



ANNUAL REPORT

2006 - 2007





PEGI

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INTRODUCTION

Dear Reader,

PEGI, the Pan-European Game Information system, has been in operation for four years now.

The following report is an assessment of how this system of guidelines has fared over the past twelve months. It gives evidence of good design well able to withstand the test of time. Built-in flexibility enables PEGI to redefine its classification criteria wherever necessary thereby adapting to meet ever evolving circumstances and technology. Significantly in 2007 the PEGI touchstone questionnaire has been amended twice, the public website has been completely overhauled and the advisory board has held two extraordinary meetings on top of its scheduled annual gathering.

But more than flexible, PEGI has shown resilience under attack. Critics claiming that videogames convey undue violence have been overruled by those passing the more equitable judgment that violence permeates all platforms, interactive or otherwise, and even real life, sadly. Those querying the ability of the PEGI system to issue reliable, easy-to-understand purchase recommendations are outnumbered by the believers in freedom of choice that value the ability of consumers to decide for themselves once properly informed and empowered.

In this context, uptake of the PEGI system is on the increase. The latest survey conducted by Nielsen Interactive Entertainment establishes that across ten countries consumers relying on PEGI icons to identify an appropriate product leapt from 72% in 2004 to 94% in 2007 and acknowledgement of the usefulness of the system overall improved from 49% to 65% over the same period of time.

Finally, PEGI has produced a remarkable offspring, PEGI Online: a labelling system designed to point European parents to online gaming sites provided by operators committed to the protection of minors. These operators have subscribed to a supplement to the PEGI code of conduct: the PEGI online safety code.

As ever, the ISFE secretariat and NICAM will gladly address any questions you feel may not have been dealt with in this report.

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 and industry throughout Europe. As a classification system PEGI supports informed adult choice and does not censor content.



■ CHAPTER 1

The PEGI system and how it functions



CHAPTER 1

The PEGI system and how it functions

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

The PEGI system applies to all interactive software, videogames, computer games, etc., - whatever the format or platform - sold or distributed in the European Economic Area (EEA) by any company subscribing to the standards. The European Union institutions, together with the vast majority of governments in the 27 member states and the EEA, fully support the project.

Today the PEGI system is used in the following **28 European countries:**



The PEGI System is based on a code of conduct (see annex 1), i.e. a set of rules every interactive software publisher using the PEGI System contractually commits to uphold. The code deals with the 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 so as to facilitate informed choice. With around 7500 games rated by the end of September 2007, the PEGI system has proved its ability to rally to its cause the vast majority of publishers supplying games to the European market. Furthermore by giving parents the means and as a consequence the self-

confidence to exercise their responsibility - that of selecting games suitable for the family -, PEGI has, effectively, delivered on its prime objective.

The PEGI system belongs to the Interactive Software Federation of Europe (ISFE) which is headquartered in Belgium. ISFE has contracted the administration of the system to the Netherlands Institute for the Classification of Audiovisual Media (NICAM). A high concentration of videogame publishers are found in the UK, so the Video Standards Council (VSC) acts as NICAM's agent there. The organisation's key areas of activity are explained below.

PAN-EUROPEAN AGE RATING CRITERIA

In order to establish the age rating criteria across Europe a working group reflecting a cross-section of experts and European locations met, between May 2001 and May 2002, to discuss pan-European age rating standards and classification. Work progressed well and the fledgeling rating project developed apace. Part of the process entailed examining a sample of 100 games in both the context of existing national rating schemes and the single pan-European model contemplated. The relevant sub committee found that the results coming out of the existing systems and those generated by the planned system were entirely consistent. They retained the following criteria to underpin the assessment of age classifications.

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

Within each group of criteria, degrees of severity have been set so as to determine the appropriate age suitability of an age category. Each criterion has been placed in the appropriate age category after careful consideration of the following factors:

- Appropriateness of content for the player.
- Current positioning within existing systems throughout Europe.
- Acceptability across Europe.

AGE CATEGORIES

The Five Icons

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



In Portugal the mandatory age categories applicable do differ from those used by PEGI. In order to comply with the current national law of this country a 4+ sticker replaces the 3+ PEGI rating and a 6+ sticker replaces the 7+ PEGI rating.

PEGI ratings by age up to June 2007

Age category	Total	Percentage
3+	3442	48,14%
7+	675	9,44%
12+	1817	25,41%
16+	906	12,67%
18+	310	4,34%
TOTAL	7150	100



CONTENT DESCRIPTORS

Content descriptors are used in conjunction with age-rating logos to explain the main reason(s) for attributing a particular age rating.

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

Each age-rating logo placed on a packaging, with the exception of the 3+ logo is accompanied by a descriptor(s), i.e. bad language, discrimination, drug, fear, sex, violence or gambling.



The newly created PEGI Online label (read more in chapter 4), indicates whether a game can be played online.



Violence

Game contains depictions of violence



Drug

Game refers to or depicts the use of drugs



Bad language

Game contains bad language



Discrimination

Game contains depictions of, or material which may encourage, discrimination



Fear

Game may be frightening or scary for young children



Gambling

Games that encourage or teach gambling



Sex

Game depicts nudity and/or sexual behaviour or sexual references



THE RATING PROCESS STAGES

The rating procedure is as follows:

1. Prior to release of a product, and each version of it, publishers fill in an on-line product assessment form also known as the PEGI questionnaire (See Annex 4).

Compatibility with legal requirements: the first part of the form prompts the publisher to check if his product is subject to legal provisions as required by certain European countries (legal classification, limited distribution or prohibition). If this is the case, the ISFE labelling system must be applied in accordance with local rules in force.

A general exemption from legal classification exists for the UK under the Videorecording Act 1984. In this context PEGI has been specifically designed to help entertainment software publishers evaluate their products to understand whether or not exemption applies. In cases where no exemption entitlement is allowed games must be submitted to the British Board of Film Classification (BBFC) before sale.

2. In all other cases, the publisher completes the second part of the questionnaire relating to the content assessment of a product and 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 determines an age rating, along with content descriptors, to indicate why the entertainment software has been allocated to any specific age category.

4. The age rating groups break down as follows: 3+, 7+, 12+, 16+ and 18+.

5. For provisional ratings of 12+ and over, NICAM (the ISFE administrator) systematically screens the entertainment software.

6. Random viewings are undertaken for 3+ and 7+ rated games, or if NICAM believes there is any doubt over correct completion of a product assessment form.

7. NICAM delivers to the publisher a licence authorising the use of the age-rating logo together with the related content descriptor(s).

8. Once the licence is in hand the publisher may reproduce the appropriate age rating logo and content descriptor(s) for display on the product packaging in accordance with PEGI rules and the code of conduct.



ARCHIVE LIBRARY

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

Since the launch of the PEGI system in April 2003 NICAM has collected over 6000 copies of games released in Europe.

Every game is checked to ensure the correct PEGI age rating and content descriptor(s) is displayed.

In this way PEGI can be seen not only as a unique pan-European rating scheme but also as the driving force behind an exclusive and ever growing archive of computer games.



PEGI BOARDS AND COMMITTEES

The aim of the code of conduct is to protect minors from exposure to unsuitable interactive software products and to ensure that products designed for them are provided in a responsible manner. In order to fulfil the objectives stipulated in article 2 of the code of conduct, there is also provision for the creation of different boards and committees.

Advisory Board

The advisory board is responsible for making recommendations for the continued updating of the code of conduct to ensure social, legal and technological developments are reflected by the PEGI system. Members of the advisory board are appointed for a 2 year term. They are recruited for their skill, experience and field of activity. They are parent/consumer bodies, child psychologists, media specialists, civil servants, academics and legal advisers versed in the protection of minors in Europe.



List of advisory board members:

Name	Country
Christofferson, Jan	Sweden
Connolly, Ger	Ireland
Cooke, David	UK
Cuesta Cambra, Ubaldo	Spain
Falque-Pierrotin, Isabelle	France
Goldstein, Jeffrey	NL
Hautala-Kajos, Kristina	Finland
Hepsoe, Thomas	Norway
Lew-Starowicz, Rafal	Poland
Pappas, Spyros	Greece
Reniers, Georges	Belgium
Rosenstingl, Herbert	Austria
Selloni, Cristina	Italy
Thorhauge, Anne Mette	Denmark
Xavier, Antonio	Portugal

The advisory board meets at least once a year to consider the need for timely revisions to the code of conduct. Its recommendations take into account and interpret potential social, legal and technological developments. The advisory board may, in the execution of its mandate to oversee the implementation of the code of conduct, require any PEGI member to submit complete and appropriate information.



Antonio Xavier, chairman of the PEGI Advisory Board

“Pushing the PEGI information system onwards to further levels of refinement, expanding the system of reference to include online games and convincing individuals who feel videogames to be the root of all evil of their mistake, were, I wrote in last year’s annual report, the issues I anticipated would be PEGI’s future challenges. The year 2007 proved those predictions right.

On the positive side, is the implementation of the PEGI Online system.

Politicians, on the other hand, have tried to exploit the industry’s launch of some especially violent games to create the notion of a need for urgent action to protect minors; this despite PEGI’s recognised role as Europe’s reference in this matter.

The Advisory Board addressed all these matters responding to them fully and promptly at meetings that took place in Rome, Brussels and Dublin.

The upshot? It is safe to say that PEGI is dynamic and in good shape!”

Complaints Board

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

List of Complaints Board members:

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

Complaints Procedure

Should a complaint be received from a publisher or a consumer regarding a rating attributed to a product, and no satisfactory settlement can be reached by the ISFE administrator through discussion, explanation or negotiation, the plaintiff may formally request the complaints board to mediate. The ISFE secretariat then selects three members from the board's pool to form an ad hoc complaint board (AHCB) designating one of the three as chair. The AHCB is selected according to the nature of the complaint and the skills required to resolve it.

Next copies of the complaint and all relevant documents received from the plaintiff are sent to the members of the complaints board and the defendant. The complaints board may require any additional information relevant to the complaint to be submitted by any of the parties concerned, (i.e. the plaintiff, the defendant or the PEGI system administrator).

The board meets in person if necessary or, if acceptable, considers the facts individually and confers via email or telephone. Decisions by the complaints board are passed by simple majority vote. If the board concludes that a publisher is in breach of any part of the code of conduct, it has the authority to instruct the enforcement committee to take appropriate measures. If the board concludes an entertainment software product has been inappropriately rated, it can order a re-rating.

Subscribers to the PEGI system, e.g. publishers, are bound by decisions taken by the complaints board by virtue of the code of conduct. Consequently subscribers find themselves under obligation to carry out any corrective actions required of them and, in cases of non-compliance, are subject to sanctions as laid out by the code.

Please find the complete list of complaints dealt with between September 2004 and October 2007 in Annex 5



Criteria Committee

The criteria committee is made up of representatives from ISFE, NICAM, VSC and the industry. It works on adapting the product assessment form (PEGI questionnaire) and the underlying criteria to take into account technological and content development recommendations made by the advisory board or circumstances brought to light by the complaints procedure.

Legal Committee

PEGI being a voluntary system it runs in conjunction with, and is 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 that participates in PEGI, and reports are fed into ISFE as appropriate.

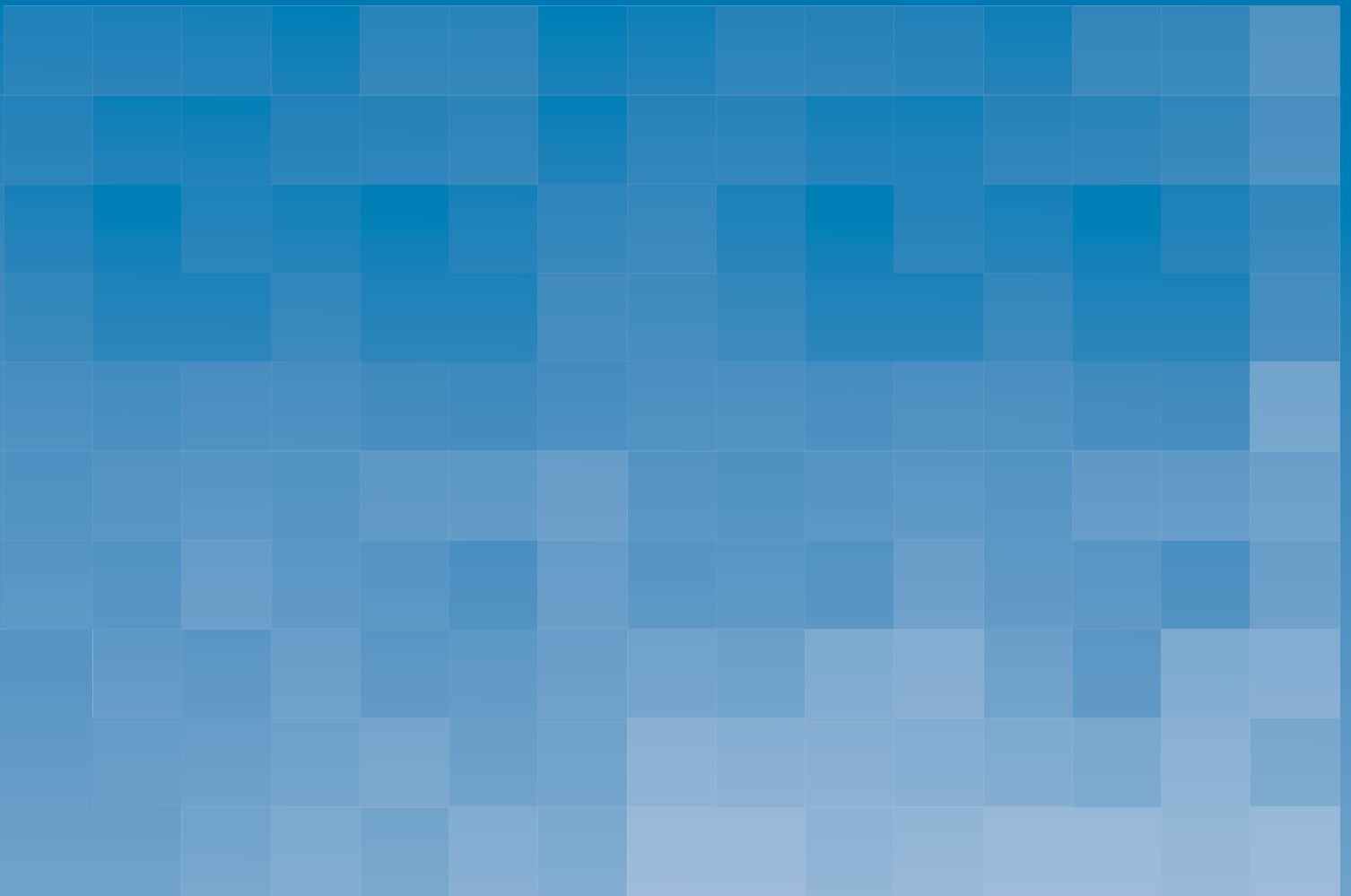
Enforcement Committee

The enforcement committee is charged with implementing the recommendations of the advisory board and, more generally, of ensuring the enforcement of the provisions of the PEGI code of conduct, including conclusion of the complaints board. The enforcement committee is made up of ten members, five of which are publishers, and five of which are chosen from the advisory board. Members of the enforcement committee are elected for a period of four years.

See the code of conduct page 40 for further details on the PEGI committees



PEGI





■ **CHAPTER 2**
PEGI Administration and Coders



CHAPTER 2

PEGI Administration and Coders

THE OWNER: ISFE

The Interactive Software Federation of Europe (ISFE) was established in 1998 to represent the interests of the interactive software sector with regard to the European Union and international institutions. Initially founded by the national interactive software trade associations in the UK, France, Germany and the Netherlands, ISFE today represents the industry within the 27 Member States plus Norway, Iceland, Switzerland and Liechtenstein. Today, ISFE membership comprises 13 major publishers of interactive software and 13 interactive software trade associations throughout Europe. The ISFE secretariat is located in Brussels and managed by Patrice Chazerand who is secretary general.

Patrice and his team an overview :



Patrice Chazerand: Secretary General

The first fifteen years of Patrice Chazerand's career were spent in France's foreign ministry, six of which at the French embassy to the United States in Washington. In 1989, in the run up to the opening of France's telecommunications market, Patrice took the position of director for public affairs with AT&T, France. In 1999 he moved to Brussels to establish and run the European office of Viacom, mother company of Paramount, MTV, CBS, etc. He joined the interactive software industry in 2002 to manage the secretariat of the sector's newly created European federation in Brussels.



David Sweeney: Senior Counsel

David Sweeney started working life as a professional musician and, after experiencing the entertainment industry at first hand, decided to go to university to study jurisprudence and psychology. David went on to qualify as a barrister and practiced law in Dublin and London. Specialising as an entertainment lawyer David then served as European general counsel for the music and cinema industries during the 1990's and became Vivendi Universal's EU affairs lobbyist in 2000. David has been ISFE's senior counsel since 2003.



Jürgen Bänisch: European Affairs Manager

Jürgen Bänisch is in charge of EU affairs at ISFE. He is responsible for the development of the communication and policy strategy and the management of European projects. Jürgen currently heads coordination and implementation of the EU funded PEGI Online project.

Jürgen is Belgian. After graduating in History, he studied European Politics at the Catholic University of Leuven. He previously worked for EAMTM, another European industry federation, and IP-Globalnet, a large international communications company.



Katja Mader: Marketing Manager

Katja Mader has been marketing manager for ISFE since March 2007. She is responsible for defining and implementing the marketing and communication strategy for the federation.

Katja has a degree in business administration from Vienna University of Economics and Business Administration, in addition she studied public relations and marketing at Miami University in Ohio in the United States.

Prior to joining ISFE, Katja worked for Creo (today Kodak), a multinational high tech company, where she successfully developed and led the European marketing communication team for more than 8 years.



Catherine Geroms: Games and Education

Catherine Geeroms has been responsible for games and education projects at ISFE since September 2007. She holds a diploma in information and communication sciences (UCL – Université Catholique de Louvain, Belgium) and is specialised in media literacy.

Before joining ISFE, Catherine worked on the Mediapro project, a European venture aimed at researching media competence and the appropriation of new digital media by children and young adults in Europe. Catherine has also managed several media literacy projects initiated by ACMJ, a Belgian non-profit organization.



Martine Vandamme: Personal Assistant to Patrice Chazerand

After working 12 years in the European affairs office of a major pharmaceutical company Martine joined the ISFE team as personal assistant to the secretary general in September 2006. She follows up on all financial matters relating to the PEGI system in Brussels.

ISFE's role

ISFE helps the interactive software industry to achieve its full potential in Europe and the markets beyond. In a fast changing society the industry needs to be active on all fronts; it follows that the part played by ISFE is an important one.

It ensures the strongest possible voice for the industry in the development of policy, legislation and regulations so that priorities like protection of intellectual property rights, adequate law enforcement and unrestricted market access are secured both in off-line and on-line environments. The ISFE attributes its efficacy to the ability to swiftly communicate members' positions on political and legal initiatives emanating from European and international institutions. Intellectual property, e-commerce, piracy, WTO classification, protection of minors and the environment are but some of the domains the federation deals with. Now an expanded membership is creating the need for increased lobbying activity in these and other specific areas and the ISFE is called upon to:

- Establish the interactive software industry as an example by setting up a successful, unique and innovative self-regulation system aimed at informing European consumers about the suitability of games based on age recommendations.
- Ensure the industry is properly represented at national level throughout the EU.
- Combat piracy by all means including the dissemination of relevant information and the training of enforcement officers.
- Enhance awareness of the interactive software industry as a key player in Europe's economy and as a prime source of digital content.
- Establish a repository of information for members and the media that encompasses industry data, relevant legislative and technical developments of all kinds, market research on legitimate and pirate sales, press releases and seminars.



Jens-Uwe Intat, is the chairman of the ISFE board. He is a senior vice president at EA Europe (Electronic Arts) where currently he has overall responsibility for sales and distribution across Europe. Prior to this post he was vice president and managing director for the central European region, responsible for German speaking countries -Austria, Germany,

Switzerland- as well as as for Poland, Hungary and the Czech Republic. Dr. Intat graduated from the University of St. Gallen, Switzerland, as an industrial engineer.

Members of the ISFE board are:

Braille, Thierry - The Walt Disney Company
Dodkins, Scott - Eidos
Fornay, Georges - SCEE
Hill, Matthew - Nintendo
Intat, Jens-Uwe - Electronic Arts
Little, Simon - Take 2
Teversham, Richard - Microsoft
Hoogendoorn, Henk - BLISA (Belgium, Luxembourg)
Sardin, Geoffroy - SELL (France)
Wolters, Olaf - BIU (Germany)
Malago, Thalita - AESVI (Italy)
Gonzalez-Lorca, Alberto - ADESE (Spain)
Strömbäck, Per - MDTS (Sweden)
Rawlinson, Michael - ELSPA (UK)

ISFE's Membership



SONY



THE ADMINISTRATOR: NICAM

NICAM is the Netherlands Institute for the Classification of Audio-visual Media. It brings together all Dutch public service and commercial broadcasting organisations, computer game 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 it through their membership of the advisory committee or the independent complaints and appeals boards.

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

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



Wim Bekkers is the director of NICAM. From 1978 to 2000 he managed several departments at the Netherlands Public Broadcasting (NOS): audience research, documentation and the library. In 1998 he was elected vice president of the European Broadcasting Union's group of European audience researchers and went on to preside it in 1999. He joined NICAM in 2000 to establish and run the institute.



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



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



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



THE ADMINISTRATOR: VSC

The VSC is NICAM's agent in the UK.

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 those high standards within the computer games industry.

The VSC membership covers all sectors of the business and on the retail side 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 that are exempt from legal classification under UK law. Since then up to the beginning of 2003 the VSC has 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 examines all games applying for a 16+ and 18+ rating under the PEGI system to ensure such games have been correctly rated and do not need to apply to the British Board of Film Classification (BBFC) for legal classification in the UK (cf: Rating Process Stages point 1 § 3). The day to day management of the VSC is carried out by Laurie Hall (secretary general) and Peter Darby (operations manager).



Laurie Hall

Laurie Hall 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 closely involved in the establishment of the ELSPA games rating system in the UK. The VSC administered this system

until 2003 when it was replaced by PEGI. In 2001 Laurie became part of the European team responsible for PEGI's establishment and launch. He is intimately involved with the joint administration of PEGI along with his colleagues at NICAM.



Peter Darby

Peter Darby is a former long serving senior police officer. He joined the Video Standards Council as Operations Manager in 2003 at the time PEGI was being launched across Europe. He is responsible for the examination of all 16+ and 18+ games prior to any rating approval as well as for running the coder training. More

recently he has also been involved with PEGI Online.



PEGI CODERS

As of June 2007 more than 230 publishers had joined the PEGI system (see full list in annex 3). Signatories must ensure that all personnel responsible for rating games are registered with NICAM as 'registered coders'. All registered coders are given a unique access code to enable them to use the on-line registration site. They are directly responsible for submitting video games and related media for classification and constitute an important link between the publisher and the administrator. Regular training sessions in different European countries are organized by NICAM in order to keep coders up to date on administrative, technical and procedural issues as well as new legislative developments.

A coder working with PEGI on a daily basis explains:



"I'm Greg Ward, a group program manager within Microsoft Game Studios, Ireland. The team I manage is in charge of localising Microsoft games for the European market for Xbox 360 and Microsoft Windows.

Part of the complex nature of releasing games into the European market is ensuring that the content played by the end user is rated correctly for its specific country. In line with PEGI guidelines this includes proper indication of the age rating on packaging, as well as in the game itself, if it supports the parental control settings. During the entire game rating process my team works closely with NICAM to ensure that all the necessary information is given and that each title is rated accordingly.

At Microsoft Game Studios, Ireland, we handle up to thirty games requiring PEGI ratings per year. This allows us to build up extensive knowledge and expertise of the rating system.

What we like about NICAM is the timely execution of the rating, something that is essential in the games development business. The age rating submission process is now a key part of the game production life-cycle and the challenge for game developers/publishers is to determine the optimal time at which to submit a game to NICAM for the PEGI rating, taking into consideration the level of completion that the game content has reached, as well as its launch date.

I believe that, as the market for video games continues to grow, PEGI's role, which is in essence assuring a consistent rating system for all customers throughout Europe, will become more and more important."





■ **CHAPTER 3**
PEGI in the Nielsen Survey



CHAPTER 3

PEGI in the Nielsen Survey

PEGI features in the annual study which Nielsen Interactive Entertainment, a worldwide reference in audience measurement information services, is commissioned by the ISFE to execute.

The latest Nielsen survey on video gamers in the EU demonstrates that, four years after the scheme began, PEGI's age rating symbols have already virtually achieved the status of universal recognition and that the ratings system is felt to be broadly useful when purchasing games.

The work's general findings show that gaming now accounts for a significant proportion of leisure time when placed in the context of wider media and entertainment consumption,

cementing its status as a mainstream media option. Viewed from this broader perspective the universal recognition status of the PEGI age rating system is given all the more substance.

Naturally this is a young undertaking, new projects are still being rolled out and work to raise public awareness in certain areas has yet to be accomplished, as testified by excerpts of the report below.

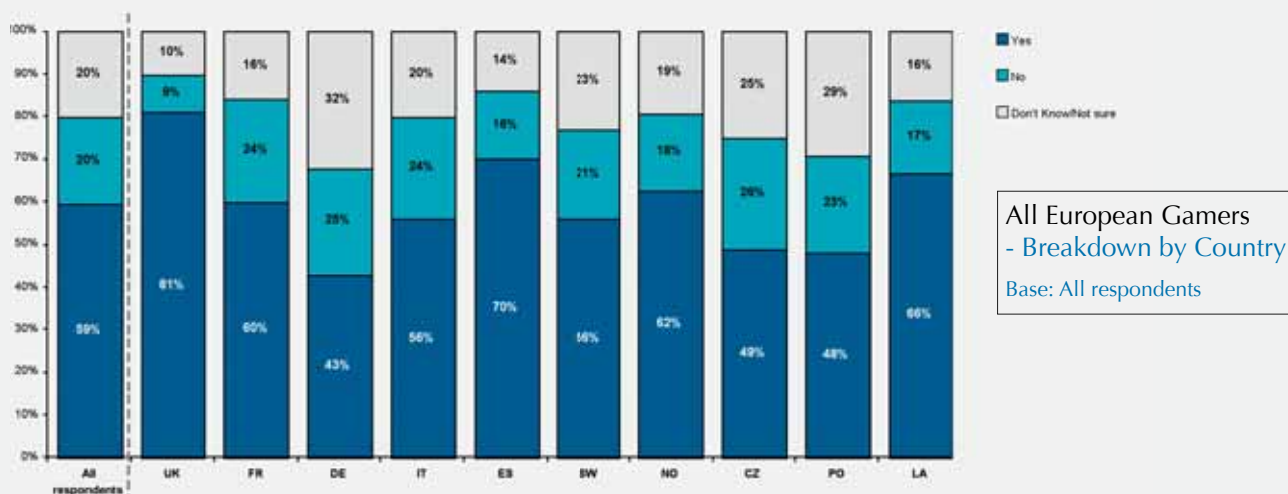
The inquiry was conducted in ten countries with a sample of 400 respondents per country aged between 16 and 39. (To read full details go to the ISFE website: www.isfe.eu).

- ▣ Six in ten European gamers claim to be aware of a European age rating system for video games,
 - Awareness peaks in the UK, and among males and heavy gamers.
- ▣ When prompted with the PEGI age rating symbols, recognition is near universal:
 - A third of the sample questioned claim they find the symbols useful when deciding whether to purchase a video game.
 - Parents in particular appear to give weight to the system, with half of the sample declaring they find it helpful.
- ▣ While the age rating symbols are well known, European gamers are less familiar with the descriptors for bad language, violence and fear (just under half):
 - Again heavy gamers are more likely to recognise the symbols, however, it is important to note that among parents only four in ten remember them.
 - The symbols appear to be relatively ambiguous, with half the sample finding them unclear, while just two in ten understand their meaning.
 - Consistent with the low levels of familiarity and understanding, only three in ten feel the symbols are a useful tool when purchasing a game for a child.
- ▣ Awareness of the PEGI website is limited (just over one in ten), with teens and heavy gamers more likely to have heard about it.
- ▣ Relatively few (one in ten) European gamers claim to be familiar with the process of filing a complaint if they disagree with a rating.



AWARENESS OF THE AGE RATING SYSTEM

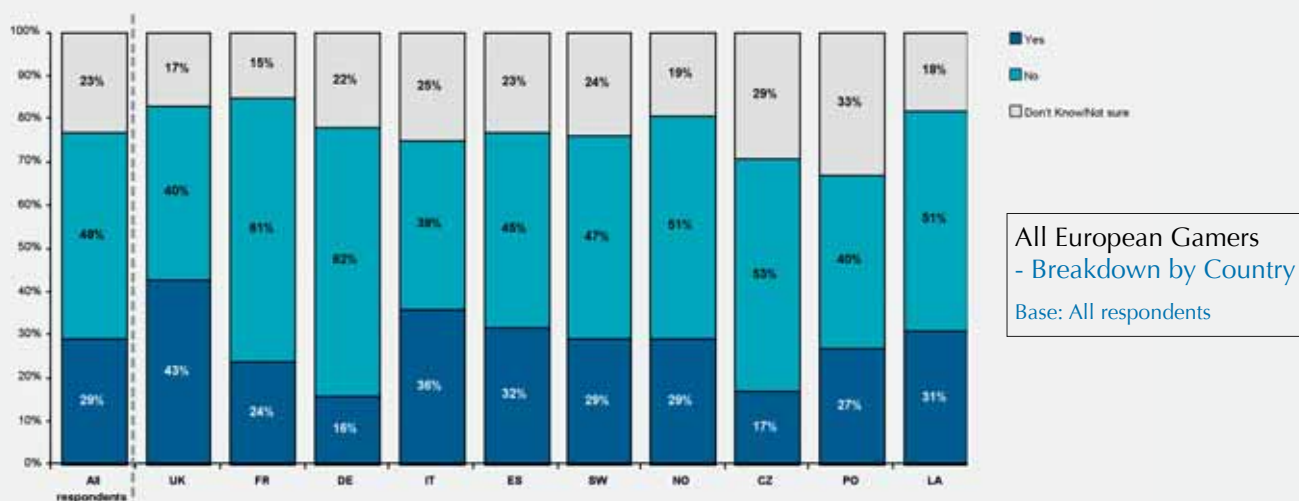
As I am sure you know, DVDs and videos have age rating applied to them. Are you aware, or have you heard of a European age rating system for video games?



Six in ten (59%) respondents claim to be aware of a European age rating system for video games, while 20% feel they are unaware of any such system, and 20% are unsure. Awareness is highest in the UK, standing at 81%, whilst falling among respondents in Germany, the Czech Republic and Poland (48%-49%).

Demographically, awareness is driven by males (62% vs. 47% among females), and also skewed towards handheld owners (65% vs. 60%-61% among PC and console owners).

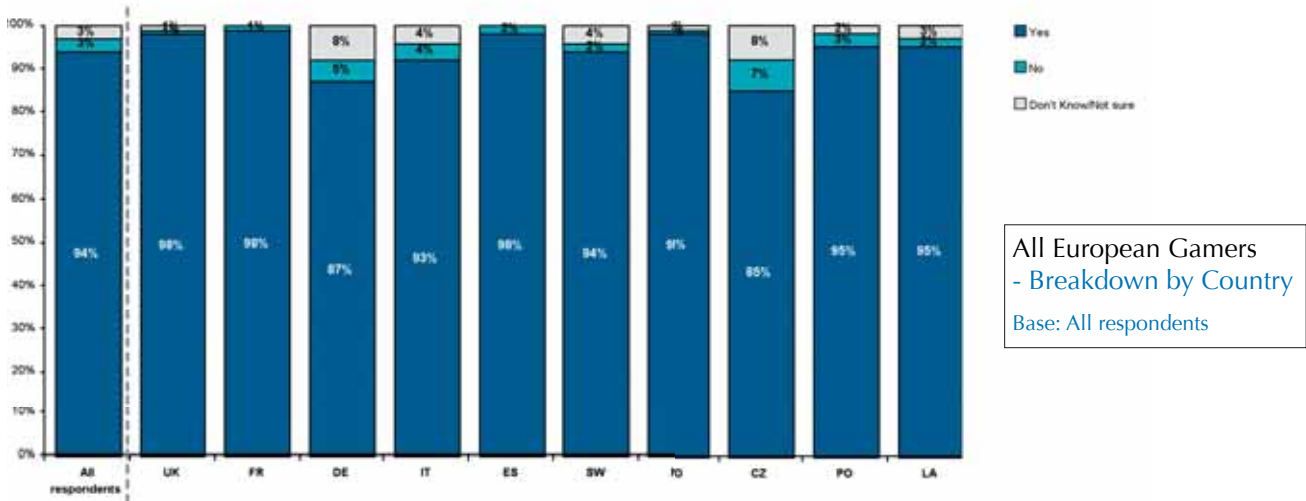
Are you aware, or have you heard of, an age rating system for video games called PEGI or PAN-European Game Information?



In comparison, knowledge of the name PEGI is much lower, with three in ten (29%) claiming to be familiar with it, while half (48%) feel they have not heard of PEGI.

In line with awareness of an age rating system overall, familiarity with PEGI is highest in the UK (43%), and among males (31% vs. 20% among females), handheld owners (37%) and heavy gamers (36%).

Are you aware or have you ever seen the following symbols?

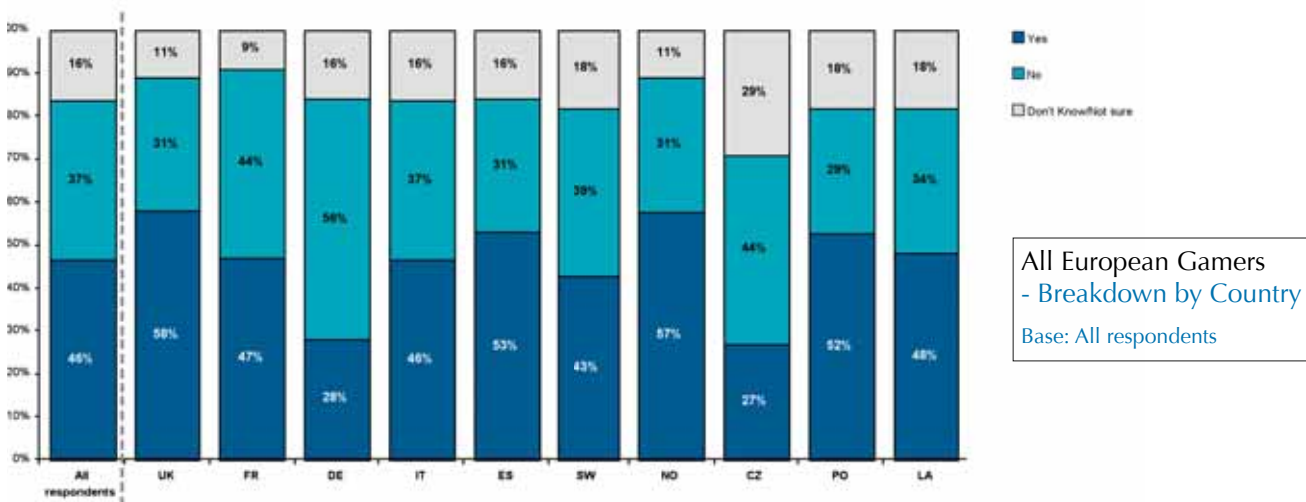


In contrast, when prompted with the PEGI symbols, recognition is near universal (94%), demonstrating that while the visual marks of the PEGI system are well known, respondents are less familiar with the actual name of the age ratings system.

While recall of the symbols reaches in excess of nine out of ten (93%-98%) in the majority of countries, awareness is slightly lower in Germany (87%) and the Czech Republic (85%).

AWARENESS OF THE PEGI DESCRIPTORS FOR VIOLENCE, BAD LANGUAGE AND FEAR

Are you aware or have you seen the following symbols?

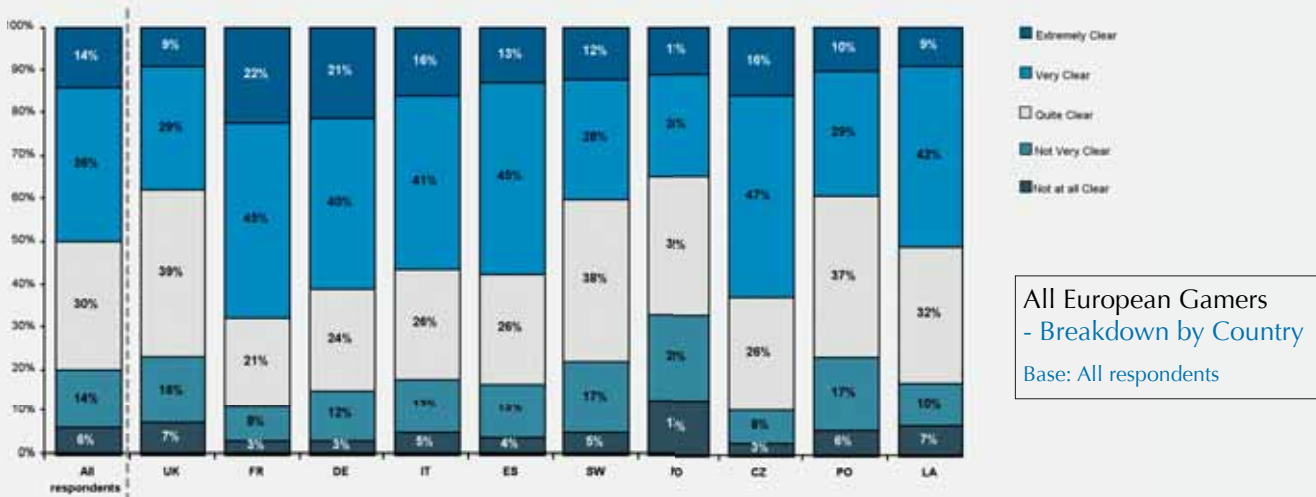


While recognition of the age rating symbols is near universal, familiarity with the descriptors for violence, bad language and fear is lower, with just under half (46%) claiming to have seen them previously. Again, recall peaks among respondents in the UK (58%), but falls among those in Germany (28%) and the Czech Republic (27%).

Heavy gamers (55%), handheld owners (56%), and respondents aged 16 to 19 (59%) are significantly more likely to remember the descriptors. However recall among parents only reaches 40%.

MEANING OF THE PEGI DESCRIPTORS

Thinking about whether it is clear what these symbols mean, on a scale of 1 to 5 where 1 is extremely clear, and 5 is not at all clear, how clear is the meaning of these symbols?



Overall, the majority of respondents feel that the meaning of the descriptors for violence, bad language and fear is unclear, with 50% deeming them either “not very clear” or “not at all clear”, while a much lower 20% feel it is clear to some extent (“extremely clear” plus “very clear”).

Respondents in France (67% “not very clear” plus “not at all clear”), the Czech Republic (63%) and Germany (61%) are the most likely to find the symbols ambiguous, while respondents in Norway are the more likely to find them understandable (33% “extremely clear” plus “very clear”).



PEGI



■ CHAPTER 4

PEGI Online - a new addition to the PEGI system



CHAPTER 4

PEGI Online - a new addition to the PEGI system

PEGI Online is a new addition to the PEGI system. Its purpose is to give young people in Europe better protection against unsuitable gaming content and to help parents understand the risks and harmful potential within this environment.

PEGI Online is based on four cornerstones:

- the PEGI Online safety code and framework contract
- the PEGI Online label which will be displayed by holders of a licence
- a dedicated website for applicants and for the general public
- an independent administration, advice and dispute settlement process



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

The main provisions of the POSC are:

Age-rated game content

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

Appropriate reporting mechanisms

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

Removal of inappropriate content

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

A coherent privacy policy

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

Community standards for online subscribers

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

A responsible advertisement policy

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

The PEGI Online label will appear on the packaging of the game if sold on a CD/DVD or on the game website itself.

The Label will show whether the game can be played online, and also whether the particular game or site is under the control of an operator who cares about protecting young people.

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

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

An online game is defined as a digital game that uses a live network connection in order to be played. This includes not only games played on the Internet, but also those played online through consoles, across mobile phones or via peer-to-peer networks.

Game styles and genres change rapidly so it is hard to be precise but currently there are four main types. **Browser games** are online versions of classic arcade, board or digital games. They are usually free and often available on websites and gaming portals supported by advertising. **Advergaming** are designed to promote a particular product, company or political perspective. **Network games** are usually played online with a PC, but increasingly players are using gaming consoles with Internet access.

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

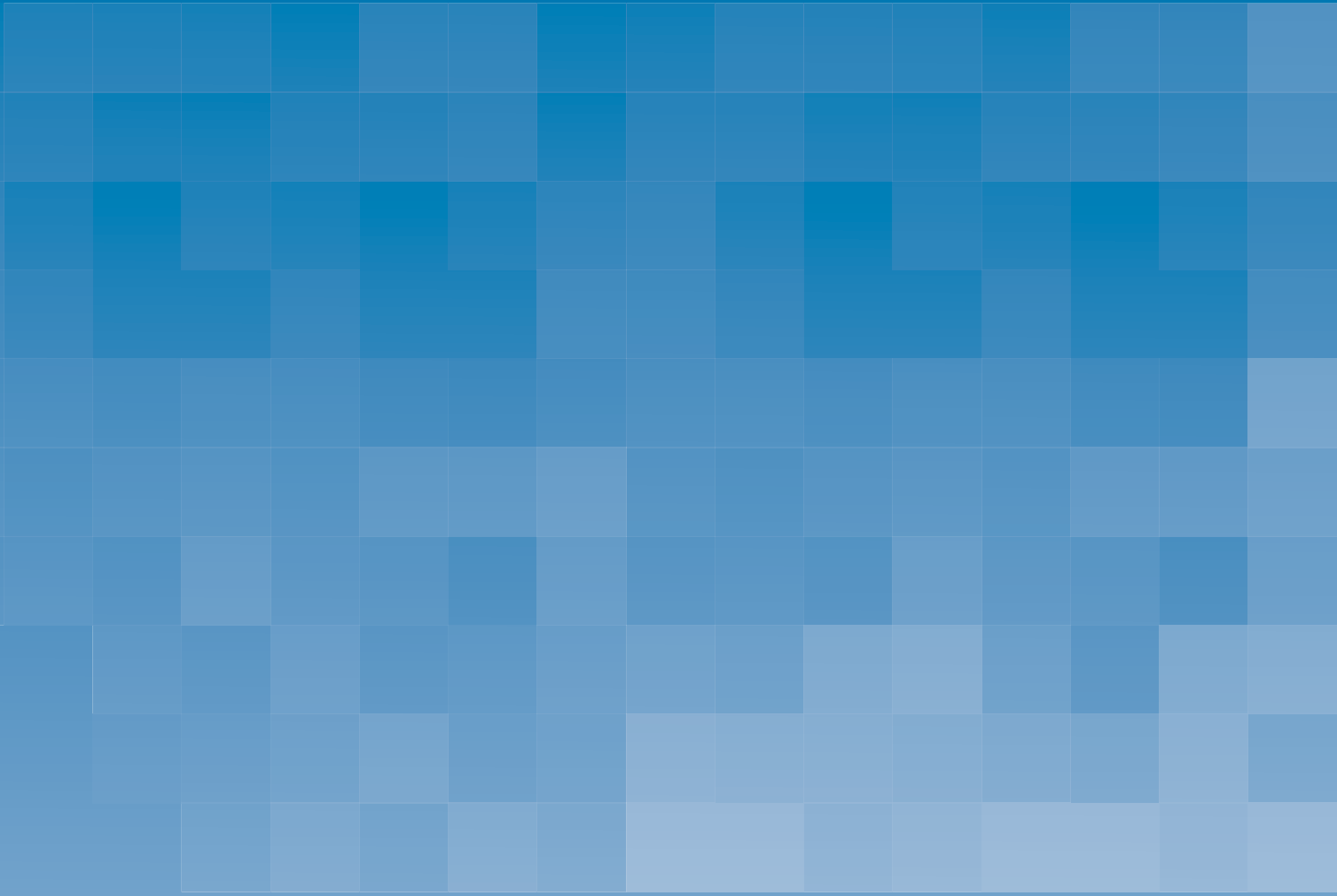
Since online games do often support virtual communities, players can be exposed to the risks associated with real-time interaction with unknown fellow players.

Such risks include:

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



PEGI





■ CHAPTER 5

PEGI Communication tools and activities



CHAPTER 5 PEGI Communication tools and activities

PEGI WEBSITES

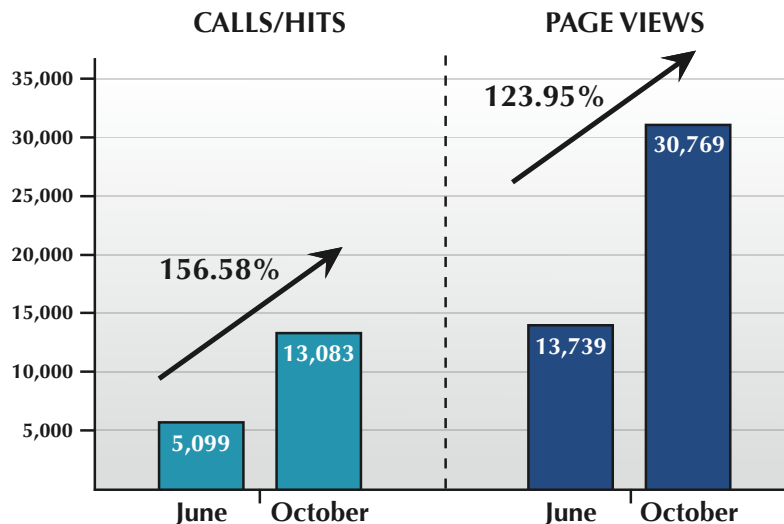


In early 2007 the PEGI **www.pegi.info** site was given a complete make-over and at the same time the PEGI Online website, **www.pegionline.eu**, was launched. Both platforms provide a wealth of information on the PEGI system; the age ratings, the icons that go with them, the types of games that exist and the list of games registered under PEGI.

The virtual sites send back important messages to their owners as well as providing information to their membership and the public. High-precision monitoring technology gathers data that can give valuable insight into how a venture is actually faring, i.e. how visitors use a site, the pages they select and read and much more. In this case analysis of the data offers PEGI and the ISFE detailed knowledge it needs to maintain a site that is current, responsive to the different cultural demands and that brings PEGI wider renown. Here is a brief overview of what the PEGI online web site statistics tell us so far.

Analysis of visitor trends demonstrates that the PEGI Online web site has got off to an excellent start since its launch earlier in the year. By October monthly surfer statistics showed a total of 13,083 calls or hits compared with an initial 5,099 in June - an increase of 156.58%. Taking the same two months and examining the number of pages read, October peaks again with 30,769 pages, 123.95% up on the 13,739 recorded in June. Statistics for each of the different language pages tell a similar story and as the site matures a greater variety of data sources will emerge.

From these trends it seems safe to say roll-out has been a success. The PEGI Online web site is proving to be a versatile, user-friendly medium sensitive to cultural nuances. It is a state-of-the-art sounding-board through which to fact find, the better to anticipate the needs of target audiences. In the campaign to spread recognition of the PEGI system here is another battle the team is winning



PEGI's NEWSLETTER: a new look and feel



During financial year 2007, several editions of the PEGI newsletter were circulated to a target audience of around 400 recipients interested in the gaming sector. They ranged from industry experts, academics, partners at the European Commission and the Parliament, members of the ISFE board and PEGI's constituent bodies. With issue N° 14 of the newsletter a new and fresh look, echoing the design on PEGI's websites was rolled out enhancing the user-friendliness of the organization's information.

PEGI BANNER

PEGI banners, giving an overview of PEGI and PEGI Online have been on display at a number of events around Europe during the second half of the financial year and are available to any individual or organisation wishing to help spread the word on the organisation's work.



PEGI ONLINE FOLDER

The PEGI Online folder is an ideal tool with which to explain, in simple terms, what PEGI Online is all about and how it can help parents and young gamers when playing video games in an online environment. The PEGI Online folder currently exists in English and German. Coming soon are Spanish and French versions too!



REGIONAL ACTIVITIES:



European Commissioner **Viviane Reding**, responsible for Information Society and Media issues said in an upbeat key-note speech at the PEGI Online launch in June: "I want to stress that it is a considerable achievement that the self-regulatory Pan European Games Information age-rating system PEGI replaced a significant number of

existing national age-rating systems with a single system that is identical throughout most of Europe!"

The Commissioner added: "This (PEGI Online) is a good example of an industry initiative developed in co-operation with other stakeholders which allows a rapid and flexible solution to the problems of new technologies and greater safety for our children".

But she didn't stop at verbal praise, the Commission went further, it made a material contribution to PEGI Online sourced from the EU Safer Internet Programme's budget line.

Ms Reding is known to believe: "...self-regulation should have teeth and that PEGI should ensure that their rating system is effective". She calls for evidence on the up-take of PEGI Online through "...regular reports to the Commission and to the public." Pointing to one of the key issues PEGI should address in the near future she asks: "...how to increase the awareness of the PEGI age rating system, especially among parents".

This report and the articles below go some way to responding to these questions.

PEGI COMMUNICATION CAMPAIGNS at a local level



PEGI COMMUNICATION CAMPAIGNS at a local level

Austria



Event Sponsors:

OVUS (Austrian Entertainment Software Association) www.ovus.at
 Vienna city government: www.magwien.gv.at

PEGI sponsors "Game-City" event in Vienna.

« Game-City – Computerspiel findet Stadt » (Computer games come to town).

Vienna's beautiful 19th century Gothic town hall designed by Friedrich Schmidt served as the venue for the first ever gaming event to be jointly organised by the Austrian Entertainment Software Association, OVUS, and the city of Vienna. Over 25,000 children and parents visited the three day festival to learn about videogames, protection of minors and media literacy. The building provided an atmospheric backdrop lending a "Harry Potter" flavour to the scene.

The Interactive Software Federation of Europe (ISFE), at the invitation of OVUS, its Austrian member association, and the city of Vienna, joined in using the opportunity to spread the word about the Pan-European Game Information (PEGI) system and PEGI Online.

Game City was also sponsored by the main video game publishers, child protection organisations and numerous experts in media literacy and child psychology. While the young sampled the latest videogames, over in a separate congress room, parents gathered information and tips on the safe(r) use of these new interactive media. They attended presentations from international experts on new media in today's society and participated in a political roundtable that addressed the issues.



Denmark



Sponsor:

MUF (Danish multimedia trade association) www.muf.dk



There is some wisdom in the maxim “don’t blame the messenger”... even if, at times, he does skew the facts a little! And a timely public relations campaign providing target information and good

background contributes to relieve the pressure the reporter so often finds himself under. It goes a long way to prevent the wrong messages from getting published.

In the run up to the launch of PEGI Online the Danish Trade Association (M.U.F), true to form, set about mounting a PR campaign to inform and explain the project to the Danish media. In that context, during the annual meeting in October 2006 of the PEGI advisory board in Copenhagen, M.U.F fielded interviews with Patrice Chazerand, ISFE secretary general and Susanne Boe from the Media Council for Children and Young People to the national Danish media, to great effect.

France



Sponsor:

SELL (Syndicat des Editeurs de Logiciels et de Loisirs) www.sell.fr



SELL, (Syndicat des Editeurs de Logiciels et de Loisirs) had a busy summer in 2007 keeping the industry’s key concerns prominent in the media nationwide as well as through campaigns initiated in the capital and the Côte d’Azur.

A prime information drive was mounted around KIDEXPO, the first ever all encompassing exhibition to cater to the family. For three days 50,000 visitors

browsed stands on education, schooling, games, youth, culture, leisure, holidays, day-to-day practical issues and new technologies in Paris at the Porte de Versailles in June.

Advance notice of the event as well as on SELLs participation at the show with a stand featuring PEGI, went out to over 200 journalists in the form of a press release. During the fair a packed press conference on videogames, violence and the family unfolded.

In Cannes meanwhile at the Interactive and Digital Entertainment Festival (IDEF 2007) PEGI got wide exposure thanks to a premium press trip SELL organised targeting key media players. Twenty journalists from national papers, television, radio and the Web, such as Les Echos, la Tribune, Le Monde, Le Figaro and RTL covered the European game classification system PEGI.

In early summer, distributors throughout France got equipped with PEGI posters for display at sales outlets and give-away CD-ROMs titled: “Videogames: taking the right choices together”.



Italy



Sponsor:

AESVI (Italian Federation for Interactive Software) www.aesvi.it

PEGI Advertising Campaign: "Videogames? Play by the rules!" (Videogame? Queste le regole del gioco!)

In Italy where there has been recent debate on the undue influence videogames can exert on minors, AESVI directed a major information campaign in December 2006, just before Christmas. Ads were placed in the three leading Italian newspapers; Il Corriere della Sera, La Repubblica and Il Sole 24 Ore.

The target message was designed to sensitise public opinion to the importance of applying the safety guidelines set out by the PEGI system, bearing in mind that consumers are no longer only young people and minors but also adults. The campaign, the first of its kind, was so successful that the Ministry of Education has decided to team up with AESVI to pursue further communication campaigns in schools.



Poland



Event sponsor: ISFE - **Event handling:** Marcin Turski

PEGI at Mania Grania 2007 in Poland



From mid May to end of June 2007, PEGI took to the road with "Mania Grania", a Polish roadshow, stopping in 6 major cities dotted around the country. Posters and leaflets distributed to schools, shopping centres and passers-by gave advanced notice of events inviting young gamers and their parents to join in free gaming sessions. A wealth of



Hugely popular gaming paradises, were set up in front of various shopping centres attracting thousands of visitors, 30,000 in total. PEGI was represented in the form of educational folders for parents and T-shirt and cap give-aways for the children. A PEGI quiz designed to encourage participants to get a better grasp of the age ratings and protection of minors issues drew the attention of the public.

useful information on games, age ratings and the like were handed out.



Sweden



Event sponsor: MDTS (Swedish Multimedia Trade Association) www.dataspelsbranschen.se

Nordic Game Event in Malmö



To the north where the winter days are cold and gaming is a hot pursuit, Nordic Game, an annual conference held in Malmö, Sweden takes place. Its primary target group is developers, but the event is also frequented by a wide range of specialists connected with the sector such as academics, government representatives, publishers, media and analysts to name but a few. This year

more than 850 participants travelled from across the globe to be there and 50 speakers from different countries led the

discussions. PEGI was present in the form of an information booth. As well as distributing data on PEGI and PEGI Online PEGI staff also hosted a competition on the game MotorStorm. Jürgen Bänsch from ISFE gave a PEGI Online presentation.



Gothia Cup in Gothenburg



Soccer fans from among the gaming community will be aware of the Gothia Cup, held in Gothenburg (www.gothiacup.se) classed as the world's biggest youth football tournament. More than 1,500 teams,

totalling 30,000 players, participate annually. And this is not to mention the many parents, spectators and tournament volunteers also present. In all more than 58,000 people gathered for the Cup this year.



The Swedish Games Industry and PEGI sponsored one of last year's winning clubs Boo FF – the second largest football club in Sweden. As a result the team; "B 11 united" has been displaying the PEGI logo and symbols on its T-shirts during training and throughout the duration of its matches attracting desirable public attention to the cause.



But that is not all, during the tournament, in cooperation with Nintendo Sweden and the Swedish Games Industry, PEGI staff were able to display all the latest PEGI material in the heavily frequented Nintendo area.

An overview of the communication material with downloadable features and website links is available on the ISFE homepage www.isfe.eu



ANNEXES



ANNEX 1

PEGI Code of Conduct

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

Article 1: SCOPE

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 licences 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 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.

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, bad language and gambling.

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

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 PEGI 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, descriptors or the PEGI Online label 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 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

PEGI Online Safety Code (POSC)

PEGI ONLINE SAFETY CODE ('POSC'): A CODE OF CONDUCT FOR THE EUROPEAN INTERACTIVE SOFTWARE INDUSTRY

Article 1: SCOPE

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

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

Article 2: PURPOSE

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

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

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

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

Article 3: POSC INSTRUMENTS

The European interactive software industry has put in place five different instruments to fulfil the objectives set out in Article 2 above, four of which are common to the POSC and the PEGI Code and so maintain the consistency of both systems. These instruments are:

A. The PEGI Advisory Board (PAB) which includes representatives from key stakeholders (parents, consumers associations, child psychology experts, academics, media experts and the interactive software industry). This body ensures that the POSC responds to ongoing social, legal and technological developments.

B. The independent PEGI Complaints Board (PCB) which again includes representatives from key stakeholders, and is entrusted with management of the following three matters:

- conflicts between applicants and the PO Administrator. (see E. below);
- complaints about the consistency of advertising, marketing and promotional activities of any POSC signatory with the provisions of the POSC;
- disputes about the implementation of POSC by signatories.

C. The PEGI Enforcement Committee (PEC) charged with implementing the recommendations of the PAB Board and, more generally, of ensuring the enforcement of the provisions of the POSC, including decisions of the PCB.

D. A Legal Committee, also common to the PEGI system, which will ensure the ongoing coherence and consistency of the POSC Licensing System (see E below) with national legal frameworks.

E. A Licensing System operated by ISFE with the assistance of an Administrator, for issue of licenses to use the PEGI Online Label (POL), whereby assurance is given to the public that the licensee has committed to abide by all provisions of the POSC.

Article 4: ISFE'S COMMITMENT TO THE CODE

ISFE hereby commits to:

- a.** operate the POSC in as efficient a manner as possible.
- b.** ensure comprehensive, thorough awareness and understanding of the POSC and its purposes by all participants in the interactive software industry, including publishers, developers, website operators, wholesalers, retail, trade media and advertising companies.

c. implement and maintain the structures necessary to interpret, operate, publicise and update the POSC, whilst also conducting studies and reports on its ongoing application to interactive software.

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

Article 5: OBLIGATIONS OF ISFE MEMBERS

The members of ISFE shall:

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

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

c. assist ISFE in delivering on its own commitments as provided in Article 4 above.

The obligations listed above shall enter into force as soon as the POSC is implemented.

Article 6: LEGAL AND REGULATORY ENVIRONMENT

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

Article 7: AGE RATING AND LABELLING

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

7.1 Applicants to the POSC shall complete an online application form to be sent to the Administrator of PEGI Online (hereinafter ‘the PO Administrator’).

7.2 The application form will address the main concerns raised by parents and educators concerning online game play, namely;

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

7.2.2 The PEGI Online label (POL) will provide a direct hyperlink to a dedicated website where appropriate information will be given regarding the risks arising from the fact that content created in the course of game play may be unknown to the original publisher. Alternatively and where appropriate, signatories shall display the URL associated with the said dedicated website in a prominent position visible to users of online services.

7.3 Applicants will use their best endeavours to ensure that operators of online services not under the control of the applicant but containing game content published by the applicant abide by the POSC rules and/or subsequently become signatories of the POSC themselves.

Article 8: LICENSING AND LABELLING PROCEDURES

8.1 Following the completion of the online application form (see Article 7.1) the PO Administrator shall evaluate the ability of the applicant to comply with the commitments of the POSC, in light of answers and material provided by the applicant, including possible codes of conduct already enforced by the applicant as far as online games are concerned and the other factors as set out at Article 9 below.

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

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

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

8.5 Licence holders shall ensure that the POL is used only in accordance with national legal requirements and that, in particular, it is not used in countries where the products carried on the online services concerned are prohibited or subject to compulsory legal classification.

Should products available on online services carrying the POL be subject to such classification in any country or countries, the use of the POL shall be accompanied by a conspicuous reference to any consequent conditions covering game play on the said services.

Article 9: KEY PROVISIONS

Content: Licence holders shall use their best endeavours to ensure that online services under their control are kept free of content which is illegal, offensive, racist, degrading, corrupting, threatening, obscene or might permanently impair the development of minors.

When online services under the control of the license holders also contain user generated content, the license holders shall use their best endeavours to immediately take down user generated content which is illegal, offensive, racist, degrading, corrupting, threatening, or obscene

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

Undesirable Content: Consistent with the foregoing paragraph, licence holders will ensure that appropriate reporting mechanisms are in place to allow game players to notify licence holders of the existence of undesirable content on any related websites offering online services under their control.

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

Privacy: any licence holder engaging in the online collection of personal information from subscribers will maintain an effective and coherent Privacy Policy fully in accordance with all applicable European Union and national Data Protection laws. The Privacy Policy will encompass the responsible collection, distribution, correction, and security of the personal details of subscribers who shall be given full details of the licence holder's Privacy Policy before the finalisation

of any subscription to an online service. Subscribers must be also be given the opportunity to comment on any perceived misuse of their personal details and therefore be fully advised as to ways, for example, of avoiding unsolicited or unwanted email contact.

Protection of Minors: in keeping with one of the main objectives of the POSC, licence holders must adhere to stringent standards ensuring the protection of children from any unsuitable content and behaviour associated with any website aimed at children. These standards shall include, where appropriate;

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

Article 10: ADVERTISING AND PROMOTION

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

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

- all advertisements must accurately reflect the nature and content of the product represented and wherever reasonably practicable the rating issued (i.e. an advertisement should not mislead consumers as to the product's true character).
- all advertisements shall be created with a sense of responsibility towards the public.
- no advertisement shall contain any content that is likely to cause serious or widespread offence to the average consumer targeted.
- licence holders shall not specifically target advertising for entertainment software products rated 16+ or 18+ to consumers for whom the product is not rated as appropriate.
- licence holders 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 PEGI Online Safety Code audience for which the core product is intended.
- licence holders should inform the public by means of a general statement of the existence of sponsorships and/or the existence of 'product placements' associated with any

online service. In this regard use of a trade mark or brand solely to provide authenticity to the game environment shall not be held to constitute either product placement or sponsorship provided that licence holders do not receive payment in exchange for such use.

- licence holders shall not enter into promotion of online interactive software products rated 16+ or 18+ with another company's brands, products, or events, if it is reasonable to believe that such company's products, brands or events will reach consumers for whom the interactive software product is not rated as appropriate.

Article 11: ADVISORY BOARD

To ensure the continuing applicability of the POSC taking into account potential social, legal and technological developments, the PEGI Advisory Board (PAB) will be made available to the management of the POSC. The PAB has been established to interpret the provisions of the PEGI Code of Conduct and to suggest appropriate implementation tools. The PAB is made up of:

- parents/consumer organisations,
- child psychology experts,
- media experts,
- lawyers expert in European minor protection laws,
- academics,
- a representative of the PEC,
- a representative of ISFE
- the PO Administrator.

Article 12: COMPLAINTS BOARD

The PEGI Complaints Board (PCB) will be used to:

- handle possible complaints about the consistency of advertising, marketing and promotional activities of licence holders with the provisions of the POSC.
- handle possible conflicts about the way the POSC is implemented by licence holders. The PCB draws on similar skills as the PAB, as reflected by its current composition (see Article 3.A and B above).

Article 13: ENFORCEMENT COMMITTEE

Compliance with the POSC, the provision of advice to all companies deciding to subscribe to the POSC as well as to the PO Administrator, possible sanctions on licence holders infringing the POSC, shall be entrusted to the PEC (see Article 3.C above). The PEC is made up of carefully selected representatives of the industry, as nominated by the ISFE Board and elected by the General Assembly of ISFE.

Article 14: SANCTIONS

14.1 In addition to infringements spotted by third parties or the Administrator, the PEC and the PCB shall jointly identify and document any possible wrongful application of the POSC.

Reasonable, non-arbitrary discretion will be used in examining all relevant facts to enable a determination of appropriate sanctions. The PEC and PCB will also suggest corrective steps commensurate to the violation, to be implemented immediately.

14.2 Failure to comply with the POSC and/or a decision of the PCB as described above will expose offenders to sanctions including but not limited to the following measures:

- temporary removal of the POL licence from a licence holder,
- mandatory modification of any associated advertisements both on and off-line,
- permanent removal of the POL licence from a licence holder,
- removal of the POL from any online service associated with breach of the POSC,
- a fine of between €1000 and € 250,000 per violation depending on the gravity thereof and the failure to take appropriate remedial action.

14.3 Violations covered by these sanctions include presenting misleading or incomplete material to support the original application for a POL license, failure to submit changes, updates, or modifications that affect the ability of the license holder to comply with its obligations under the POL license in a timely fashion, selfapplication or flawed display of logos or the POL by the license holder, inappropriate targeted marketing, and, more generally, all steps or omissions that fail to show a sense of responsibility towards the general public.

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

14.5 Any PEC decision imposing a sanction on a licence holder can be referred by that licence holder, 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 3 : PEGI Signatories

Publisher Company	country
10tacle Studios AG	Germany
1C Publishing EU sro	Czech Republic
505 Games Srl	Italy
Activision UK Ltd	United Kingdom
Agetec Europe, Ltd	USA
AIM Productions n.v.	Belgium
Alten8 ltd	United Kingdom
ANKAMA GAMES	France
Anuman-Interactive SA	France
Aqua Pacific Ltd	United Kingdom
Artplant AS	Norway
Ascaron Entertainment Gmbh	Germany
Aspyr Media Europe	United Kingdom
Atari	France
Atari UK Ltd	United Kingdom
B2B Games	France
Beat Games	Germany
BHV Software Gmbh & Co. KG	Germany
Bigben Interactive (France)	France
Blast Entertainment Ltd.	UK
Blaze Games Ltd	United Kingdom
Blue Label Entertainment Srl	Italy
Blue Monkey Studios Inc.	United Kingdom
Bongfish Interactive Entertainment	Austria
Braingame Publishing GmbH	Germany
Bright Things PLC	United Kingdom
Brightstar Entertainment Ltd	United Kingdom
Buena Vista Games, Inc.	France
BWM Software und Vertriebs GmbH	Germany
Carré Multimedia	France
CCP hf.	Iceland
CD Projekt	Poland
CDV Software Entertainment	Germany
CE Europe	United Kingdom
Cinemax sro	Czech Republic
City Interactive SA	Poland
Codemaster Software Cie Ltd	United Kingdom
Conspiracy Entertainment Europe Limited	United Kingdom
D3Publisher of Europe Ltd (D3P E Ltd)	United Kingdom

Publisher Company	country
Data Design Interactive Limited	UK
Davilex Games BV	The Netherlands
Discovery Concepts International Limited	United Kingdom
Disky Communications Europe B.V.	The Netherlands
DreamCatcher Europe (Ontario)	France
DTP Entertainment AG	Germany
Dusk2Dawn Interactive Limited	United Kingdom
E2 Publishing srl	Italy
East Entertainment Media	GMBH Germany
Easy Computing NV	Belgium
Editorial Planeta DeAgostini S.A.	Spain
Educamigos s.l.	Spain
Eidos Interactive	United Kingdom
Eko Software	France
Electronic Arts Swiss sarl	United Kingdom
Elektrogames	France
ELEPHANT Entertainment	United Kingdom
Emme SA	France
Empire Interactive Europe Ltd	United Kingdom
Endforce Ltd	United Kingdom
Enemy Technology LLC	USA
Enlight Software	China
Ertain BV	The Netherlands
Excalibur Publishing Limited	United Kingdom
F4-Toys	France
Filao	France
Focus Home Interactive	France
Focus Multimedia Limited	United Kingdom
France Telecom DAC (Wanadoo)	France
Frogster Interactive Pictures AG	Germany
Frontline Studios	Poland
Funcom	Norway
Fusion Labs Ltd.	United Kingdom
FX Interactive S.L.	Spain
Gabitasoft BVBA	Belgium
Gaelco movieles SL	Spain
Gameloft S.A.	France
Games Factory Online BV	The Netherlands
GamesRouter Ltd	United Kingdom
Ghostlight Ltd.	United Kingdom

Publisher Company	country
Giochi Preziosi HK Ltd	China
Gizmondo Europe Limited	United Kingdom
GMX Media	United Kingdom
Gost Publishing	Belgium
Greenstreet Software Limited	United Kingdom
Groove Media Inc.	Canada
GSC Game World	Cyprus
Guidance Interactive Healthcare	USA
Hanaho Games Inc.	USA
HD publishing	The Netherlands
Hell-Tech	Germany
Hip Interactive (LSP)	France
Home Entertainment Suppliers Ph. Ltd	Australia
Hudson Entertainment	USA
Idea Games as	Czech Republic
Igniton Entertainment Ltd	United Kingdom
In2Games Ltd.	United Kingdom
IncaGold plc	United Kingdom
Indie Games Productions	France
Intenium GmbH	Germany
Introversion	United Kingdom
IQ Publishing SC	Poland
Ivolgamus UAB	Lithuania
Jakks Pacific / Kids Biz	USA
Jelly Bridge Productions Ltd	United Kingdom
Jester Interactive	United Kingdom
Joanna Grahm	Sweden
JoWood Production Software AG	Austria
Just Flight Ltd.	United Kingdom
K.E Mathiasen A/S	Denmark
K2 Networks Inc	United Kingdom
Kalypso Media GmbH	Germany
Koch Media	United Kingdom
Koch Media GmbH	Austria
Koei Ltd	United Kingdom
Konami Digital Entertainment GmbH	Germany
Krea Medie A/S (Ltd.)	Denmark
Lasnersoft	France
Leader S.p.A.	Italy
Legendo Entertainment AB (Iridon)	Sweden

Publisher Company	country
LEXICON Entertainment	United Kingdom
Lighthouse Interac. Game Publishing BV	Netherlands
Limbic Entertainment GmbH	Germany
Load Inc.	France
Lockpick Entertainment	Sweden
MadCatz Inc.	USA
Majesco Europe Limited	United Kingdom
Mastertronic Games Ltd	UK
Mattel UK Limited	United Kingdom
MC2 France	France
Media Sales&Licensing BV	The Netherlands
Mercury games	United Kingdom
Metro3D Europe Ltd	United Kingdom
Micro Application	France
Microsoft Ireland	Ireland
Microtime	United Kingdom
Midas Interactive Entertainment Ltd	United Kingdom
Midway Games Ltd	United Kingdom
Mindscape France S.A.	France
Mindscape Northern Europe BV	The Netherlands
Momentum Bilgisayar Yazilim A.S	Turkey
Monte Cristo Multimedia SA	France
Moonpod Ltd	United Kingdom
Morphicon Ltd	Germany
NAMCO BANDAI Games Inc.	Japan
NC Soft Europe Ltd.	United Kingdom
NDS Denmark A/S	Denmark
Neko entertainment	France
Nevrax France	France
Nexon Europe Ltd	United Kingdom
Nintendo of Europe GmbH	Germany
Nnooo	Australia
Nobilis	France
Nokia Products Limited	USA
Novalogic Ltd	United Kingdom
ONIMEDIA SP. Z O.O.	Poland
Openoko Entertainment	Poland
Outerlight Ltd	United Kingdom
Oxygen Interactive	United Kingdom
P.M. Studios S.r.l.	Italy

Publisher Company	country
PAN Vision	Sweden
Panini Spa	Italy
Paradox Entertainment	Sweden
Phantagram Co. Ltd	Korea
Phenomedia Publishing GmbH	Germany
Phoenix Games BV	United Kingdom
Phoenix Global Software Limited	United Kingdom
PILOT'S Stefan Schäfer GesmbH	Austria
Play It Ltd	United Kingdom
Playlogic International NV	The Netherlands
PopCap Games, Inc.	USA
Positive Gaming Europe AB	Sweden
Power Up S.r.l.	Italy
Prelusion Games AB	Sweden
Project Three Interactive BV	The Netherlands
Promotion Software Agentur GMBH	Germany
Quality Games Online Ltd.	United Kingdom
Red Mile Entertainment	USA
Redback Sales Ltd	United Kingdom
RedOctane	USA
Reef Entertainment Limited	United Kingdom
responDESIGN	USA
Rising Star Games Ltd	United Kingdom
Riverdeep Interactive Learning Limited	Ireland
RTL Games GmbH	Germany
Sammy Europe Ltd	United Kingdom
SEGA Europe Ltd	United Kingdom
SG Diffusion S.A.S.	France
Shindo S.A.S.	France
Slam Games Ltd	UK
Sniper Entertainment	France
SNK PLAYMORE CORPORATION	Japan
SOE Europe Ltd	USA
Sony BMG Music Entertainment GmbH	Germany
Sony Computer Entertainment Europe	United Kingdom
SouthPeak Interactive	USA
Spin Master Studios	USA
Square Enix Ltd	United Kingdom

Publisher Company	country
Submarine	The Netherlands
System 3 Ltd	United Kingdom
Tailteann Games Ltd.	Ireland
Taito Corporation	Japan
Take 2	United Kingdom
Tapwave Inc.	USA
TDK	Grand Duchy of Luxembourg
Teamworks Productions Limited	United Kingdom
Techland	Poland
TELEagri Media GmbH	Germany
The Game Creators Ltd	United Kingdom
The Games Company Worldwide GmbH	Germany
The Toy:Lobster Company Ltd	United Kingdom
THQ	United Kingdom
Tivola Publishing GmbH	Germany
Transposia NV	Belgium
Tripwire Interactive LLC	United Kingdom
TV4	Sweden
Ubisoft EMEA	France
Ubisoft NL	The Netherlands
Virgin Play S.A.	Spain
Virtual Toys S.L.	Spain
Vivendi Games Ireland Ltd	Ireland
VS Digital GmbH	Germany
Wacom Europe GmbH	Germany
Walkon	Germany
Walt Disney Home Entertainment	United Kingdom
Walt Disney Internet Group	United Kingdom
Warner Bros. Interactive Entertainment	USA
WAYWARDXS Entertainment SRL	Italy
Wendros AB	Sweden
Wendros AB	Sweden
Whiptail Interactive (Europe) SL	Spain
White Park Bay Software	United Kingdom
Yoostar Ltd.	United Kingdom
ZeniMax Europe Ltd	USA
Zoo Digital Group Plc	United Kingdom
Zuxxez Entertainment AG	Germany



ANNEX 4 : PEGI Questionnaire

Rating	No.	Question	Help	Content descriptor
		Does the game contain		
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	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 techniques likely to be useful in the commission of offences	The descriptions have to show how the offences can be carried out. For example an instruction manual showing how to make a molotov cocktail or bomb would be included under this question as would details of the implements needed to break into a car and how to use them.	---
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.strip tease)	---

Rating	No.	Question	Help	Content descriptor
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 offences	A game likely to stimulate or encourage the commission of offences will probably show such acts resulting in a 'yes' answer to Question 7. Beyond this it should be remembered that stimulation or encouragement can be achieved by the use of words as well as pictures. The game must induce some feeling of wanting to indulge in such acts.	---
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 question 13.	---
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.	---

Rating	No.	Question	Help	Content descriptor
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.	---
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).	Violence
18	17	Depictions of apparently motiveless killing or serious injury to multiple numbers of innocent human-like characters	This is where groups of human-like characters are killed or injured at random for no apparent reason and deals with themes such as the killing of pedestrians in the street, shoppers in a shopping arcade and children in a school. The characters must look like humans or animals. If a character looks like a human it should be treated as human even if it is unrealistic (if something called a zombie or any other name looks like a human it should be treated as human).	Violence
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.	Violence

Rating	No.	Question	Help	Content descriptor
18	19	Depictions of sexual activity with visible genital organs	Sexual activity means all aspects of human sexual intercourse, masturbation and sexual foreplay (homosexual or lesbian activity included) where a male or female sexual organ is visible. The depiction of 'boobs and bottoms' or pubic hair only will not be treated as visible sexual organs.	Sex
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.	Violence
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.	Violence
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).	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.	Discrimination
18	24	Sexual expletives or blasphemy (only answer 'yes' to this question if a 'yes' answer has been given to any of questions 16 –23)	A 'yes' answer to this question 24 will ensure that a language descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 16 – 23 do not answer 'yes' to this question 24. The most common sexual expletives are fuck, cunt, motherfucker and cocksucker although this list is not exhaustive. Blasphemy means irreverent depictions or words concerning sacred matters or religious beliefs (not restricted to the Christian faith). It should be noted that blasphemy is likely to be illegal under national criminal laws and may not be included in the game in any event.	Bad Language

Rating	No.	Question	Help	Content descriptor
18	25	Moving images that encourage and/or teach the use of games of chance that are played/carried out as a traditional means of gambling (only answer 'yes' to this question if a 'yes' answer has been given to any of questions 16 –23)	A 'yes' answer to this question 25 will ensure that a gambling descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 16 – 23 do not answer 'yes' to this question 25. This refers to types of betting or gambling for money that is normally played/ carried out in casinos, gambling halls, racetracks. This does not cover games where betting or gambling is simply part of the general storyline. The game must actually teach the player how to gamble or bet and/or encourage the player to want to gamble or bet for money in real life. For example this will include games that teach the player how to play card games that are usually played for money or how to play the odds in horse racing.	Gambling
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.	Violence
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.	Violence
16	28	Depictions of arcade style or sporting action showing violence containing blood or gore	Arcade style action refers mostly to 2D effect depictions where the characters move left and right to attack each other. If there is no blood or gore then a 'yes' answer to question 39 is probably more appropriate.	Violence
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.	Sex
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.	Sex

Rating	No.	Question	Help	Content descriptor
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.	Bad Language
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.	Drugs
16	33	Depictions of the use of illegal drugs	This includes the use of illegal drugs in any circumstances.	Drugs
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.	Violence
16	35	Moving images that encourage and/or teach the use of games of chance that are played/carried out as a traditional means of gambling(only answer 'yes' to this question if a 'yes' answer has been given to any of questions 26 –34)	A 'yes' answer to this question 35 will ensure that a gambling descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 26 – 34 do not answer 'yes' to this question 35.This refers to types of betting or gambling for money that is normally played/carried out in casinos, gambling halls, racetracks. This does not cover games where betting or gambling is simply part of the general storyline. The game must actually teach the player how to gamble or bet and/or encourage the player to want to gamble or bet for money in real life. For example this will include games that teach the player how to play card games that are usually played for money or how to play the odds in horse racing.	Gambling
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.	Violence
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).	Violence

Rating	No.	Question	Help	Content descriptor
12	38	Moving images that depict any minor assault on a human-like character that does not result in any obvious injury or harm (whether or not it is realistic looking violence)	This is where the violence to the human-like character is realistic but very minor such as a slap or smack and the victim does not show any apparent harm or injury.	Violence
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.	Violence
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.	Sex
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	Bad Language
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. 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.	Gambling

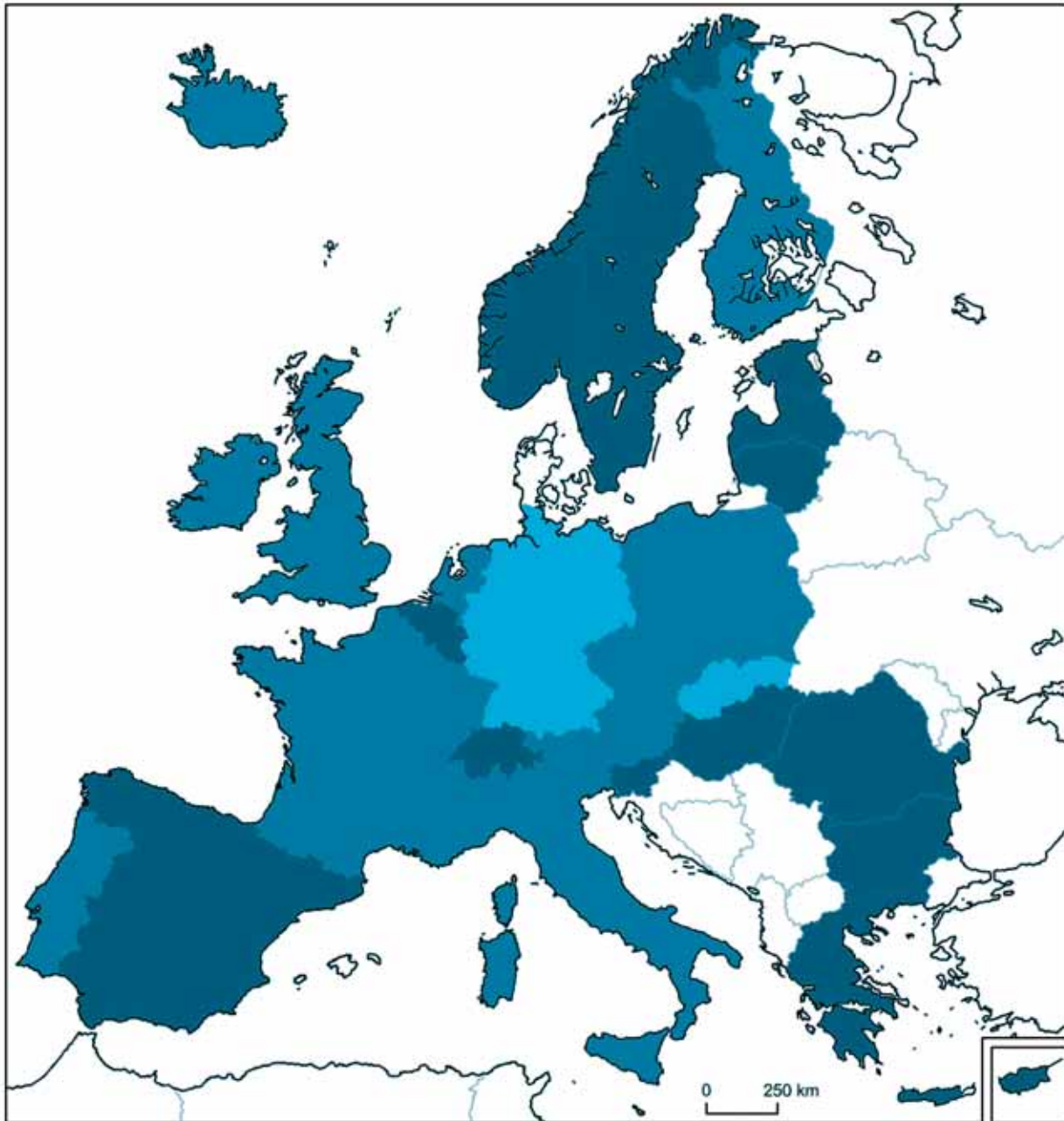
Rating	No.	Question	Help	Content descriptor
7	43	Depictions of non-realistic violence towards fantasy characters	A fantasy character is a character that does not exist in real life and does not take a human appearance and includes ghosts, gremlins, dragons and other mythical creatures. The characters 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).	Violence
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.	Violence
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.	Violence
7	46	Pictures or sounds likely to be scary or frightening to young children	This is where you do not actually see or hear anything specifically violent but nevertheless because of the sounds or depictions the overall theme may be frightening to young children (haunting or aggressive music, entering a haunted house, background screams or rustling in the undergrowth).	Fear
3	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.	----
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.	----
Extra question	49	Does the game allow online game play with or against other people?	Note for Helliwood: a yes answer to this question should trigger the PEGI Online descriptor to be included in the PEGI Classic license.	PEGI Online Descriptor

ANNEX 5 PEGI complaints

Date	Game	Initial rating	Resulted rating	Publisher	Complainant	Ad hoc Compliant Board
21-Sep-04	Atlantis	3+	12+		Dr. Jim Warwicker	Dag Asbjornsen (Chair) Jean Pierre Quigneaux, Rosemary Walker
4-May-06	Trauma Center; Under the Knife	7+	12+	Nintendo	Miss Elizabeth Wyatt	Iain Muir (Chair), Spyros Pappas, Lars Gjerlufsen
23-Mar-07	Shrek 3	12+	7+	Activision	Activision	Spyros Pappas (Chair), Jean-Pierre Quigneaux, Lars Gjerlufsen
5-Apr-07	Kirikou	7+	7+	Emme	Emme	Hanna Hoppo (Chair), Annemarie Walker, Antonio Xavier
28-Jun-07	Scrabble Edition 2007	12+	3+	Nintendo	Nintendo	Lars Gjerlufsen (Chair), Jean Pierre Quigneaux, Hanna Hoppo
13-Jul-07	Power Rangers	12+	12+	Disney Interactive Studios	Disney Interactive Studios	Spyros Pappas (Chair), Rosemary Walker, Antonio Xavier
9-Aug-07	Pokemon	7+	7+	Nintendo	Nintendo	Antonio Xavier (Chair), Jeffrey Goldstein, Lars Gjerlufsen
3-Oct-07	Zack and Wiki: the Quest for Barbados Treasure	12+	7+	Capcom Ltd.	Capcom Ltd.	Antonio Xavier (Chair) Dominika Urbanska, Lars Gjerlufsen

Complaint	PCB Conclusion
<p>"The game is rated 3+, but contains machine guns and a throat slitting in the first part of the game."</p>	<p>"The rating of the game should be 12+ for Violence as the game contains "non graphic violence against humans or animals". The game also contains some "mild swearing" (the phrase "what the hell!") which also warrants a 12+ for Bad language.</p>
<p>The words 'bastard' and 'arse' in the game are not acceptable in a game rated 7+.</p>	<p>These words clearly fall within the list in the ratings form and the game should therefore have been given a 12+ rating. The Board is satisfied that there was no deliberate intention to mislead the administrator or the public and that this was merely a mistake on the part of the coder.</p>
<p>Activision firmly believes that the application of PEGI Age Rating system in this instance has delivered a rating that is not representative of the game content or consistent with the Shrek brand, particularly in light of the content routinely available in other 12+ rated games.</p>	<p>The criterion Q37 (Depictions of non-realistic looking violence towards human-like or animal-like characters) seen under the interpretation given above, namely the philosophy reflected by the game Shrek 3 (and its previous editions of which it forms a follow up), the happy climate created by its figures and the light atmosphere that is offering the game should not lead by way of exception to a 12+ rating but to a 7+ rating.</p>
<p>The product and the easy gameplay were especially designed for 4-7 years old and over this age children would find it not appropriate. We think that the "obvious nudity" is not acceptable for this character: Kirikou is a baby in Africa and as all the babies, especially in Africa, he is naked!</p>	<p>"The game should be rated 7+ according to the rating 46) Pictures or sounds likely to be scary or frightening to young children. What comes to depictions of nudity in a non-sexual context, we think that it is not harmful for the development of children and thus should not be a reason for an age limit neither in this case or any other. We emphasize the NON-SEXUAL CONTEXT."</p>
<p>The publisher has given the game a 12+ rating, by answering yes to the question (41) Mild swearing and/or offensive language. They want it revised down to 7+.</p>	<p>There's no basis in the criteria to give a 7+ rating, and we therefore recommend to give a 3+ rating to Scrabble Edition 2007.</p>
<p>DIS firmly believe Power Rangers Super Legends is suited to a PEGI 7+ age rating. The absence of unrealistic violence towards humans in particular is of notable difference.</p>	<p>The fact that the CB accepted a reasoned exception does not mean that the rule is not applicable. As it is stated in the decision of 11 April 2007 the Question 37 remains appropriate and has to be applied.</p>
<p>We would have preferred to rate the game 3+ because we believe that the game's action is not traditionally violent (there is no physical contact, for instance). However, we could not adequately rate the game 3+ because the questions at this level do not allow for such a low level of fantasy 'violence'.</p>	<p>Having analysed the game "Pokémon Battle Revolution" the PCB thinks that it was well rated 7+, after signaling in the questionnaire a YES in the item 43: Depictions of non-realistic violence towards fantasy characters.</p>
<p>The questionnaire forced us to apply for an age rating that is not justified by the actual nature and content of the game, which is light-hearted and cartoonish. The game is designed to be played by younger players, and we believe there is no violence in this game that a player of 7 or above should not be exposed to.</p>	<p>After the examination of the game, the ADCB, while understanding the reasons for the 12+ automatic rating, according to the questionnaire, really thinks that it can be lowered to the rating 7+ with Violence and Fear.</p>

ANNEX 6 PEGI in Europe



- Territories where PEGI has been, or is expected to be, adopted into national law, or PEGI is acknowledged and forms the informational basis upon which national rating systems are operated.
- Territories where there is no national law governing video games age rating but the PEGI rating is used as parental advice.
- Territories which have a national rating system and do not accept PEGI ratings or accept no rating or advisory system at all.

For more information on PEGI and PEGI Online please contact:



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