



THE  
PAN EUROPEAN  
GAME  
INFORMATION  
2005-2006  
ANNUAL REPORT

## Table of Contents

<b>Table of Contents</b>	<b>2</b>
<b>Introduction</b>	<b>4</b>
<b>Chapter 1: The PEGI system and how it functions</b>	<b>5</b>
<i>AGE RATING CRITERIA.</i>	6
<i>AGE CATEGORIES</i>	7
<i>CONTENT DESCRIPTORS</i>	8
<i>STEPS OF THE RATING PROCESS</i>	9
<i>ARCHIVE LIBRARY</i>	10
<i>PEGI BOARDS AND COMMITTEES</i>	11
<b>Advisory Board</b>	<b>11</b>
<b>Complaints Board</b>	<b>13</b>
<b>Criteria Committee</b>	<b>14</b>
<b>Legal Committee</b>	<b>14</b>
<b>Chapter 2 The PEGI Administration and Coders</b>	<b>15</b>
<i>THE OWNER: ISFE</i>	15
<i>THE ADMINISTRATORS: NICAM</i>	17
<i>THE ADMINISTRATORS: VSC</i>	18
<i>PEGI CODERS</i>	19
<b>Chapter 3 The PEGI Criteria</b>	<b>21</b>
<i>SELF-ASSESSMENT FORM</i>	21
<i>CRITERIA CHANGES IN 2005-2006</i>	21
<b>Gambling</b>	<b>22</b>
<b>Minor Assault</b>	<b>23</b>
<b>Non-detailed and non-realistic violence towards non-detailed human-like characters</b>	<b>23</b>
<b>Implied violence</b>	<b>23</b>
<b>Chapter 4 Communication and Information to Consumers</b>	<b>24</b>
<i>PEGI WEBSITE</i>	24
<b>Visitors</b>	<b>24</b>
<b>Spontaneous reactions from consumers</b>	<b>25</b>
<i>When a consumer speaks...</i>	25
<i>Another consumer view</i>	26
<b>Complaints concerning the advertising of an interactive software product</b>	<b>28</b>

<i>PEGI COMMUNICATION CAMPAIGNS</i>	29
<b>Belgium and the Netherlands</b>	<b>29</b>
<b>Iceland</b>	<b>29</b>
<b>Denmark</b>	<b>29</b>
<b>Spain</b>	<b>30</b>
<b>Sweden</b>	<b>30</b>
<b>Switzerland</b>	<b>30</b>
<b>United Kingdom</b>	<b>31</b>
<b>Annex I: Code of conduct for the European interactive software industry regarding age rating labelling, promotion and advertising of interactive software products.</b>	<b>32</b>
<b>Annex 2: The PEGI signatories</b>	<b>38</b>
<b>Annex 3: Assessment Form: The PEGI Questionnaire</b>	<b>43</b>

## Introduction

Dear reader,

Three years after its launch in April 2003, PEGI has arguably reached cruise speed.

Accordingly, we thought we owe the general public – prime users of the system – and European policy makers – prime shapers of this self-regulation – a fully fledged report on the way PEGI has been operating, on a few tricks that we believe stand behind its amazing uptake with European consumers and on our project to make it even more efficient in the online environment whose relevance is growing for our industry.

The idea is to walk you through these critical areas the way a formal report would, i.e. by sharing facts, figures and all possible details likely to meet the questions you might have been burning to ask about this one of a kind experiment in European self-regulation. However, the hallmark of this industry being entertainment, please bear with us if this booklet does not feel as dull as a regular annual report should and ...don't hesitate to turn your unanswered questions to the ISFE secretariat.

Enjoy the reading.

### **PEGI Mission statement**

The Pan-European Game Information (PEGI) system aims to provide European consumers, and especially those in charge of educating minors, with intelligible information on games from an independent source. As a result of having put trust in PEGI, these educators will be able to make informed decisions on buying PC and videogames.

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

## Chapter 1: The PEGI system and how it functions

The PEGI system of voluntary self-regulation is the first ever pan-European age rating system. It has been operating in Europe since April 2003 and provides the public (particularly parents) with an indication of the age ranges for which an entertainment software product is suitable. The effectiveness of the system is based on its ability to deliver appropriate information and advice to consumers, at the time of purchase, regarding the nature of the content and age suitability in accordance with expertly developed and assessed criteria.

The PEGI system applies to all entertainment software, videogames, computer games, etc, whatever the format or platform involved, sold or distributed in the EEA by a company participating to the system. Together with EU institutions, a vast majority of governments in the EU and the EEA have blessed this project from the start, thus providing a critical impetus. The PEGI system replaced former national rating systems, such as the ELSPA system in the UK and the SELL system in France, and applies to the EU Members States, to the exception of Germany, as well as to Lichtenstein, Norway, Switzerland and Iceland.

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 commit 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 more than 5900 games rated by the end of September 2006, the PEGI system has displayed a proven ability to rally the vast majority of 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 as regards the selection of games that suit their family with utmost self-confidence. This achievement is best illustrated by a survey conducted by Nielsen Interactive Europe in the summer of 2004, i.e. one year after PEGI was launched. Its main findings take on enhanced significance on being compared with those of a poll taken by Australia's OFLC three years after they started to implement their own rating system among a much smaller population sharing a common language:

- 42% of parents, 35% of non-parents were aware of a classification system in Australia vs close to 60% in the 5 European countries surveyed by Nielsen.
- Aided recognition of the PEGI symbols reached 72% of respondents to the PEGI questionnaire, thus matching the 74% observed among young Australians.
- only 38% of adults, 45% of young people would use the Australian system. Almost 40% of respondents to the Nielsen study (42% of parents, PEGI's key target) found the system "quite useful".
- 40% of adult respondents, 20% of young people who said they were aware of the Australian system proved unable to nominate specific classification levels. In Europe, 40% of Nielsen respondents reported spotting the PEGI descriptors, vs 52% reporting they had not noticed.

On conducting another survey in 2005, Nielsen ascertained that 81% of parents asked said that agreed to this statement: "You always check age rating on games your child plays".

The PEGI system belongs to the Interactive Software Federation of Europe (ISFE) which is based in Belgium. ISFE have contracted the administration of the system to the Netherlands Institute for the Classification of Audiovisual Media (NICAM) which is based in the Netherlands. The Video Standards Council (VSC) is acting as NICAM's agent in the UK.



### **AGE RATING CRITERIA.**

A working group of experts reflecting a cross-section of occupations and European locations met between May 2001 and May 2002, thus affording the fledgling project a hothouse where to grow in strength. After checking how a sample of 100 games would fare under existing national rating systems and the one contemplated with a pan-European scope, a critical sub-committee of this working group recommended that the new pan-European system would use the following criteria groups for the assessment of content:

- Violence
- Sex/Nudity
- Discrimination
- Drugs
- Fear
- Language (Bad and sexual)
- Gambling

Within each criteria group, levels of severity have been identified in order to determine the appropriate age suitability category. Each criterion has been placed in the appropriate age category after careful consideration of the following factors:

- Suitability for players to be exposed to the content;
- Current positioning within existing systems throughout Europe;
- Acceptability across Europe.

The majority of criteria have remained broadly in the same age categories as they were within the former national systems; adjustments, where necessary, went in the sense of aligning the ISFE system with the stricter national models.

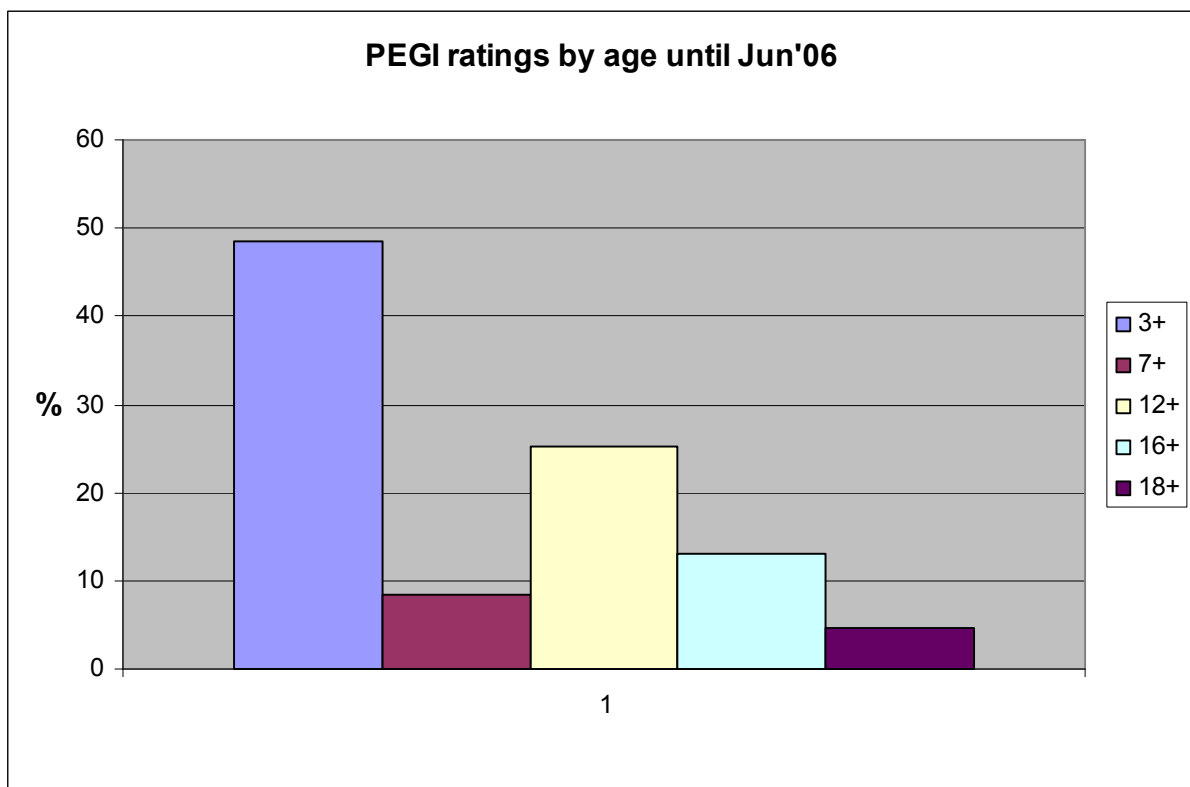
### AGE CATEGORIES

After careful consideration, and with reference to the existing age categories used by national systems in Europe, it was decided to go for the higher end of each bracket. Under the PEGI system there are five age-rating levels:



The mandatory age categories applicable in Portugal and Finland are different from PEGI age categories. In order to comply with the current national laws of these countries:

- For Portugal the 3+ PEGI rating need to be over-stickered with a 4+ and the 7+ PEGI rating will need to be over-stickered with a 6+.
- For Finland the 12+ PEGI rating need to be over-stickered with an 11+ and the 16+ PEGI rating will need to be over-stickered with a 15+.



## CONTENT DESCRIPTORS

The age-rating logos shown above indicate the age-range for which a game is suitable. The content descriptors are used in conjunction with the age-rating logos to indicate the main reason(s) why a game is given a particular age rating.

The use of content descriptors provide additional information to customers (particularly parents) to enable them to come to an informed decision. The descriptors also serve a useful purpose on a pan-European basis where there are differing views on levels of acceptability particularly on the matter of bad language and to an extent on matters of sex and nudity.

Each age-rating logo, to the exception of the 3+ logo, as it appears on packaging is accompanied by a descriptor(s), i.e. bad language, discrimination, drug, fear, sex and violence.



Upon registration of an entertainment software on-line the PEGI system is not only specifying the age-rating but also the content descriptor(s) that must be used in conjunction with the age-rating.

**PEGI ratings by platform until Jun'06**

<i>Platform</i>	<i>Games</i>	<i>Platform</i>	<i>Games</i>
PC	2117	Plug and Play	41
Playstation 2	1186	Macintosh	34
XBox	648	DVD Game	28
Game Boy Advance	477	Gizmondo	17
GameCube	301	Mobile	15
Sony PSP	174	Digiblast	14
Nintendo DS	163	Vista	10
Playstation 1	130	Tapwave Zodiac	4
XBox 360	115	Nintendo Wii	1
Nokia mobile phone	60	Playstation 3	0



## STEPS OF THE RATING PROCESS

The rating procedure is as follows:

1. Prior to release, publishers fill in, for their product and each version thereof, an on-line product assessment form (See Annex 2).

Compatibility with legal requirements: 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, the ISFE labelling system shall be used in these countries in congruence with local rules.

The system has been especially designed to assist entertainment software publishers to reach a decision as to whether a game has lost the general exemption from legal classification under UK law and must be submitted to the British Board of Film Classification (BBFC) for legal classification before it can be sold in the UK.

2. In all other cases, the publisher completes the second part of the questionnaire, which assesses the content of product taking into account the possible presence of violence, sex, discrimination and other sensitive image or sound content.
3. According to the responses given, the online system automatically determined an age rating, along with content descriptors indicating the reason why the entertainment software was classified in the selected age category.
4. The age rating groups are divided as follows: 3+, 7+, 12+, 16+ and 18+.
5. If the provisional rating is 12+, 16+ or 18+, the ISFE administrator is systematically screening the entertainment software.
6. Games rated 3+ and 7+ will be viewed randomly, or if the ISFE administrator believes there could be any doubt over the correct completion of the product assessment form.
7. The ISFE administrator is subsequently delivering to the publisher a license for the use of the age-rating icon together with the related content descriptor(s).
8. The publisher is then 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

ISFE has required NICAM to establish an archive library of all marketed products rated under the PEGI system. Publishers using the system are providing NICAM with a copy of every entertainment software rated within ten working days of the product's release date. Where an entertainment software has been rated for different platforms a copy on each platform is provided.

Since the launch of the PEGI system April 2003 NICAM collected a total of 4499 copies of games that were released in Europe. Each individual game is controlled for showing the correct PEGI age rating and content descriptors.

All in all, PEGI is not only a unique cross Europe rating system but it leads also to a unique and daily growing archive of computer games.



## PEGI BOARDS AND COMMITTEES



The Code of Conduct aims to protect minors from exposure to unsuitable interactive software products and ensuring that such products are provided in a responsible manner. In order to fulfil the objectives enumerated in Article 2 of the Code of Conduct, the Code provides for the creation of different Boards and Committees.

### Advisory Board

The Advisory Board is in charge of providing recommendations for the continuing adjustment of the Code of Conduct to social, legal and technological developments. This Board is composed of 12 members appointed for a term of 2 years by the Board of ISFE in consideration of their skills, experience and function (i.e. parent/consumer organisations, child psychology experts, media experts, lawyers expert in European minor protection, academics, a representative from the Enforcement Committee and a representation from ISFE and its administrator).

Name	Country	Affiliation
Susanne Boe	Denmark	Government
Jan Christofferson	Sweden	Government
Ger Connolly	Ireland	Government
David Cooke	UK	Government
Isabelle Falque-Pierrotin	France	Government
Jeffrey Goldstein	NL	Academia
Kristina Hautala-Kajos	Finland	Government
Eva Liestøl	Norway	Government
Spyros Pappas	Greece	Government
Georges Reniers	Belgium	Government
Gustavo Samayoa	Spain	Government
Gabriele Woldan	Austria	Observer
Antonio Xavier	Portugal	Government
Soon to come	Italy	Government

The Advisory Board shall meet at least once a year to consider the need to recommends appropriate implementation tools (e.g. guidelines) of the Code of Conduct and adjustment of this Code, by taking into account and interpreting potential social, legal and technological developments. The Advisory Board has the authority to require from any Member of ISFE all appropriate information in order to oversee the implementation of the Code of Conduct.



**Antonio Xavier, president of the PEGI Advisory Board**

**“PEGI is, without any doubt, a success, but this success must be permanently consolidated and enhanced. We built an industry self regulation system, based on democratic principles of freedom of speech, also followed by the European Union, and we are getting the support of a growing number of countries, worried with the protection of minors and the defence of the basic principles of human dignity. Above all, PEGI is an INFORMATION system about games contents, and it must be kept like this. The greatest PEGI challenge will be, with the help of the Advisory Board, to perfect that information, extend it to on line games and not to yield to those that think that all the evils of humanity are caused by computer games.”**

## Complaints Board

The Complaints Board is made of a pool of independent experts from different countries appointed by ISFE’s Board for a term of 2 years. Members of this pool are appointed in consideration of their skills, experience and function (i.e. parent/consumer organisations, child psychology experts, media experts, lawyers expert in European minor protection, academics).

<u>Name</u>	<u>Country</u>	<u>Affiliation</u>
De Benito Gil Jesus	Spain	Government
Connolly Ger	Ireland	Government
Cumberbatch Guy	UK	Academia
Dietta Lourdes	Spain	Government
Gjerlufsen Lars	Denmark	Government
Goldstein Jeffrey	NL	Academia
Happo Hanna	Finland	Government
Liestøl Eva	Norway	Government
Muir Iain	UK	Government
Pappas Spyros	Greece	Government
Petersson Eva	Sweden	Academia
Quignaux Jean-Pierre	France	Consumer
Reniers Georges	Belgium	Government
Ryland Stig	Norway	Consumer
Walker Annemarie	NL	Consumer
Walker Rosemary	UK	Consumer
Xavier Antonio	Portugal	Government

If a complaint is received from either a publisher or a consumer regarding respectively a pre-release or post-release rating awarded to a product, and it cannot be resolved by ISFE administrator through discussion and explanation, the complainant may formally request the convenience of a Complaint Board to meet and mediate on the issue. In the case, the Secretariat of ISFE selects 3 members of the pool to compose an *ad hoc* Complaint Board and designates one of the 3 members to chair the Board. The selection and designation of the “Chairman” is based on the nature of the complaint and the skills needed to resolve it.

The Secretariat of ISFE shall send a copy of the complaint together with all documents received from the complainant to the members of the Complaints Board and to the defendant against which the complaint is filed. The Complaints Board has the authority to require any additional information in connection with the complaint from both parties and the PEGI System administrator, and to define the time period in which that information has to be provided. If the information required is not submitted within the time period defined, the Complaints Board can render its decision the day after the expiry of the time period.

The Board meet in person if necessary or, if acceptable, consider the facts independently and communicate via email or by phone. A decision by the Complaints Board shall be passed by simple majority of vote. If the Complaints Board concludes that a Publisher have been in breach of any of the requirement of the Code of Conduct, the Complaints Board can ask the Enforcement Committee to take appropriate measures. If the Complaints Board concludes that an entertainment software is not appropriately rated, it can order its re-rating.

Though no legally binding decision may be issued by the Complaints Board, the users of the system, for example publishers are bound to the decisions issued by the Complaints Board by virtue of a Code of Conduct. They will have to perform subsequent corrective actions and will be subject to the sanctions contained within the Code in case of non-compliance.

### **Criteria Committee**

The Criteria Committee is made of representatives of ISFE, NICAM, VSC and of the industry.

This Committee is working on the adjustment of the assessment form and the underlying criteria to take into account technological and content developments, as well as advices from the Advisory Board or circumstances brought to light by the complaints procedure.

### **Legal Committee**

ISFE's voluntary system is running in conjunction with, and subordinate to, existing national laws, whether they prohibit certain content or establish mandatory rating systems. The Legal Committee's role is to apprise ISFE of any changes to national legislation within participating countries that could have an impact on the voluntary age rating system. These changes to national legislation may not be directly associated with the rating of interactive software, but may have an impact on the legal distribution of products with specific content. This could include changes to legislation covering discrimination or the use of illegal weapons or substances for example. The Members are drawn from each country participating in ISFE European rating system, and reports are fed into ISFE as appropriate.

## Chapter 2 The PEGI Administration and Coders



### THE OWNER: ISFE

The interactive software industry, which includes PC and video games, reference and educational works on CD-ROM, is the European content industry's fastest growing sector with a turnover of Euro 6.1 billion in 2005, to be compared to a Euro 22.5 billion world market. It is estimated that, in 2006, the European market will reach Euro 7.25 billion. As a matter of comparison, Interactive Software weighs already as much as the EU's film video market, and significantly more than its box office market.

ISFE (the Interactive Software Federation of Europe) 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 company representing the industry within the 25 Member States plus Norway, Iceland, Switzerland and Liechtenstein. Thirteen major publishers of interactive software and ten interactive software trade associations throughout Europe have joined ISFE.



Located in Brussels, the ISFE secretariat is managed by Patrice Chazerand, secretary general. The first fifteen years of his career were spent with France's foreign ministry, six of which at the French embassy to the United States. In 1989, he took the position of director, public affairs, with AT&T France, in the run up to the opening of France's telecommunications market. In 1999, he moved to Brussels, to establish and run the European office of Viacom, the mother company of Paramount, MTV, CBS, etc. He joined the interactive software industry in 2002 to manage the secretariat of their newly created European federation in Brussels. The ISFE staff also includes David Sweeney providing senior legal counsel, Jürgen Bänisch as Communication Officer and Martine Vandamme as Patrice's assistant.

Following admission of new trade associations, ADESE for Spain, AESVI for Italy, BLISA, for Belgium, MDTS, for Sweden, NISA, for the Netherlands, NMS, for Norway, the Board has been reorganized. It now includes:

John Brunning, SCEE  
Alain Corre, Ubisoft  
Scott Dodkins, Eidos  
Jens-Uwe Intat, Electronic Arts  
Matthew Hill, Nintendo  
Richard Teversham, Microsoft  
Simon Little, Take 2

Patrick Vyncke, BLISA  
Geoffroy Sardin, SELL  
Olaf Wolters, BIU  
Thalita Malago, AESVI  
Per Strömbäck, MDTS  
Alberto Gonzalez-Lorca, ADESE  
Michael Rawlinson, ELSPA

John Brunning, from Sony Computer Entertainment Europe, is the chairman of the Board.

## ISFE's role

- ISFE has been helping the interactive software industry reach its full potential throughout Europe and worldwide by securing effective legislation to protect intellectual property rights, adequate enforcement of such legislation and unrestricted access to markets, in the off-line as well as on-line environment. From the outset, ISFE has been spreading the word on its members' positions regarding the main political and legal initiatives of European and international institutions in fields such as intellectual property, e-commerce, fight against piracy, WTO negotiations, protection of minors and the environment. An enlarged ISFE membership has made for increased lobbying in these areas, together with these specific issues
- Establishing the interactive software industry as a responsible industry by setting up a successful, unique and innovative self-regulation aimed to inform European consumers about the suitability of games based on age recommendations
- Making sure the industry is properly represented at national level throughout the EU
- Fighting against Piracy, including by way of disseminating relevant information and training enforcement officers
- Creating better awareness of the interactive software industry as a key player in the European economy and as a prime source of digital content
- Establishing a source of information for its members and the media on industry data and relevant legislative and technical developments of all kinds through market research on legitimate and pirate sales, press releases and seminars.

## ISFE's Membership

Activision	Microsoft
ADESE (Spain)	Nintendo
AESVI (Italy)	NISVE (the Netherlands)
Atari	NMS Norway
BIU (Germany)	Sony Computer Entertainment Europe
BLISA (Belgium)	SELL (France)
Buena Vista Games	SIEA (Switzerland)
Electronic Arts	Take 2 Interactive Software
ELSPA (UK)	THQ
Eidos	Ubisoft
Konami	Vivendi Universal Game
MDTS (Sweden)	



**THE ADMINISTRATORS: NICAM**

NICAM is the Netherlands Institute for the Classification of Audio-visual Media. It brings together all Dutch public service and commercial broadcasting organizations, 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 2000 to provide an effective and uniform system of classification for all audio-visual media. NICAM draws up classification guidelines, deals with complaints and is the Netherlands' principal knowledge centre when it comes to protecting young people from the detrimental effects of audio-visual media. NICAM aims to provide consumers with information such that it will enable them, on the basis of descriptive information about a film, TV programme or video/DVD, to arrive at a rational decision as to whether or not they can regard the product concerned as unsuitable for young people. This form of information provision is new, supplementing and complementing existing age classifications. NICAM is offering consumers uniform age recommendations plus explanatory information in the form of content descriptors.

NICAM was established at the initiative of the industries referred to above and in response to a directive of the European Commission in which member states are required to take steps to protect minors for harmful audiovisual content.



Wim Bekkers is the director of NICAM

From 1978 until 2000 he was manager of several departments of the NOS – Netherlands Public Broadcasting – as Audience Research and Documentation & Library. In 1998 he was elected vice president of the EBU Group of European Audience Researchers and in 1999 he became the president of this group.

He joined NICAM in 2000 to build and manage the institute.



Maud Stevens is staff member to all PEGI related affairs with NICAM

She has joined NICAM in 2003, with a background in Communications. As NICAM is acting as the Administrator of the PEGI system, this means she serves as a 'help-desk' to all PEGI coders, is responsible for both the public and private

PEGI website, and leads NICAM's examination team which tests the PEGI ratings in the lower age categories.



Arco Gnocchi is staff member to PEGI related consumer affairs with NICAM

He has joined the NICAM organization in March 2006, also with a background in Communications, and computer games in specific. Apart from his professional interest in games, he's a devoted gamer in his personal life too. He is currently assisting

Maud Stevens with her PEGI activities. He mainly deals with PEGI related consumer questions and comments.



#### **THE ADMINISTRATORS: VSC**

The Video Standards Council 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 is the only organisation in the UK that represents the whole of the video and computer games industries and as such is in a unique position to bring the various sectors of the industries together to discuss and resolve matters of public concern.

The VSC membership also covers all sectors of the industries and on the retail side the VSC represents over 10,000 retail outlets across the UK.

In 1994 the VSC joined forces with the Entertainment & Leisure Software Publishers Association to establish the ELSPA system for the voluntary age rating of computer games which are exempt from legal classification under UK law. Since that time until the beginning of 2003 the VSC administered the ELSPA system and rated over 6,000 games.

In 2003 the ELSPA system was superseded by the PEGI system and the VSC now acts as NICAM's agent in the UK where a large percentage of European games publishers are based. It also examines all games applying for a higher rating under the PEGI system (16+ and 18+) to ensure that such games have been correctly rated and have not lost their general exemption from legal classification in the UK. The day to day management of the VSC is carried out by Laurie Hall (Secretary-General) and Peter Darby (Operations Manager).



Laurie is a qualified lawyer with over 35 years experience in the music, video and computer games industries. He has been Secretary-General of the Video Standards Council since 1989. In 1994 he was very involved in the establishment of the ELSPA games rating system in the UK. The VSC administered this system until 2003 when it was superseded by PEGI. In 2001 he became part of the European team responsible for the establishment and launch of PEGI. He is very involved with the joint administration of PEGI along with his colleagues at NICAM.

Peter is a former long serving senior police officer. He joined the Video Standards Council as Operations Manager in 2003 at the same time as PEGI was being launched across Europe. He is responsible for the examination of all 16+ and 18+ games prior to any rating approval and coder training. He has been more recently been involved with PEGI on-line. His ability with and love of computers serves him well in his work.

## PEGI CODERS

Almost 180 publishers have joined the PEGI system already (see full list in Annex 2). The signatories must ensure that all personnel responsible for rating games are registered with NICAM as a 'registered coders'. All registered coders will be 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 publisher and administrator. Therefore Nicam organises regular training sessions in different European countries. These sessions are aimed to keep coders abreast of administrative, technical and procedural issues and new legislative developments and are quite popular among coders throughout Europe.



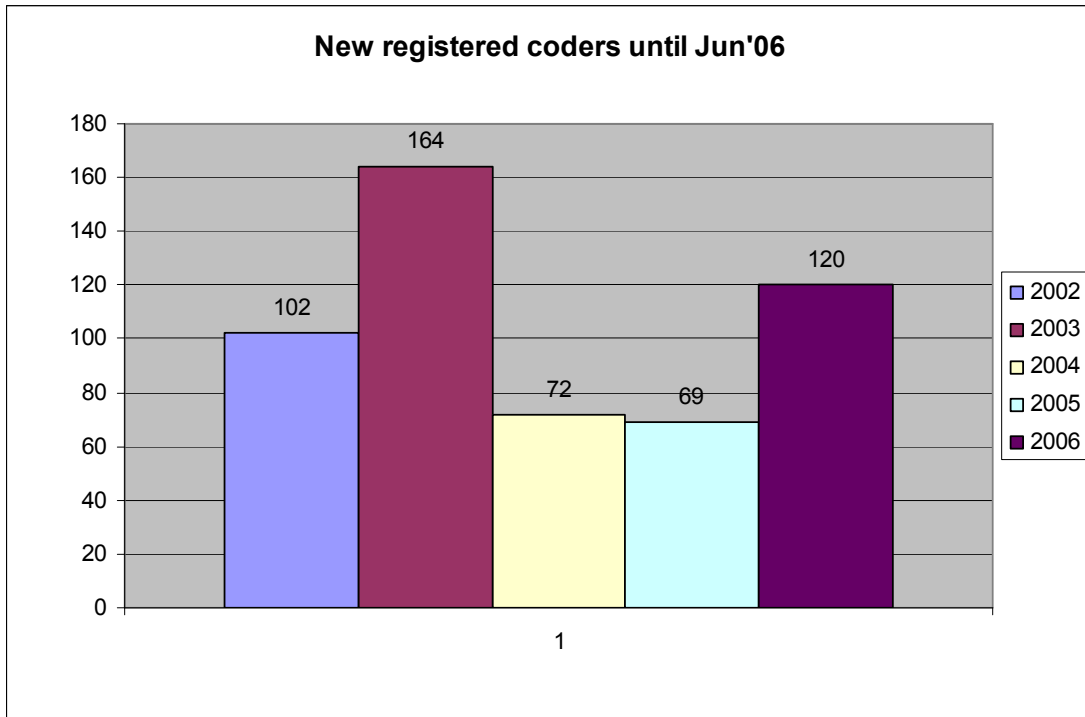


**“I am Fi Ebbs, a Senior Project manager with Vivendi Games within the Localisation Department. I work on coordinating and managing the translation and release of Vivendi Games into many different languages.**

**For the last year I have also had an additional role managing our Age Rating Submission to the PEGI Board. I have had to submit many games this year to them so have built up a detailed knowledge of the processes and procedures. There have been weeks where I seem to have checked the PEGI website hourly as I keep track of the many titles we are submitting. The PEGI system is one of the easiest to use and is very helpful in aiding you towards the correct age rating.**

**The PEGI Support people are always so helpful and shown infinite patience in answering queries or correcting mistakes we have made.**

**Age ratings are such a key part of the overall game that PEGI and all of the different boards are at the front of the work we do on a daily basis. One of the challenges that PEGI faces is the fact that it has to balance the requirements of 26 countries different needs: this can be challenging and we have definitely found that the PEGI questionnaire delivers a stricter rating than some of the other boards. This is an area that PEGI will have to tackle in the future.”**



## **Chapter 3 The PEGI Criteria**

### **SELF-ASSESSMENT FORM**

As a preliminary remark, it should be emphasised that the voluntary age-ratings given under the system relate to the content of the product and its viewing suitability, not its playability or difficulty.

The system uses a self-assessment form which must be completed in order to obtain an age-rating. The form sets out a series of questions with ‘Yes/No’ answers. The form is set out in Annex 3.

All self-assessment forms must be completed by way of an on-line registration site operated by NICAM. The on-line self-assessment forms can only be completed by ‘registered coders’ working for games publishers who have been licensed by ISFE to use the system (see details below).

Questions 1 - 12 (! for update) are designed to establish whether a game is exempt from legal classification in the UK. A ‘Yes’ answer to any of these questions means that the PEGI system cannot apply to the game in the UK and it will have to be legally classified by the BBFC before it can be legally supplied in the UK.

Notwithstanding the fact that a game does require legal classification for UK release the game can however be rated under the PEGI system for release in all other participating countries. In such circumstances the PEGI age-ratings as they appear on packaging used for release in participating countries except the UK must clearly indicate that the game must not be supplied in the UK.

Questions 13 – 36 (! for update) are designed to establish what age-rating a game will be given under the PEGI system.

For all questions there is a help page. The help pages are amended from time to time to deal with new questions or issues that may arise.

Once answers have been completed for the questions you will see the age-rating given and the content descriptors to accompany the age-rating on packaging (see further details below).

### **CRITERIA CHANGES IN 2005-2006**

PEGI has always been proud of itself for being dynamic and flexible to meet new situations and changing circumstances. It is important that PEGI keeps up to date. This is particularly true for the age-rating questionnaire that is fundamental to the correct age rating of games.

The original questions and help pages were established for the launch of PEGI in 2003 by the Criteria Committee after many months of consultation across Europe.

Some changes were implemented at the beginning of 2005 and in the spring of 2006 the Criteria Committee considered a number of further changes. These proposed changes had arisen from comments and suggestions made by the users of the system and the PEGI administrators.

As a result a list of recommended changes was put forward to ISFE for approval that was duly given. The changes deal with the following matters:

### **Gambling**

To begin with the PEGI system did not take gambling into account when age rating a game. Certain problems arose for gambling games in Greece where it is illegal for youngsters to gamble. ISFE gave due consideration to this issue and decided that gambling games should attract an 18+ rating. This change was implemented in early 2005.

The gambling games concerned are those that actually encourage or teach the player to gamble or bet for money in real life. It deals with types of betting or gambling for money that are normally played or carried out in places such as casinos, gambling hall or at race tracks, national laws permitting.

In this respect, it is worth noting that the PEGI Code of conduct spares no pain to flag out that participating in the system is no exemption to applicable laws and regulations. The following provisions in particular make it crystal-clear:

- Article 2: “This industry’s contribution complements existing national laws, regulations and enforcement mechanisms”.

- Article 5 a : “It is understood that the obligation to label products according to the PEGI System, applies only as far as it does not lead to an infringement of future or existing national mandatory (Governmental) rating and labelling systems applicable to interactive software”.

- Article 7.3 § 5 : “The publisher shall ensure that the logo and descriptors are used in accordance with national legal requirements and that, in particular, the logos and descriptors are not used in countries where the product is prohibited or submitted to legal classification”.

It is not concerned with games where gambling or betting is simply part of the general storyline.

Feedback from across Europe during the period after the change was put into effect strongly indicated that although gambling should be taken into account the 18+ rating was far too strict. The Criteria Committee agreed.

Games that teach or encourage gambling will now attract a 12+ rating and a new gambling descriptor for packaging has been devised. In addition games at 16+ and 18+ that teach or encourage gambling will also attract the gambling descriptor provided that they have otherwise been given a 16+ or 18+ for reasons other than gambling.

### **Minor Assault**

The question of violence has always been at the top of the agenda for PEGI. Until the issue of minor assaults arose any realistic violence towards human-like characters attracted at least a 16+ rating.

On occasions this had caused problems for games that contained realistic violence that was very minimal such as a smack or slap and the victim does not show any apparent harm or injury. Under the original criteria this nonetheless meant that the game had to attract a 16+ rating as there was no question in the questionnaire to take it any lower. The only violence permitted at 12+ was unrealistic violence or violence towards fantasy characters.

The new criteria will now permit games containing minor assaults to attract a 12+ rating.

### **Non-detailed and non-realistic violence towards non-detailed human-like characters**

This deals with games that contain depictions that give only a basic representation of a human (stick men or pixilated characters). It does not deal with games where the characters may be small but still detailed enough to be clearly recognisable as humans. Under the original criteria this meant that even if the violence was non-realistic and non-detailed the game would nevertheless attract a 12+ rating. There was no question in the questionnaire to take it any lower.

The new criteria will now permit games containing such violence to attract a 7+ rating.

### **Implied violence**

This is concerned with games 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 that people are being killed or injured and blowing up a tank or shooting down a plane where you know the crew are killed. It also covers smashing into cars or other vehicles where the driver or passenger must have been killed or injured.

Under the original criteria such a game would probably have attracted a 3+ rating as it did not contain any violence as such. It may have attracted a 7+ for being frightening or scary for young children but there was no guarantee that this rating would be given.

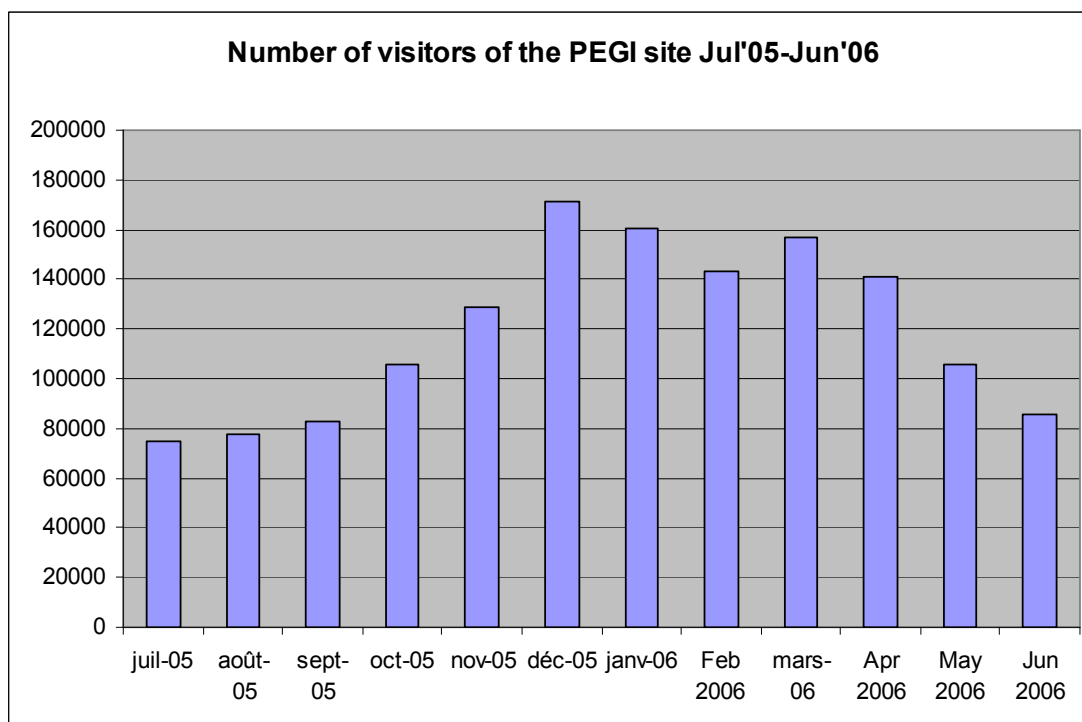
The new criteria will now specify that games containing such implied violence will attract a 7+ rating.

## Chapter 4 Communication and Information to Consumers

### PEGI WEBSITE

From the PEGI website, promoted via the product packaging (displaying the PEGI website url) and participants websites, consumers have access to comprehensive information on the PEGI system, as well as the possibility to raise questions or queries relative to the ratings granted. The website is translated in the following 21 languages allowing EU consumers to have access to the information on PEGI in their own language: Czech, Danish, Dutch, English, Estonian, Finnish, French, German, Greek, Hungarian, Icelandic, Italian, Latvian, Lithuanian, Norwegian, Polish, Portuguese, Slovak, Slovenian, Spanish, Swedish.

### Visitors





**Spontaneous reactions from consumers**

All consumers visiting PEGI’s public website at [www.pegi.info](http://www.pegi.info) have the option to submit one of five different types of online forms, in which they can state any question, comment, or complaint they might have.

The five types of forms from which consumers can choose are:

1. Requests for information on the PEGI system;
2. Comment on the PEGI system;
3. Complaint concerning the advertising of an interactive software product;
4. Complaint related to the rating delivered to an interactive software product, and finally
5. Questions & Comments on the PEGI system.

Consumers who submitted a comment through the [pegi.info](http://www.pegi.info) website or via e-mail receive a custom-made answer from NICAM, the Administrator of the PEGI system.. All consumer forms have been organized by form category and by submission date.

The table below displays the number of all comments received in the period July 2005 until June 2006, split up by form type.

Total amount of forms divided per category July 2005 –June 2006

1. Information on the PEGI system:	111
2. Comments on the PEGI system:	30
3. Complaints concerning the advertising of an interactive software product:	2
4. Complaint related to the rating delivered to an interactive software product:	33
5. Questions & Comments on the PEGI system:	107
6. Miscellaneous, technical questions/comments, misdirected questions	455
<b>Total:</b>	<b>738</b>

December and January are ‘top’ months in terms of numbers of queries, where the summer period is relatively quiet.

***When a consumer speaks...***

AM: What is your name?  
 I: Isabella Pisinger Valeur.  
 AM: How old are you?  
 I: I AM thirteen years old  
 AM: For how many years have you been playing?  
 I: I played some computer gAMES made by my father, just when I started school. They are called *Spøgelse med forkølelse (ghost with a cold)* ,



*Skeletter med kasketter (skeletons wearing caps) and Bellinis bikini.*  
 AM: What do you play now?  
 I: *Sims 2 nightlife* and *World of Warcraft*.  
 AM: What do you like about playing computer gAMES?  
 I: It is different from gAME to gAME. In *World of Warcraft* you can chat – I think that’s kind of fun, and then I

meet all kinds of players I also like the fact that you can "decorate" your character quite a lot, if you do not feel like fighting . In *Sims* I think it is fun to create your own fAMily and "their whole life" if you can put it that way, and it is also quite fun to play an architect.

AM: Do you know that gAMES are labelled according to age?

I: Yes

AM: Can you tell me the age label of *Sims*?

I: 12.

AM: If you look on the back of the cover, you can see some icons. Do you know the meaning of those?

I: Those? The age, and then I AM not sure, what the other icons mean.

AM: They mean that there are violent elements in the gAME, and things that have got to do with sex. Have you experienced any of those things in *Sims*?

I: Yes, you can make them fight, and they can also have "Wuhu" or what you call it, have sex.

AM: Does that bother you?

I: No, not at all. I actually think that it's good that it's there, because it makes it a little more romantic and drAMatic.

AM: Could you imagine that it would be too much for some people?

I: Not any one on my age. Maybe for someone who's younger, but they have made the "wuhu part" pretty innocent

AM: Does it matter to you that this label system exists?

I: Well, I AM over twelve so...but I did think about it a bit when my younger cousin wanted to play it.

AM: Did you tell her not to play it then?

I: No, I just didn't let them fight and make "Wuhu"

AM: So you made sure, that she did not se any of those things?

I: Yes

AM: So what did you do?

I: We made a fAMily, build their house and then we made sure that they made a lot of friends.

### ***Another consumer view***

AM: What is your name?

I: Olivier Mauco

AM: How old are you?

I: I am twenty-five years old

AM: For how many years have you been playing?

I: I first played on a commodore 64, when I was 6 years old, a car races game, then I played on Amstrad CPC, and 486 sx 66. I spent a lot of time in computer games, especially *Sim City*. I get a gameboy when I was about 9 years old; I used to play anywhere, at anytime. Then I get a Super Nintendo, etc... I've been playing for almost 20 years.

AM: What do you play now?

I: My situation is quite special, because I am studying videogames contents for my doctorate studies. I enjoy playing *Pro Evolution Soccer* with friends or Table tennis (xbox 360). I spent a lot of time in *Guild Wars*, but I'm still playing it with (real) friends. I play some FPS, like *Doom 3* (computer), or *Prey* (xbox 360), and *lumines* (psp). I can play a RTS game, like *Battle for middle earth*. The truth is that I choose a game according to my mood and willing.

AM: What do you like about playing computer games?

I: The first thing I have got in mind is "fun". Videogames are an

entertainment. Then I enjoy the trip, in a kind of graphical aesthetic approach, the worlds which are proposed. You can feel emotion, like stress, fear, which is very entertaining. But after spending a long time in a game, especially in MMORPG, it seems to be the competitive environment; it is a way to surpass myself, to accomplish something heroic, great and amazing that I could not do in the real life. Even when I play with friends, I want to beat them, so do they. In other ways I could help some people from my guild, have nice chats. The social dimension is very important in this kind of game.

AM: Do you know that games are labelled according to age?

I: Yes, but I didn't know who labelled them.

AM: Can you tell me the age label of *Sims*?

I: Must be 12, then according to the extension pack, it could change.

AM: If you look on the back of the cover, you can see some icons. Do you know the meaning of those?

I: Yes, I studied them, but the sexual content is not very clear for me (looks more like a game gender)

AM: They mean that there are violent elements in the game, and things that have got to do with sex. Have you experienced any of those things in *Sims*?

I: I didn't spend a lot of time in *Sims*. I agree with sexual contents, but I didn't notice the violence.

AM: Does that bother you?

I: No, if a life simulation game can't integrate violence or sexual contents, it

is no longer a life simulation game. I would like to precise that the violence is only symbolic violence (language), you can't kill *Sims* as you kill an enemy in FPS.

AM: Could you imagine that it would be too much for some people?

I: I don't think so, because the sexual content is very soft, it is very romantic, and not obscene. I think it is more the ideological content that could bother some communities. For example, if your community or religion blames sexual relations, the *Sims* are strictly forbidden. We could say the same thing for a communist who couldn't agree with the consummation ideology.

AM: Does it matter to you that this label system exists?

I: Not at all. It is better to inform than censure. It is obvious that all videogames are not for everyone. But you can't forbid all of them to please only a part of the population. Information is more reliable and effective.

AM: Did you tell her not to play it then?

If I had a child, I would rather protect them from awful scenes. But the best way is to judge yourself. When you educate them, you do this according to your value system. So a son of 11 years old could play *Sims* if I thought I would be able.

AM: So you made sure, that she did not see any of those things?

I: I would have a look at his play, but then I could talk about what he did and what he saw.

## Complaints concerning the advertising of an interactive software product

1 *Date:* 23/06/2006

*Make up of the Ad Hoc Complaint Board (AHCB):*

Iain Muir, chairman (UK)  
Lars Gjerlufsen (Denmark)  
Spyros Pappas (Greece)

*Product concerned:* Trauma Center: under the Knife

*Publisher:* Nintendo of Europe (NoE)

*Brief description of the case:*

Following comments made by a UK-based consumer, NICAM and the publisher has agreed to change the rating from 7+ to 12+ in consideration of bad language being used. The consumer nevertheless wanted the Complaints Board to hear the case.

*Recommendation:*

- A. All PEGI participants will be requested to pay more attention to language-related issues.
- B. Following a decision to change the rating of a game, all PEGI participants will be invited to see to timely correction of rating information in all relevant places such as publishers' sites, offline and online points of sale points of sale, etc.
- C. The PEGI Administrator will exert his best judgment in conducting random checks.

*Follow-up:*

All the above recommendations have been implemented immediately, as per the instructions of the Enforcement Committee.

NB. For a complete grasp of this case, it is worth noting that, upon agreeing to the rating change suggested by the Administrator, i.e. prior to the relevant AHCB being convened, NoE had immediately stopped the packaging of the game software, destroyed all remaining stock that was in the central warehouse and stopped lorries that were already packed with the game. The production of the game came to a complete halt for one week, because NoE waited for the new title sheet to be produced, so that the remaining stock in the warehouse could be repackaged.

2. *Date:* 21/09/2004

*Make up of the Ad Hoc Complaint Board (AHCB):*

Dag Asbjornsen, chairman (Norway)  
Jean-Pierre Quignaux (France)  
Rosemary Walker (UK)

*Product concerned:* Atlantis III The New World

*Publisher:* Dice Multimedia

*Brief description of the case:*

A UK-based consumer suggested a 12+ classification to be more appropriate to this game rated 3+ in consideration of the violence contained

*Recommendation:*

The AHCB concurred with the plaintiff that the game should be rated 12+ as it contains “non graphic violence against humans or animals”. The game also contains mild swearing that also warrants a 12+ for bad language.

*Follow up:*

The AHCB recommendation was fully implemented as per the instructions of the Enforcement Committee.

## PEGI COMMUNICATION CAMPAIGNS

An overview of the communication material with downloadable features and website links can be found on the ISFE homepage: <http://www.isfe-eu.org>

### Belgium and the Netherlands

In June 2006 BLISA launched a new information campaign in joint cooperation with the Dutch national trade associations. The campaign was aimed at parents to inform them of the different aspects of gaming and the ratings of PEGI. A teaser campaign built around the campaign mascot “Kevin” was launched with advertorials in a wide range of free local newspapers.

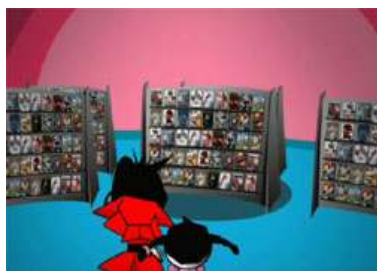


On top of that a new website was developed for the Dutch and French speaking communities in the Benelux countries with in-dept information on gaming, ratings, advice for parents, etc. The site is linked with and accessible through the PEGI website: [www.pegi.info](http://www.pegi.info).

### Iceland

On November 24th the Association of Film Right-holders in Iceland (SMAIS) launched a PEGI awareness campaign in cooperation with SAFT (the EC supported Safer Internet and New media awareness project), the Ministry of Education and The Icelandic Centre for Research and Analysis. The campaign was preceded by a study on the “Usage of computer games among children” and will be followed by a survey on the awareness of the PEGI labels for better assessment of the campaign results. It consists of a press conference, information leaflet, publicity on public transport

busses and TV/cinema advertising. SMAIS and SAFT developed a **special TV clip** for this purpose.



### Denmark

The Media Council has organised a PEGI- Christmas campaign in cooperation with the Danish Multi Media Organisation (MUF) reaching Danish Christmas shoppers. A folder with ‘hands on’ information about the labels and content icons and advice for parents was created, and 5.000 folders were handed out in shops in November and December 2005.



The PEGI-campaign succeeded the conference “Gaming and Gambling” held on the 11<sup>th</sup> of November 2005 in Copenhagen and made in cooperation with Children’s Welfare and The Centre for Compulsive Gambling. The aim was to stir up the public debate about children and young people’s use of computer games and money games in Denmark. The conference addressed both positive and negatives elements of

children's gaming habits and sketched out a picture of the future of games for children and young people

## Spain



The Spanish National Association of Software Distributors and Developers (ADESE) developed in collaboration with private and public organizations a bilingual guide that explains how to make informed buying decisions and to monitor videogame play by minors. 30 000 copies have already been published. In addition they printed in close cooperation with National Institute for Consumer Affairs (I.N.C.) 400 000 copies of a newly designed leaflet which is distributed in its municipal offices to inform consumers.

## Sweden



The Swedish organisation MDTS has an excellent communication policy. In 2004 they introduced the concept of a “Letter of Conduct” in which retailers promise to live up to the recommended age rating.

In 2005-2006 MDTS continued their work and organised the yearly PC and video game tour in shopping malls in Sweden – Game Awards Tour – where consumers can vote on the best games and test play the nominated games, while PEGI T-shirts equipped staff is handing out PEGI badges or flyers to the visitors. They are supporting several consumer events and conferences and have three animated internet clips in development. The clips will be displayed at the homepages of members, retailers, game press etc.

## Switzerland



The Swiss association SIEA just organised a conference in collaboration with national and international adolescent psychologists. They are looking to work closer together with the academic community in Switzerland to run a PEGI related information campaign for parents and teachers. They continued the production of PEGI information brochures and are further implementing their Code of Conduct, with which retailers and video games importers declare to live up to the recommended age ratings.

## United Kingdom



ELSPA launched the Askaboutgames campaign to give head to the growing demands for information on ratings. The campaign was aimed to inform primarily parents, about the age ratings system. They created a whole new website called [www.askaboutgames.com](http://www.askaboutgames.com), and produced an awareness leaflet and dispense that was put into games stores nationwide. ELSPA arranged advertising to promote the campaign and liaised with the DfES (Department for Education and Skills) 'Parents Centre' portal for parents, where they lifted much of the copy from [askaboutgames.com](http://askaboutgames.com) to create a games-specific section of the site.

## **Annex I: Code of conduct for the European interactive software industry regarding age rating labelling, promotion and advertising of interactive software products.**

### **Article 1: SCOPE**

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

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 to this Code.

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 it.

**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, six principal instruments are available:

**3.1. An Advisory Board ('PAB')** including representatives from chief stakeholders (parents, consumers associations, child psychology experts, academics, media experts and the interactive software industry) (see Article 9 below). This body will see to the continuing adjustment of the Code to social, legal and technology developments.

**3.2 A Complaints Board ('PCB')** including, in the same manner as the Advisory Board, representatives from chief stakeholders, (see Article 10 below) and entrusted with the two following tasks:

- handle 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 (see below)

- handle conflicts about the PEGI age ratings themselves including any publisher or consumer complaints about those ratings.

**3.3. An Enforcement Committee ('PEC')** in charge of implementing the recommendations of the Advisory 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 11 below).

**3.4 An Age Rating System ('PEGI': the Pan European Game Information System),** operated by ISFE 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. ISFE retains at all times the right to or rescind or recall any age rating or descriptor assigned to a product.

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

**3.6 A Criteria Committee, ('PCC')** in charge of reviewing the Assessment Form ('Questionnaire') used for determining an age rating on a continuing basis.

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

The ISFE hereby commits to:

**4.1** operate the PEGI System as efficiently as possible.

**4.2** ensure comprehensive, thorough awareness and understanding of the Code and its purpose by all participants in the industry, including publishers 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, 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 ISFE MEMBERS**

The members of ISFE shall:

**5.1** abide by the Code as far as the labelling of products (see Article 7 below) and advertising and promotional activities (see Article 8 below) are concerned. It is understood that the obligation to label products according to the PEGI System, applies only as far as it does not lead to an infringement of future or existing national mandatory (governmental) rating and labelling systems applicable to interactive software.

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

**5.3** assist ISFE in delivering on its own commitments as stated in article 4.



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

The signatories to the Code 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 States' 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 AND LABELLING**

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 publishers and ISFE.

**7.1** Prior to product release, the publishers shall, for each product and format and language version thereof complete an on-line Questionnaire, which assesses the content of the product using the following criteria: violence, sex, discrimination, drugs, fear and bad language.

**7.2** The on-line Questionnaire shall automatically 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 age rating groups shall be divided as follows: +3, +7, +12, +16, +18.

**7.4** The PEGI administrator shall review the on-line Questionnaire according to the following rules:

**7.4.1.** Where the provisional rating is +3 or +7, the PEGI administrator shall approve the age rating by way of a licence to use the logo and descriptors, unless it has reasons to believe that the provisional age rating is misleading, in which case it shall review the product and reassess the rating assigned. Further, the administrator shall carry out regular random viewings on samples of +3 and +7 products.

**7.4.2.** Where the provisional rating is +12, +16 or +18, the PEGI administrator shall view the product in full prior to granting a licence to use the logo and descriptors.

**7.4.3.** In the event that the recommendation on the appropriate age rating is different from the one determined by the submitting publisher, an explanation for the variation shall be provided by the PEGI administrator. If the submitting publisher 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.

**7.4.4.** In due course, the publisher will receive an authorisation 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.

**7.4.5.** All product packaging associated with duly rated games intended for online play shall also include the 'PEGI Online' label as set out in Annex '1'

**7.4.6** Publishers should also ensure that all websites under their control used to distribute games on-line shall only distribute games which fully comply with the PEGI system.

**7.4.7** The logo and descriptors and, where appropriate, the 'PEGI Online' label 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 ISFE for each format.

**7.4.8** The same principles are to apply to the making available to the public through other means but sale, such as rental or lending.

**7.4.9** The publisher shall ensure that the logo and descriptors and 'PEGI Online' label 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.

## **Article 8: ADVERTISING AND PROMOTION**

**8.1** Advertising materials shall, wherever practicable, show the age rating finally 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.

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

**8.3** More generally, the following principles will apply:

- i.** An advertisement shall accurately reflect the nature and content of the product it represents and the rating issued (i.e. an advertisement should not mislead consumers as to the product's true character).
- ii.** An advertisement shall not in any way exploit or a PEGI rating of a product as such a rating is intended as a recommendation only.

**iii.** All advertisements shall be created with a sense of responsibility towards the public.

**iv.** No advertisement shall contain any content that is likely to cause serious or widespread offence to the average consumer targeted.

**v.** Publishers 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.** Publishers 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.** Publishers 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.** Publishers shall inform the public of the existence of any sponsorship agreement and/or the existence of 'product placement' associated with any website. 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.

**8.4** The PEGI System shall be open to magazine publishers 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 9: ADVISORY BOARD ('PAB')**

To ensure the continuing applicability of this Code taking into account potential social, legal and technological developments, an Advisory Board is established to interpret its provisions and to suggest appropriate implementation tools. The Board should be made of:

- *parents/consumer organisations,*
- *child psychology experts,*
- *media experts,*
- *lawyers expert in European minor protection laws,*
- *academics,*
- *a representative from the Enforcement Committee,*
- *a representative from ISFE and the PEGI administrator.*

## **Article 10: 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 ISFE age rating system;
- handling possible rating conflicts between publishers and the administrator of the system, and process age rating complaints by consumers.

The PCB will draw on similar expertise to the PAB.

## **Article 11: 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, possible sanctions on companies infringing the Code, shall be entrusted to the PEC which shall be made up of carefully selected representatives of the industry, as nominated by the ISFE Board and elected by the General Assembly of ISFE.

## **Article 12: INFRINGEMENT, CORRECTIVE ACTION, SANCTIONS AND ARBITRATION**

**12.1** The PEC and the PCB will jointly identify and document possible wrongful application and /or breaches of the Code. Reasonable, non-arbitrary discretion will be used in examining all relevant facts to make a determination of appropriate sanctions.

**12.2** 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

**12.3** Failure to abide by the terms of this Code, including the failure to institute the corrective action referred to at 12.2.above will expose offenders to the imposition of sanctions by the PEC including, but not limited to, the following:

- temporary suspension of product from the PEGI ratings system



- mandatory modification of any associated advertisements both on and off-line,
- permanent disqualification of product from the PEGI ratings system
- a fine of between €1000 and € 500,000 per violation depending on the gravity thereof and the failure to take appropriate remedial action.

**12.4** Violations covered by 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 publisher 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, and, 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 publisher 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.

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

**12.6** Any PEC decision imposing a sanction on a publisher can be referred by that publisher, 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 unless the PEC seeks interim measures from CEPANI pending that decision.

## Annex 2: The PEGI signatories

Nr	Publisher Company	country
1	10tacle Studios AG	Germany
2	Activision UK Ltd	United Kingdom
3	Agetec Europe, Ltd	USA
4	AIM Productions n.v.	Belgium
5	Alten8 ltd	United Kingdom
6	Anuman-Interactive SA	France
7	Aqua Pacific Ltd	United Kingdom
8	Ascaron Entertainment Gmbh	Germany
9	Aspyr Media Europe	United Kingdom
10	Atari	France
11	Beat Games	Germany
12	BHV Software Gmbh & Co. KG	Germany
13	Bigben Interactive (France)	France
14	Blast Entertainment Ltd.	UK
15	Blaze Games Ltd	United Kingdom
16	Blue Label Entertainment Srl	Italy
17	Blue Monkey Studios Inc.	United Kingdom
18	Braingame Publishing GmbH	Germany
19	Brightstar Entertainment Ltd	United Kingdom
20	Buena Vista Games, Inc.	France
21	BWM Software und Vertriebs GmbH	Germany
22	Carré Multimedia	France
23	CD Projekt	Poland
24	CDV Software Entertainment	Germany
25	CE Europe	United Kingdom
26	Cenega Publishing	Czech Republic
27	City Interactive	Poland
28	Codemaster Software Cie Ltd	United Kingdom
29	Conspiracy Entertainment Europe Limited	United Kingdom
30	D3Publisher of Europe ltd (D3P E Ltd)	United Kingdom
31	Davilex Games BV	The Netherlands
32	Digital Bros SPA	Italy
33	Discovery Concepts International Limited	United Kingdom
34	Disky Communications Europe B.V.	The Netherlands
35	DreamCatcher Europe (Ontario)	France
36	DTP Entertainment AG	Germany
37	Dusk2Dawn Interactive Limited	United Kingdom

38	E2 Publishing srl	Italy
39	East Entertainment Media GMBH	Germany
40	Easy Computing NV	Belgium
41	Editorial Planeta DeAgostini S.A.	Spain
42	Educamigos s.l.	Spain
43	Eidos Interactive	United Kingdom
44	Electronic Arts Swiss sarl	United Kingdom
45	Emme SA	France
46	Empire Interactive Europe Ltd	United Kingdom
47	Endforce Ltd	United Kingdom
48	Enemy Technology LLC	USA
49	Enlight Software	China
50	Ertain BV	The Netherlands
51	Excalibur Publishing Limited	United Kingdom
52	F4-Toys	France
53	Filao	France
54	Focus Home Interactive	France
55	Focus Multimedia Limited	United Kingdom
56	France Telecom DAC (Wanadoo)	France
57	Frogster Interactive Pictures AG	Germany
58	Frontline Studios	Poland
59	Funcom	Norway
60	Fusion Labs Ltd.	United Kingdom
61	FX Interactive S.L.	Spain
62	Gabitasoft BVBA	Belgium
63	Gaelco movieles SL	Spain
64	Gameloft S.A.	France
65	GamesRouter Ltd	United Kingdom
66	Ghostlight Ltd.	United Kingdom
67	Giochi Preziosi HK Ltd	China
68	Gizmondo Europe Limited	United Kingdom
69	GMX Media	United Kingdom
70	Gost Publishing	Belgique
71	Greenstreet Software Limited	United Kingdom
72	Groove Media Inc.	Canada
73	GSC Game World	Cyprus
74	Hanaho Games Inc.	USA
75	HD publishing	The Netherlands
76	Hell-Tech	Germany
77	Hip Interactive (LSP)	France
78	Home Entertainment Suppliers Ph. Ltd	Australia
79	Idea Games as	Czech Republic
80	Igniton Entertainment Ltd	United Kingdom

81	In2Games Ltd.	United Kingdom
82	IncaGold plc	United Kingdom
83	Indie Games Productions	France
84	Intenium GmbH	Germany
85	Introversion	United Kingdom
86	ITE Media Aps	Denmark
87	Jakks Pacific / Kids Biz	USA
88	Jelly Bridge Productions Ltd	United Kingdom
89	Jester Interactive	United Kingdom
90	Joanna Grahn	Sweden
91	JoWooD Production Software AG	Austria
92	Just Flight Ltd.	United Kingdom
93	K.E Mathiasen A/S	Denmark
94	Koch Media	United Kingdom
95	Koch Media GmbH	Austria
96	Koei Ltd	United Kingdom
97	Konami Digital Entertainment GmbH	Germany
98	Lasnersoft	France
99	Leader S.p.A.	Italy
100	Legendo Entertainment AB (Iridon)	Sweden
101	Lighthouse Interac. Game Publishing BV	Netherlands
102	Load Inc.	France
103	MadCatz Inc.	USA
104	Majesco Europe Limited	United Kingdom
105	Mastertronic Games Ltd	UK
106	Mattel UK Limited	United Kingdom
107	MC2 France	France
108	Mercury games	United Kingdom
109	Metro3D Europe Ltd	United Kingdom
110	Micro Application	France
111	Microsoft Ireland	Ireland
112	Microtime	United Kingdom
113	Midas Interactive Entertainment Ltd	United Kingdom
114	Midway Games Ltd	United Kingdom
115	Mindscape France S.A.	France
116	Monte Cristo Multimedia SA	France
117	NC Soft Europe Ltd.	United Kingdom
118	Neko entertainment	France
119	Nevrax France	France
120	Nintendo of Europe GmbH	Germany
121	Nobilis	France
122	Nokia Products Limited	USA



123	Novalogic Ltd	United Kingdom
124	Outerlight Ltd	United Kingdom
125	Oxygen Interactive	United Kingdom
126	P.M. Studios S.r.l.	Italy
127	PAN Vision	Sweden
128	Panini Spa	Italy
129	Paradox Entertainment	Sweden
130	Phantagram Co. Ltd	Korea
131	Phoenix Games BV	United Kingdom
132	Phoenix Global Software Limited	United Kingdom
133	PILOT'S Stefan Schäfer GesmbH	Austria
134	Play It Ltd	United Kingdom
135	Playlogic International NV	The Netherlands
136	Positive Gaming Europe AB	Sweden
137	Power Up S.r.l.	Italy
138	Prelusion Games AB	Sweden
139	Project Three Interactive BV	The Netherlands
140	Promotion Software Agentur GMBH	Germany
141	Quality Games Online Ltd.	United Kingdom
142	Red Mile Entertainment	USA
143	Redback Sales Ltd	United Kingdom
144	RedOctane	USA
145	Reef Entertainment Limited	United Kingdom
146	responDESIGN	USA
147	Rising Star Games Ltd	United Kingdom
148	Riverdeep Interactive Learning Limited	Ireland
149	RTL Entreprise Gmbh	Germany
150	Sammy Europe Ltd	United Kingdom
151	SEGA Europe Ltd	United Kingdom
152	SG Diffusion S.A.S.	France
153	Sniper Entertainment	France
154	Sony Computer Entertainment Europe	United Kingdom
155	SouthPeak Interactive	USA
156	Square Enix Ltd	United Kingdom
157	Take 2	United Kingdom
158	Tapwave Inc.	USA
159	TDK	Luxembourg
160	Techland	Poland
161	The Game Creators Ltd	United Kingdom
162	The Toy:Lobster Company Ltd	United Kingdom
163	THQ	United Kingdom
164	Tripwire Interactive LLC	United Kingdom
165	TV4	Sweden

166	Ubisoft EMEA	France
167	Ubisoft NL	The Netherlands
168	Virgin Play S.A.	Spain
169	Virtual Toys S.L.	Spain
170	Vivendi Universal Games	France
171	Wacom Europe GmbH	Germany
172	Walkon	Germany
173	Walt Disney Internet Group	United Kingdom
174	Warner Bros. Interactive Entertainment	USA
175	Whiptail Interactive (Europe) SL	Spain
176	White Park Bay Software	United Kingdom
177	Yoostar Ltd.	United Kingdom
178	Zoo Digital Group Plc	United Kingdom
179	Zuxxez Entertainment AG	Germany

### Annex 3: Assessment Form: The PEGI Questionnaire

Rating	Q. No.	Question	Help Page
		<b>Does the game contain:</b>	
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	6	Moving images that depict human urinary or excretory functions	The meaning is self-explanatory and applies to male or female.
BBFC IFCO	7	Moving images that depict	The descriptions have to show how the offences can be carried out. For example an instruction manual

		techniques likely to be useful in the commission of offences	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.
BBFC IFCO	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. striptease)
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	12	Moving images of any kind that are likely to any extent to stimulate or encourage the commission of	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.

		offences	
BBFC IFCO	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.
BBFC IFCO	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.
BBFC IFCO	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+ section</b>		<b>Does the game contain:</b>	
18+	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).
18+	17	Depictions of apparently motiveless killing or serious injury to multiple numbers of	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

		innocent human-like characters	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).
18+	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.
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	<b>A 'yes' answer to this question 24 will ensure that a language descriptor is used on packaging. If a 'yes'</b>

		(only answer 'yes' to this question if a 'yes' answer has been given to any of questions 16 –23)	<b>answer has not been given to any of questions 16 – 23 do not answer 'yes' to this question 24.</b> 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)	<b>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.</b> This refers to types of betting or gambling for money that is normally played/carried out in casinos, gambling halls, racetracks etc. 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.

16+ section		Does the game contain:	
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	Arcade style action refers mostly to 2D effect depictions where the characters move left and right to

		sporting action showing violence containing blood or gore	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.
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)	<b>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.</b> This refers to types of betting or gambling for money that is normally played/carried out in casinos, gambling halls, racetracks etc. 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+		<b>Does the game</b>	
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section		contain:	
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 minimal 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.
12+	40	Words or activities that amount to obvious sexual innuendo or explicit sexual descriptions or images	This can refer to words or pictures that may 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.

12+	41	Mild swearing and/or offensive language	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
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	This refers to types of betting or gambling for money that is normally played/carried out in casinos, gambling halls, racetracks etc. 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.

7+ section		Does the game contain:	
7+	43	Depictions of non-realistic 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. 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).
7+	44	Depictions of non-detailed and non-realistic violence towards non-detailed human-like characters	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.
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	Pictures or sounds likely to be scary or frightening to	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

		young children	music, entering a haunted house, background screams or rustling in the undergrowth).
7+	47	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.

<b>3+ section</b>		<b>Does the game contain:</b>	
3+	48	Depictions of violence towards cartoon type characters	This means violence towards a cartoon character such as Tom & Jerry. It must be stressed that the emphasis should be on the humorous aspect. Therefore 'the Flintstones' would be cartoon characters but 'Superman' and 'the Hulk' would not, they would be fantasy characters.