarit Pietinen (chair), Dominika Urbańska-Galanciak and Spyros Pappas
25-Aug-08	STAR WARS: CLONE WARS™	12	12	Activision	Activision	Antonio Xavier (Chair), Spyros Pappas, Lars Gjerlufsen
12-Nov-08	Animal Crossing Wild World	12	7	Nintendo	Nintendo	Dominika Urbańska-Galanciak (Chair), Rosemary Walker, Jean-Pierre Quignaux
30-Nov-08	Piraten – Volle Breitseite	7	3	Hamburger Medien Haus	Hamburger Medien Haus	Laurent Baup (Chair) Ger Connolly Eva Petersson
28-Jan-09	SCRABBLE 2009	16	12	Ubisoft	Ubisoft	Rosemary Walker Spyros Pappas Jean Pierre Quignaux (Chair)

Complaint	PCB Conclusion
<p>The game already received a 12 rating in Germany: the goal is to educate 13-19 years olds about the conflict, so a minimum of violence is necessary to demonstrate the conflict's severity and emotional impact.</p>	<p>The AHCB deemed it important that the game never allows the player to actually commit violent acts but only to witness them. They therefore consider that it would be appropriate to treat GCP as an exception and to lower the rating to 12, while keeping the descriptor "violence".</p>
<p>The game portrays Lego characters made with Lego bricks. The violence in the game clearly resembles Lego characters coming apart rather than anything that could be mistaken as a real human character.</p>	<p>The look of the characters in the game is similar to plastic LEGO characters sold in stores and the movement is non-human-like. LEGO characters can also be disassembled to bricks in the game. For these reasons, the LEGO characters are rather sui-generis ones closer to the cartoon characters and, in any way, not human-like.</p>
<p>Clone Wars videogames is based on a cartoon designed for kids, while Star Wars is a trusted family entertainment brand. The combat is of a fantasy nature and the violence is similar to other titles rated 7.</p>	<p>We did not find in the game any element (humour, for instance) that could amenize the repeated violence towards human-like characters, so we conclude that the 12 rating must be kept as it was originally established.</p>
<p>The dialogue in the game, considered offensive by Nicam, should be judged in relation with the context (a grumpy mole who dislikes being called out by the player's actions).</p>	<p>All sentences can be treated as growing verbal violence set in a cartoon or slapstick style and therefore the game can be re-rated 7 with the violence descriptor (referring to question nr. 46 of Pegi questionnaire).</p>
<p>NICAM argued that the game should be rated "7" based on its violent content.</p>	<p>the AHCB consider that the game contains violence, but in an inoffensive and gentle way, why it should not represent any risk for minors down to 3. The AHCB has also pointed out a problem in the wording of question 46, namely the use of the words "in any way".</p>
<p>This rating is not the rating we expect for a family game like Scrabble</p>	<p>Considering that Scrabble 2009 contains swear words in a not strictly interactive manner and may use them without an intent to use them on the base of their meaning, our AHCB recommends, on grounds of proportionality to rate this game in regard of question 41 (12).</p>

PEGI

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