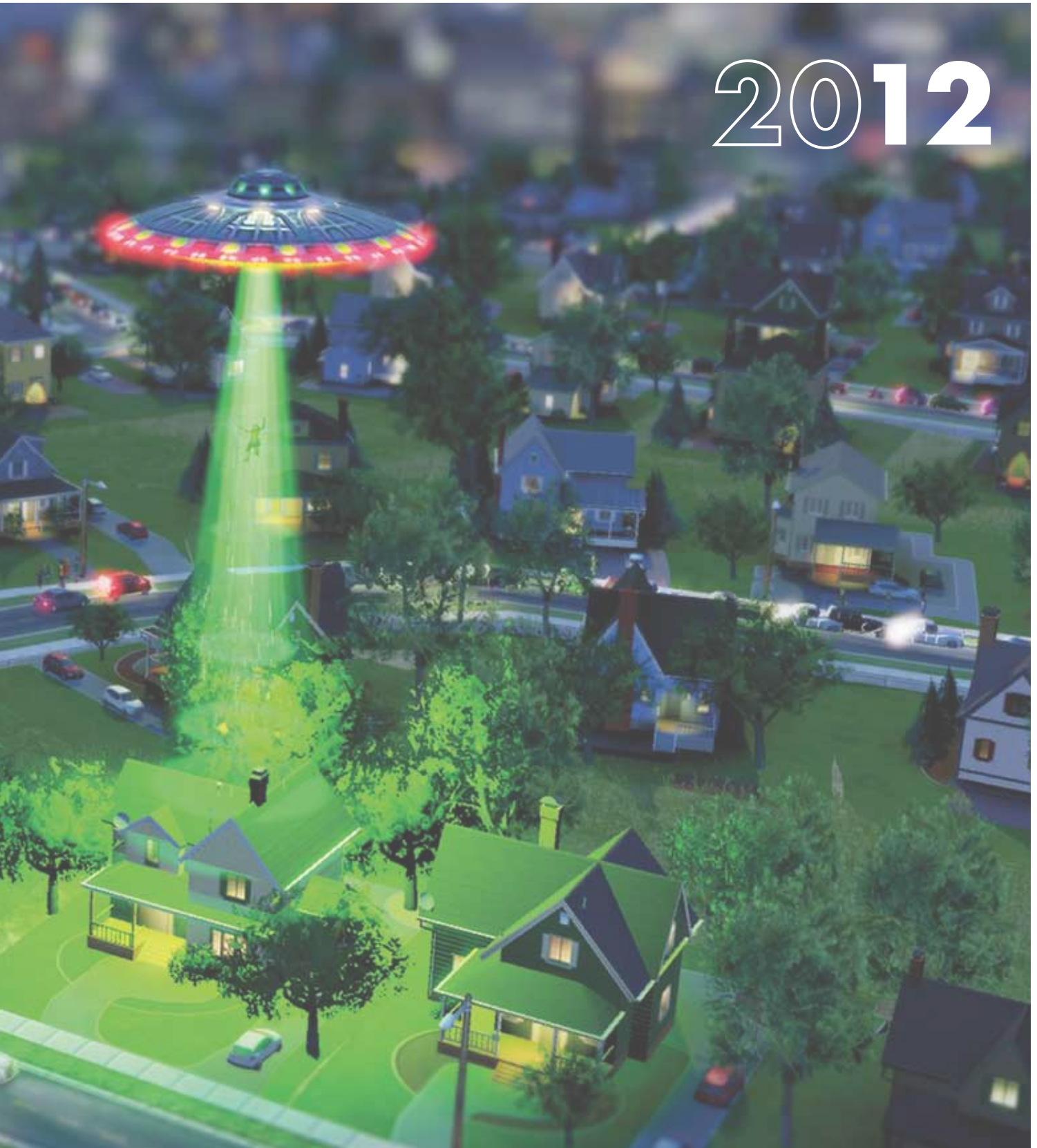


2012



INTRODUCTION		3
CHAPTER 1	The PEGI system and how it functions	4
	TWO LEVELS OF INFORMATION TO GUIDE CONSUMERS	5
	GEOGRAPHY AND SCOPE	6
	HOW A CONSOLE OR PC GAME GETS A RATING	7
	PEGI ONLINE	8
	PEGI FOR APPS	9
	PARENTAL CONTROL SYSTEMS	11
CHAPTER 2	Statistics	12
CHAPTER 3	The PEGI Organisation	20
	THE PEGI STRUCTURE	21
	PEGI s.a.	21
	PEGI Management Board	21
	PEGI Council	22
	PEGI Experts Group	23
	PEGI Complaint Board	23
	THE FOUNDER: ISFE	24
	THE PEGI ADMINISTRATORS	25
	NICAM	25
	VSC	25
CHAPTER 4	PEGI communication tools and activities	26
	INTRODUCTION	27
	SOME EXAMPLES OF 2012 ACTIVITIES	27
	OTHER PAN-EUROPEAN ACTIVITIES	29
	PEGI iPhone/Android app	29
	Website	29
	PEGI Congress	29
ANNEXES		30
	ANNEX 1 - PEGI CODE OF CONDUCT	31
	ANNEX 2 - PEGI SIGNATORIES	41
	ANNEX 3 - PEGI ASSESSMENT FORM	50
	ANNEX 4 - PEGI COMPLAINTS	58



7TM
www.pegi.info

INTRODUCTION

Dear reader,

Introductions to annual reports generally tend to look back at the past year, yet I have a strong tendency to also look forward in the following paragraphs, simply because we are very excited about what is coming. The general message in my introductions to previous reports was that the games landscape was changing rather radically and that PEGI needed to innovate to keep pace with the changes. Well, with PEGI for APPS (page 9) we now have an excellent solution in that combines the reliability of the PEGI system as we know it with the flexibility of digital products.

Looking at the number of games that have received a PEGI rating over the past decade, we've registered a decline in recent years (chapter 2, page 13). Up until 2009, the number of games rated by PEGI on an annual basis grew continually, but since then there's been a steady drop, adding up to a 33% decrease in the annual total compared to three years ago. With an average of 2000 games per year from more than 500 publishers, it's not easy to find a single root cause. But the video games sector is still a cyclical industry and in 2012, with the launch of the Wii U and rumors of new Playstation and Xbox consoles, it's clear that we've come near the end of a hardware cycle. Inevitably, that has an effect on the amount of games that are released. At the same time, the fact that the decline mostly affects games with a PEGI 3 rating seems to indicate that lots of casual games (like puzzle or platform games) have migrated to digital platforms for smartphone or tablet gaming. This also proves that the timing for PEGI for APPS is right.

Because this downward trend has a direct impact on the income of PEGI S.A., we've had to adjust our programme to the new situation, which means that there are less funds available to support the communication activities across Europe. Nevertheless, our efforts to raise awareness continue unabatedly, for example through PEGI label display in advertisements. Looking forward again, there are promising signs that will hopefully offset the abovementioned decline in boxed games. The app industry is very much alive with games as the strongest driver behind the growth, game downloads for consoles are also increasing steadily and the technology to stream games has improved tremendously. It is difficult to make predictions but these phenomena show that the games industry is more versatile than ever before. It is now up to us to keep PEGI S.A. equally adaptable.



Simon Little
Managing Director
PEGI S.A.

CHAPTER 1

The PEGI system
and how it functions



THE PEGI SYSTEM AND HOW IT FUNCTIONS



TWO LEVELS OF INFORMATION TO GUIDE CONSUMERS

An icon that represents the minimum recommended age.



The PEGI age rating considers the age suitability of a game, not the level of difficulty. This means that a game rated PEGI 3 can be very complex and difficult to master, whereas games rated PEGI 18 only require simple controls.

A series of content descriptors.

These icons are displayed on the back of the game box and indicate, where required, the nature of the content. There are 8 icons, depending on the type of content:



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



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



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



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



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



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



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



Game can be played online.

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

GEOGRAPHY AND SCOPE

PEGI is a system of self-regulation to promote the responsible use of video games. It is the first ever pan-European age rating scheme and has been operating since April 2003. PEGI provides the public – particularly parents – with an indication of the minimum age from which the content of a game is appropriate.

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 nature of the content and its suitability. This advice is based on criteria developed and assessed by experts.

The PEGI system applies to all game software, regardless of format or platform, sold or distributed in Europe by any company subscribing to the standards. The institutions of the European Union, together with the vast majority of governments in Europe fully support the project.

PEGI rated products are marketed in the following 30 countries:

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

As for all self-regulated systems, the PEGI System is based on a Code of Conduct (see Annex 1), a set of rules which every publisher of interactive software contractually commits to respect when using the PEGI system. The Code deals with age labelling, promotion and advertising of interactive products. It reflects the interactive software industry's commitment and concern to provide information to the public in a responsible manner.

With more than 20,000 games rated by the end of 2012, the PEGI system displays a proven ability to rally virtually all publishers that make games available via retail in Europe. Moreover, the system has delivered in its prime objective to help parents make informed buying decisions: they can now exercise their responsibility regarding the selection of games that suit their family with utmost confidence.

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



HOW A CONSOLE OR PC GAME GETS A RATING

1. Prior to release, publishers fill in an on-line product assessment and declaration form, for every version of their product. (See Annex 3)

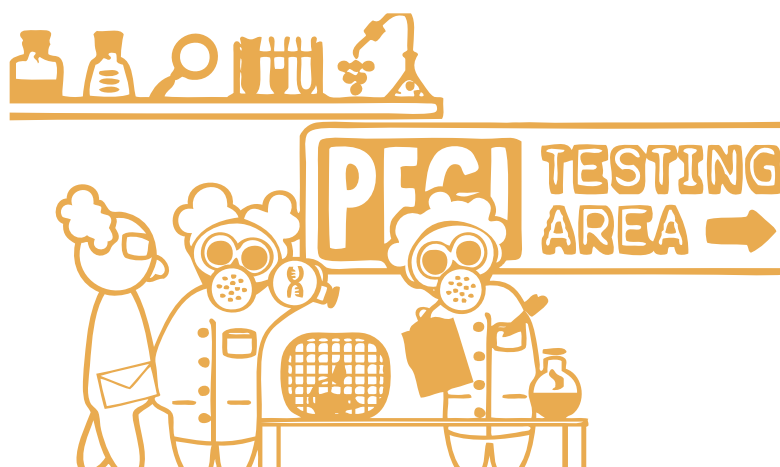
The first part of the form will prompt the publisher to check whether the product is subject to legal provisions in certain European countries (legal classification, limited distribution or prohibition). In such case, PEGI must be used in accordance with local rules in these countries.

2. The second part of the assessment form considers the content of the product, taking into account the possible presence of violence, sex, discrimination and other sensitive image or sound content.

3. According to the responses given, the online system automatically determines a provisional age rating, along with content descriptors indicating the reason why the entertainment software has been classified in the selected age category.

4. The PEGI administrator thoroughly reviews the provisional age ratings. NICAM takes care of the games rated 3 and 7, whereas the VSC reviews the 12, 16 and 18 ratings.

5. PEGI subsequently delivers a license to the publisher for the



use of the age rating icon together with the related content descriptor(s).

6. The publisher is now authorised to reproduce the appropriate age rating logo and content descriptor(s) on the packaging or at the digital point of sale in accordance with the PEGI Labelling Guidelines and the PEGI Code of Conduct.



PEGI ONLINE



PEGI Online was launched in 2007 as an addition to the PEGI system with the purpose to give young people in Europe better protection against inappropriate online gaming content and to help parents understand the risks within this environment. 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 Code of Conduct.

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

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

To address these topics, the main provisions of the PEGI Online are:

- Only game content that has been appropriately rated by PEGI or another recognised European system can be included on a site.
- Appropriate mechanisms are in place to allow game players to report the existence of undesirable content on any related websites.
- 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.
- 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.
- Licence holders will maintain community standards to 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.
- All advertising shall be conducted demonstrating a sense of responsibility towards the public.

The PEGI Online label indicates whether a 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 all relevant information about the nature, categories and potential risks of online gaming. It contains useful tips for safer online game play and offers the possibility to report complaints or abuses by consumers.

PEGI FOR APPS



PEGI for APPS is a rating procedure specifically designed for small software applications, including but not limited to games, on digital platforms. It is designed to cater specifically to the needs of app developers and digital platform operators. It is not a new rating system, it is a more flexible and tailor-made procedure that allows mobile or digital platforms to use the classic PEGI rating system as it is known from boxed products and online titles. On top of that, it adds feature descriptors that inform a consumer about certain types of functionality in an app.

PEGI for APPS is currently used by Microsoft for the Windows Phone platform, but any mobile or digital platform on the market is welcome to adopt and implement the rating procedure.

What is the same?

- **the methodology:** the same tried and tested method of self-declaration followed by review is used.
- **the consumer experience:** users, who may or may not already be familiar with the PEGI system, will always see the same set of icons, indicating the minimum age that is advised for a game.
- **the criteria:** the fundamentals for determining the PEGI rating of a game's content remain in place.

What is different?

- **the workflow:** PEGI for APPS uses a post-release audit system to verify ratings. This means the license for a rating is issued immediately after the publisher has submitted an app. Designed like this, PEGI for APPS can cope with a very high volume of ratings and the need for quick turnover time to match the flexibility of digital distribution. It will avoid that the release of an app is delayed but ensures that correct ratings are given. In case an improper rating is given, this can be corrected instantly.
- **the price:** in the case of Windows Phone, there is no charge for a developer/publisher as the audit fee is carried by Microsoft as the platform holder.
- **the user interface:** PEGI for APPS is designed to be intuitive and fast. Submitting games only requires a very short time. Apps with barely or no inappropriate content for children are classified at once. Only as the amount and diversity of potentially inappropriate content increases, a few more questions need to be answered.
- **Feature descriptors:** many apps include functionality that improves the user experience, but nevertheless also warrants caution since consumers are not always aware of such features, like in-app purchasing or location data sharing. PEGI for APPS includes descriptors that indicate whether an app contains any of those features. These descriptors are not linked to specific age ratings, but rather operate alongside the age rating and its corresponding content descriptors.



The current feature descriptors are:



The app contains elements enabling the consumer to purchase additional content or functionality when the app is active, regardless of whether the app itself was acquired for free or not.



The app gives its developer (or a third party) access to personal data such as home address, contact details or bank account numbers.



The app contains the option to share exact location on a map when using the app. The location information may be shared publicly or with a specific network inside the app or elsewhere online.



The app includes an option for a user to chat with other users of the app. These users may operate under a pseudonym or anonymously.

Using PEGI for APPS involves five short steps:

- **Registration:** The game is entered into the database with information such as the title name, genre, developer name and locale.
- **Terms of use:** The developer will need to accept PEGI's conditions of terms of use by clicking a check box.
- **Classification:** The game is evaluated and classified by filling in a short form questionnaire.
- **Licensing:** The license generated by the system can immediately be downloaded by the developer. The licenses are not country-specific and contain an age classification, content descriptors and feature descriptors if applicable.
- **Finalisation:** The PEGI license is added to the submission procedure of the game.

IARC - To make regional ratings relevant in a globalised market

Another consequence of the growing popularity of mobile and online games is the global nature of that market. App platforms still have local storefronts for customers, but it became clear that app publishers are in need of a one-stop-shop – or something close to that – to get age classifications for their products.

Currently an international working group, including rating boards from Europe, US, Australia, Brazil and others, is developing a solution for this under the working title IARC (International Alliance for Rating Content): a list of questions that combines all the criteria of the different rating boards across the globe into one big flowchart.

Based on the input to those questions, the programme then produces classifications for all participating regions at the same time. Depending on cultural differences, these ratings may vary but it provides a publisher with a robust solution and takes away a lot of hassle. Because the PEGI system (and PEGI for APPS) is traditionally built on the principle of a questionnaire, it has been part of the project since the start.

PARENTAL CONTROL SYSTEMS

All gaming consoles, handheld game devices and operating systems for PC are equipped with parental control systems, enabling parents to block access to content that is unsuitable for their children and/or restrict access during certain hours.

There are varying methods of controlling access:

- select, case by case, which type of games your children can play
- restrict access to the internet
- control the amount of time that children can spend
- control the ability to interact with other players

Sony: <http://ps-playsafeonline.com>

Nintendo: <http://www.nintendo.co.uk/Support/Parents/Parents-642522.html>

Microsoft: <http://www.xbox.com/Live/Family>



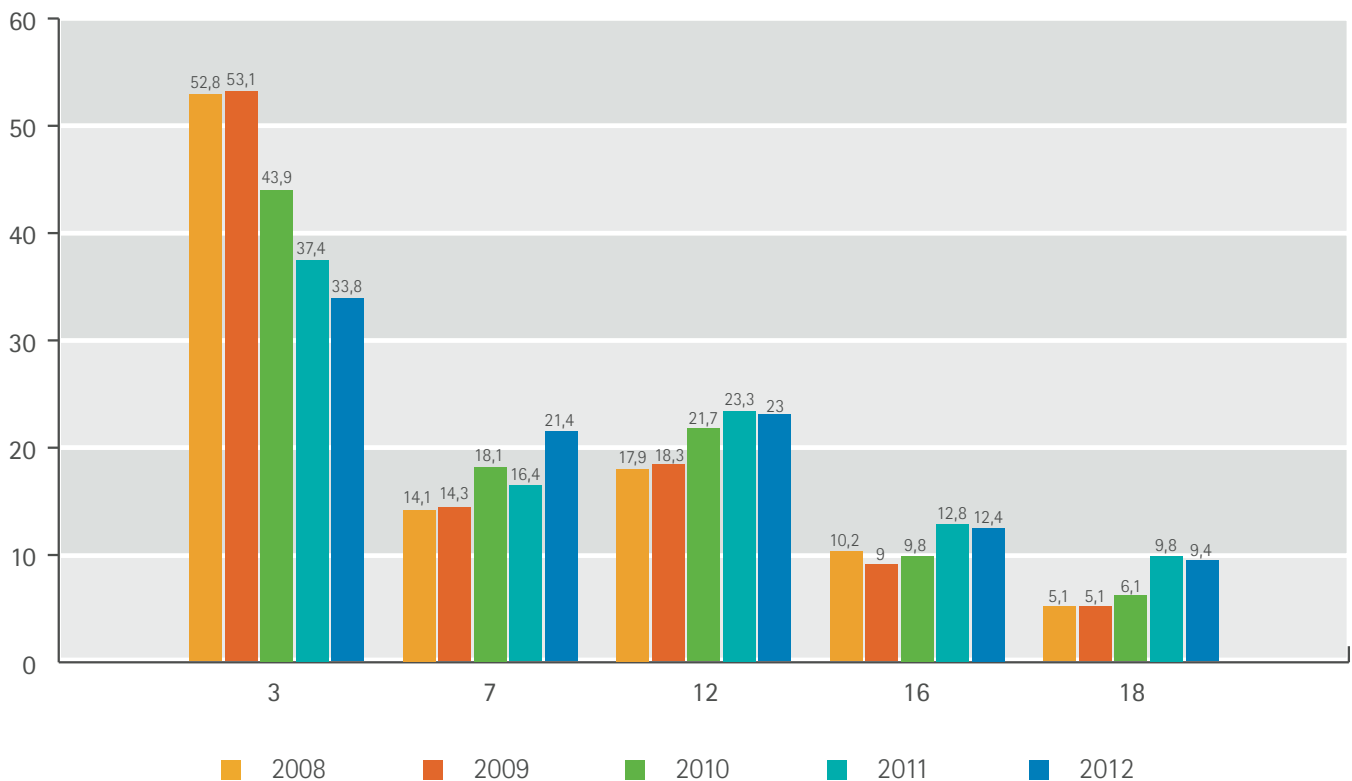
CHAPTER 2

Statistics

PEGI ratings by age until December 2012

Age class	2012	Percentage	Total	Percentage
3	613	33,8%	9350	46%
7	388	21,4%	2761	13,6%
12	418	23%	4467	22%
16	224	12,4%	2502	12,4%
18	170	9,4%	1225	6%
TOTAL	1813	100%	20305	100%

Distribution per age category in the last five years (in %)



	2008	2009	2010	2011	2012
Total Games rated	2479	2750	2538	2214	1813

Distribution of content descriptors (games rated in 2012)

Content Descriptor	Amount	%	Corresponding age categories
Violence	1001	55,2%	7,12,16,18
Online	512	28,2%	3,7,12,16,18
Bad Language	356	19,6%	12,16,18
Fear	188	10,4%	7
Sex	62	3,4%	12,16,18
Gambling	16	0,9%	16,18
Drugs	14	0,8%	16,18
Discrimination	0	0%	18

Distribution of the violence content descriptor across the age categories



7	12	16	18
291	339	202	169
29%	33,9%	20,2%	16,9%

Videogames in Europe Consumer Study

In 2012, ISFE published the Videogames in Europe Consumer Study, a multi-country survey designed to provide a better understanding of the societal context in which games are being played today in 16 European countries. It provides detailed consumer statistics about gaming habits, broader media interests, online gameplay, gaming in a family context and the PEGI age rating system.

The study used a combination of online self-completion surveys and offline interviews and targeted respondents aged between 16 and 64, including people who do and people who don't play video games from a broad and balanced demographic (gender, age, parents etc). In total, approximately 15.000 interviews were performed in the following countries: Austria, Belgium, Czech Republic, Denmark, Finland, France, Great Britain, Germany, Italy, Netherlands, Norway, Poland, Portugal, Spain, Sweden and Switzerland.

Awareness of PEGI Symbols



Awareness of PEGI age rating symbols:

51%



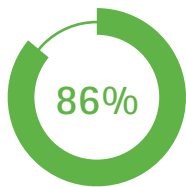
Awareness of PEGI content symbols:

33%

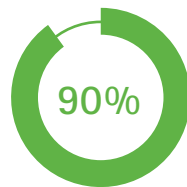
Given that only 1 in 4 Europeans plays video games on a regular basis, it is encouraging to see that more than 1 in 2 people recognise the PEGI age labels and that almost everyone finds them clear and useful.

Extent to which the symbols are

clear

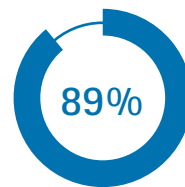


Age rating symbols

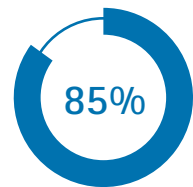


Content descriptors

useful



Age rating symbols



Content descriptors

% AGREE THAT PEGI RATING SYSTEM SHOULD APPLY TO...

- ▶ **66%** agree that the PEGI rating system should apply to app games and social network games.

WHETHER PARENTS BUY THEIR YOUNGEST CHILD'S GAMES

- ▶ **46%** of parents rarely/never buy games for their children
- ▶ **23%** do that always/most of the time

WHETHER CHILD PLAYS GAMES WITH A HIGHER AGE RATING THAN THEIR AGE

- ▶ **10%** of children often play games with a higher age rating
- ▶ **33%** never do so - according to the parents

USE OF PARENTAL CONTROLS

- ▶ **29%** of parents make use of parental control tools for 6 to 9-year-olds
- ▶ **27%** for 10 to 15-year-olds

The entire report can be found on the ISFE website: www.isfe.eu/videogames-europe-2012-consumer-study

Queries and complaints received via the 'Online Hotline'

The PEGI Administrator receives a sizeable amount of questions and objections each month about the PEGI rating system. These queries comprise a plethora of topics, but there is a clear trend that shows that the amount of technical questions and comments on ratings is on the decrease, while

the number of general requests for information about PEGI remains high. The familiarity with the PEGI system has grown strongly over the past years, which is reflected in the numbers.

	2009	2010	2011	2012
Complaints related to rating delivered	240	106	55	71
Complaints concerning advertising	16	14	0	7
Requests for information on PEGI	430	501	711	554
Comments on PEGI System	94	71	22	36
Questions and comments on ratings	160	322	193	178
Complaints via pegionline.eu	-	115	48	113
Other	163	88	109	122
Technical difficulties	558	467	413	313
TOTAL	1661	1684	1551	1394



Some typical examples of information requests

Questions or comments about a rating

“I played Little Big Planet 2 with my son, as it’s rated 7, but the things we could read on the screen were disgusting. Swearwords and sexual expletives, it was disgraceful. I’m very unsettled as I thought this game was for kids, but it turns out not to be very childfriendly.”, B.H.

► PEGI reply:

Dear B.,

Little Big Planet 2 has a PEGI 7 rating, accompanied by a violence content descriptor (cartoonish violence) and an online content descriptor, because the game allows you to play online with other players. Since we cannot predict and therefore classify inappropriate content generated by users of a video game, we can only warn about the risks involved when interacting with other players. The Online content descriptor indicates that such an online mode is present in the game, allowing parents to monitor the online behavior themselves.

Name of the interactive software:

Little Big Planet 2

Name of the publisher:

Sony

Platform of the interactive software:

Playstation 3

Questions or comments about a rating

“ I am enquiring as I don’t understand your rating. I have a 15-year-old son who is interested in purchasing ‘Assassin’s Creed 3’ but when we look for it, it says “PEGI 18” with “provisional” underneath. Now, I know the definition of provisional but does that mean it’s subject to change on release? My son has been telling me that the previous games have been rated 18 by PEGI but only 15 by the BBFC, yet I know that PEGI has become the official rating now in the UK. Will that mean it becomes a 16 instead of a 15? Please help me as I don’t want to order it to find out on the day it is an 18. ”, H.N.

► PEGI reply:

Dear H.,

Please allow me to explain why we have a provisional rating. Prior to the release of a game, a publisher completes an on-line content assessment form, taking into account the possible presence of violence, sex and other sensitive content. Based on that declaration, PEGI allocates a provisional age rating along with content descriptors. A publisher is allowed to use this rating in a marketing campaign, on the condition that the provisional nature of the rating is indicated. Meanwhile, the PEGI administrator receives all relevant game material from the publisher in order to doublecheck the provisional rating. If it is correct, the publisher is issued with a license, after which the rating can be communicated without the ‘provisional’ disclaimer. So yes, when you see a provisional PEGI rating, it could still change before the game is actually available in stores (which happens sometimes, but not often). Unfortunately we are not allowed to disclose further information about the game in question at this point. If you want to be absolutely sure that you are not buying an 18-rated game for your son, we can only advise you to wait until the day of release.

Name of the interactive software:

Assassin’s Creed 3

Name of the publisher:

Ubisoft

Platform of the interactive software:

Xbox 360

Complaints related to the rating delivered to a game

“I am writing to PEGI to lodge a complaint about the rating of Mario and Sonic at the London 2012 Olympic Games for the Wii because it encourages gambling. It gives the player “1 scratchcard” for completing any event with which various items to enhance/aid gameplay can be won. If you fail to win an item, the card goes on a “blank card” pile, allowing you to buy items from the blank exchange store. This will make players want to win lots of scratchcards, to save up blanks and buy stuff in the store. In my opinion this is encouraging youngsters to gamble. It is appalling that SEGA is allowed to get away with this, whilst Nintendo were told in 2009 they had to remove the game corner from “Pokemon Platinum”. When asked about the removal, they said it was “to comply with PEGI guidelines concerning gambling”. It seems you have concerns about one of the biggest franchises of Nintendo having a small bit of gambling in it, but not when it comes to “Mario and Sonic at the London 2012 Games”.„ A.L.

► PEGI reply (edited for brevity):

Dear A.,

What we warn for with regards to gambling is the following: “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 in casinos, gambling halls or racetracks. This does not cover games where some type of gamble is simply part of the general storyline. The game must actually teach the player how to gamble or bet, or encourage the player to gamble for money in real life. This may include teaching card games like blackjack or poker or how to play the odds in horse racing. This type of content leads to a PEGI 12 rating or higher. If a publisher doesn't want that, they are free to alter the game to get a lower rating. That decision is entirely up to the publisher. The content you describe in ‘Mario and Sonic at the London 2012 Olympic Games’, is not seen as gambling, it's a reward system that many games use.

Questions or comments about a rating

“In a scene at the end of [deleted to avoid spoiler], the main character has sex with a woman, even though there is no information about sex! There is also drug usage in the game, with no information about that either.„ R.S.

► PEGI reply (edited for brevity):

Dear R.,

Indeed, the game contains sexual content. But because that content is classified lower (PEGI 16 – depictions of sexual intercourse without visible genitals) than the violence in the game (PEGI 18), it does not show up as a content descriptor (the same argument goes for the drugs use). Since the content descriptors work in conjunction with the age rating, showing the content descriptor for sex would lead consumers to believe that there is sexual content rated at 18 in the game. To communicate clearly, PEGI can only show the content descriptors that are linked to the age category given to the entire game. We believe that people who can handle violence at the 18 level can also cope with sexual content that corresponds with a PEGI 16 rating.

Name of the interactive software:

Mario and Sonic at the London 2012 Games

Name of the publisher:

SEGA and Nintendo

Platform of the interactive software:

Nintendo

Name of the interactive software:

[-]

Name of the publisher:

Ubisoft

Platform of the interactive software:

Xbox 360

Questions or comments about a rating

“ TERA Online received a PEGI 12 rating even though the game originally aims at an adult audience. The game has been rated for adults in Korea, and 'M' for Mature in North America. We, the player base, are concerned with how this will affect the European title. We're expecting to get massively delayed content, or to be denied content updates entirely because of this faulty rating. Already now we're experiencing content being censored out of our version of the game, a game we paid full price for, expecting to get the same product as the other two regions. What would it take for the game to be re-rated to PEGI18, and how long would that take? I personally feel very cheated on by this publisher and I hope something can be done about this. This game was never designed to be played by children.,, R.S.

► PEGI reply (edited for brevity):

TERA was examined by the administrator, and as always the entire code was provided by the publisher, including video footage of all the crucial elements in the game. TERA was given a PEGI 12 based on question 22 (unrealistic violence towards humanlike characters), question 26 (mild swearing) and question 36 (online content) of our questionnaire. It is important to note that PEGI does not censor games, it only classifies games. When a publisher submits a game, PEGI examines it and awards an age rating. Before a rating becomes final, a publisher is free to decide to alter content, which may affect the age rating, but PEGI plays no role in this. In the case of TERA, although elements may have changed during the beta-stage, no content submitted to PEGI was changed with the purpose of altering the age rating.

Name of the interactive software:

TERA

Name of the publisher:

Frogster

Platform of the interactive software:

PC



CHAPTER 3

The PEGI Organisation

THE PEGI STRUCTURE

PEGI S.A.

The day-to-day management, supervision and development of the PEGI system is handled by PEGI S.A., an independent not-for-profit company with a social purpose established under Belgian law. Drawing on wide experience, PEGI is steered by way of a number of boards and committee as envisaged in article 12 of the PEGI Code of Conduct:

PEGI Management Board

The PEGI Management Board is at the core of the PEGI organisation. The Managing Director, responsible for running the day-to-day activities of PEGI, follows the guidance of this Management Board. The board is made up of representatives of the users of PEGI (games publishers), the gatekeepers of PEGI (the game console manufactures) and the promoters

of PEGI (national trade associations) plus representatives from the PEGI Council and the PEGI Experts Group. This board structure ensures there is proper oversight whilst not weakening PEGI's strength in getting things done efficiently. The importance of effective action via a coalition from within PEGI cannot be overstated.

Name	Company or trade association
Tiffany Steckler	Electronic Arts
Greg Ward	Microsoft
Matthew Hill	Nintendo
James Armstrong	Sony Computer Entertainment Europe
Seb Belcher	TakeTwo
Christele Jalady	Ubisoft
Antonio Xavier	Chairman of the PEGI Council
Jeffrey Goldstein	Chairman of the PEGI Experts Group
Henk Hoogendoorn	NVPI/BEA (Benelux)
Jean-Claude Larue	SELL (France)
Maximilian Schenk	BIU (Germany)
Thalita Malago	AESVI (Italy)
Dominika Urbańska	Spidor (Poland)
Alberto Gonzalez	Lorca van Adese (Spain)
Maria Tjärnlund	MDTS (Sweden)
Jo Twist	UKIE (United Kingdom)

PEGI Council

With PEGI in use in over 30 countries it is vital that the system and the Code of Conduct keeps in tune with social, political and legal developments in all of these countries. The Council is responsible for making recommendations to ensure that national as well as European developments are communicated and reflected in the PEGI system and its Code of Conduct. The Council gives the PEGI countries a voice. Equally important is that the authorities in the

PEGI countries stay abreast of and are involved in PEGI. The Council ensures this two-way flow of information: members of the Council are appointed for a 2-year term and they are primarily recruited from the authorities in the PEGI countries, working as civil servants, psychologists, media specialists and legal advisers versed in the protection of minors in Europe.

PEGI Council members

Name	Institution	Country
Antonio Xavier	Film Classification Commission	Portugal
Herbert Rosenstingl	Ministry for Health, Family & Youth	Austria
Axenia Boneva	Bulgarian Ministry of Culture	Bulgaria
Andreas Christodoulou	Ministry of Interior - Media section	Cyprus
Anne Mette Thorhauge	Danish Media Council	Denmark
Riina Valvere	Ministry of Culture, media department	Estonia
Maarit Pietinen	Finnish Centre for Media Education and Audiovisual Media	Finland
Ger Connolly	Irish Film Censor's Office	Ireland
Regina Jaskleviciene	Ministry of Culture, Information society, development	Lithuania
Tom Krieps	Conseil National des Programmes	Luxembourg
Jeanine Rizzo	Ministry of Culture	Malta
Nezha Bouanani	Ministry of Education, Culture and Science	Netherlands
Thomas Hepsoe	Norwegian Media Authority	Norway
Rafal Lew-Starowicz	Office of the Government Plenipotentiary for Equal Treatment	Poland
Carlos Arnaiz	Instituto Nacional del Consumo	Spain
Thomas Vollmer	Bundesamt für Sozialversicherungen, Leiter Jugendschutz	Switzerland
Audrius Perkauskas	EU Commission, DG Information Society and Media	EU
Toine Manders	EU Parliament	EU
Laurie Hall	Games Rating Authority	United Kingdom

The Council meets at least once a year, often in conjunction with the Management Board and/or the Experts Group.

PEGI Experts Group

With the Council focusing on country representation it was considered important not to lose the network of technical experts that have been an important source of advice for PEGI over the years. The Experts Group involves specialists and academics in the fields of media, psychology, classification, legal matters, technology, digital environment, etc. They advise PEGI by considering technological and content-related development as recommended by the PEGI Council, the PEGI Management Board or through circumstances brought to light by the complaints procedure.

Name	Country
Jeffrey Goldstein	Netherlands
Spyros Pappas	Greece
Alexander Ipfelkofer	France
Mark-Philipp Hugo	Germany
Konstantin Mitgutsch	Austria
Rosemary Walker	UK
Jeroen Jansz	Netherlands
Anne Mette Thorhauge	Denmark

Complaints Board

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

Complaints Procedure

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

The board meets in person if necessary or, if acceptable, considers the facts individually and confers via email or telephone. Decisions by the Complaints Board are passed by simple majority vote. If the board concludes that a publisher

is in breach of any part of the Code of Conduct, it has the authority to instruct the Enforcement Committee to take appropriate measures. If the board concludes an entertainment software product has been inappropriately rated, it can order a re-rating. Subscribers to the PEGI system, e.g. publishers, are bound by decisions taken by the Complaints Board by virtue of the Code of Conduct. Consequently, subscribers find themselves under obligation to carry out any corrective actions required of them and, in cases of non-compliance, are subject to sanctions as laid out by the code.

Complaints Board members:

Name	Country
Lars Gjerlufsen	Denmark
Olivier Gerard	France
Jeroen Jansz	Netherlands
Ger Connolly	Ireland
Jeffrey Goldstein	Netherlands
Spyros Pappas	Greece
Rosemary Walker	UK
Antonio Xavier	Portugal
Hanna Hoppo	Finland

THE FOUNDER: ISFE

The Interactive Software Federation of Europe (ISFE) was established in 1998 to represent the interests of the interactive software sector vis-à-vis the EU and international institutions. Initially founded by the national interactive software trade associations in the UK, France, Germany and the Netherlands, ISFE was enlarged in January 2002 to include

any transnational company representing the industry within the 27 Member States plus Norway, Iceland, Switzerland and Liechtenstein. Today, ISFE membership comprises 11 major publishers of interactive software and 16 interactive software trade associations throughout Europe.

**3**www.pegi.info

THE PEGI ADMINISTRATORS

NICAM



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

NICAM is led by Director Wim Bekkers since its establishment in the year 2000, with the goal to provide an effective and uniform system of classification for all audiovisual

media. NICAM draws up classification guidelines, deals with complaints and provides consumers with information about video games, films, TV programmes and DVDs.

As an administrator for PEGI, NICAM combines various tasks in close cooperation with PEGI S.A. and the VSC. The team pre-examines all 3 and 7 ratings prior to release and manages relationships with coders (a publisher's single point of contact) and consumers (handling all consumer queries, complaints and comments that come in via the public PEGI.info website). In addition to this, they are responsible for all coder training activities, and together with the VSC they are actively involved in the technical development of the PEGI system.

VSC



The Video Standards Council examines all games applying for a 12, 16 and 18 rating under the PEGI system to ensure that such games have been correctly rated. In 2012 the VSC became the statutory body in the UK for legally classifying games using the PEGI system, operating under the name Games Rating Authority. The VSC was established at the request of the UK Government in 1989 as a non-profit making body set up to develop and oversee a Code of Practice designed to promote high standards within the video industry.

In 1993 the Code was expanded to promote high standards within the video games industry. The VSC membership covers all sectors of the video and video games industries.

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

CHAPTER 4

PEGI Communication tools and activities

INTRODUCTION

There is no one-size-fits-all solution when it comes to spreading the word about PEGI: the system is used in more than 30 countries and targets millions of people from different cultures, speaking different languages. But this diversity also offers opportunities: successful ideas can be shared and implemented in other countries as well. To reach out efficiently to the largest possible group of consumers, PEGI S.A. runs an annual communication programme in which national trade associations devise local strategies in cooperation with the PEGI organisation. One set of communication tools is developed centrally so different territories can always rely on the basics

(website in local language, brochure, videos, graphic tools, etc.). Country-specific actions build on this to reach particular audiences, often in conjunction with other local institutions or organisations and popular events. As a general rule, parents are the center of attention, but there is a growing focus on retail as well: educating retail chains, store managers and assistants about PEGI and how to explain it to customers with questions. Next to that, teachers and schools, press, game developers and distributors, authorities and decision-makers, they are all crucial partners to boost the general awareness of PEGI as the widely accepted rating system for video games.

Some examples of 2012 activities:

Denmark: Spørg om Spil

Parents have a multitude of questions regarding video games and ratings and to address these as directly as possible, the website Spørg om Spil ("ask about games") was launched with a press release, a traveling information booth and a leaflet campaign in the largest games retailer. Everybody with a question was invited to send it to a panel of experts from universities across the country. The response by one of the experts was e-mailed to the person in question and added to the website. Over time, the website will generate a list of frequently asked questions that deals with the most urgent concerns of parents.



Italy: No Play Without Safety

Making use of popular social networks, an online awareness campaign was set up with a specific focus on mothers. A PEGI quiz was promoted with the help of a few popular mommy bloggers and on Facebook, while retailer GameStop provided weekly prizes. The second edition of Games Week in Milan attracted more than 40.000 visitors, who were invited to visit a specific area set up for PEGI where families were instructed in a playful way about PEGI and parental controls on game devices.



Norway: Play as a Team

The 2012 campaign by the Norwegian Media Authority focused on encouraging parents to play games with their children, in order to better understand games and make more informed choices. Using a Facebook quiz, people could test their knowledge of PEGI and learn about the details of the system.

Poland: Watch What I'm Playing



A broad press campaign brought the message of PEGI to a wide variety of print and online publications, targeting parents or fathers (przehladsportowy.pl) and mothers (ofeminin.pl) specifically. To increase the visibility of PEGI in shops, a set of materials was produced and distributed among retailers.

Spain: Comic strip brochure

Continuing the partnership with local retail stores, a comic strip PEGI guide was produced and distributed (240.000 copies) in 737 shops (from GAME, Gamestop, Carrefour, Eroski, Toys-R-U's and Videooca).



Sweden: PEGI Education Tour

By now a yearly tradition, an Education Tour was organised in collaboration with the Swedish Media Council, educating teachers and students, but also visitors of libraries, community halls and cultural establishments about PEGI, video games in general and responsible internet behavior. At Gamex, the biggest video game exposition in the Nordic region, PEGI was present in the Kidz Corner where parents could ask questions, take part in a PEGI quiz and receive PEGI goodies.

United Kingdom: Control.Collaborate.Create.



To mark the introduction of PEGI as the single video game age rating in the UK, the Control.Collaborate.Create. campaign was launched, encouraging understanding of the new age rating system and the benefits of collaborative and creative family gaming. Various activities were conducted, including a refresh of www.askaboutgames.com and creation of a parent-focused video explaining the age ratings. In addition, family gaming workshops in high-street stores and a competition to find the most collaborative gaming family were conducted. Over 300 pieces of media coverage were generated over the course of the campaign, raising the profile of PEGI to millions across the regions.

Other pan-European activities:

PEGI app for iPhone, Android and Windows Phone:



PEGI has produced apps for all mobile platforms to allow consumers to browse the database of all the video games that have received a PEGI rating (more than 20.000 games). When looking up information about the content of a game, the app

not only provides the age rating and information about why a particular rating was given, there is also the possibility to read reviews and see screenshots of the video game, provided by the independent video games website Eurogamer.net.

Website

The PEGI website www.pegi.info provides comprehensive information to parents, caretakers and other consumers in 25 languages. The website contains a search engine to look up age rating information about every game that received a PEGI rating, straightforward explanations about the meaning of the labels, the classification process and the PEGI organisation. In addition, visitors can learn more about the different game genres, the use of games in education, gaming behavior, parental control tools and the use of pirated games. In 2012, the website again recorded a strong increase in visitors. With 5.2 million visitors in total (an average rate of

14,200 visits per day), that is an increase of 5% compared to 2011 (5 million visitors, 2010: 4.3 million visitors). The visits accumulated to just under 10 million page views, with a clear preference for the following pages (not including the homepage):

1. What are ratings?
2. Advanced database search
3. What do the labels mean?
4. Tips for parents
5. Did you know?

(source: Google Analytics)

PEGI Congress

On the 29th of November 2012, the second PEGI Congress took place in Berlin. More than 110 representatives of the different PEGI committees, videogame publishers, parent associations, government organisations, international rating boards and academic research faculties participated in a day of interactive sessions to discuss the current status and the future of age classification of video games and online minor protection in general. At the congress, PEGI and the German rating organisation USK investigated what binds and separates them in order to understand how further cooperation is possible. In the same vein, a panel of international rating boards looked at how mobile apps (including but not limited to games) would be examined by their respective organisations and standards. This comparison was a practical exercise to show the relevance of IARC, an international project that aims to aggregate ratings from regions across the globe into one process, while taking cultural, political and legal sensitivities into account. In another session, speakers shed some light on technical solutions to

protect minors from inappropriate content on the internet. Opening data to ensure that PEGI ratings are used as much as possible in technical solutions (parental controls tools) was one of the suggestions that PEGI is now investigating. Presentations, videos, photos and more from the Congress: www.pegicongress.com



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 AND MAINTENANCE OF SAFE ONLINE GAMEPLAY

Article 1: SCOPE

1.1 The present Code shall apply to all interactive software Products including videoproducts, computer products and education/reference works, distributed for retail sale by all publishers or other organisations which sign an agreement with ISFE to comply with this Code.

1.2 This Code shall also, where practicable, cover all Products distributed electronically by whatever means, such as via the Internet or mobile telephony including on-line retailing of packaged products and on-line distribution of products which, in each case, are intended for play in territories where the PEGI System applies.

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

1.4 The rules contained in this Code shall, where indicated, also apply to Products which offer Online Gameplay ('Online Gameplay Environment').

1.5 All capitalised terms in this Code have the meanings given to them in the standard PEGI Agreement between ISFE and Publishers unless otherwise indicated in this Code.

Article 2: PURPOSE

This Code reflects the interactive software industry's commitment and concern both to provide information to the public on the content of interactive software products in a responsible manner and also to ensure safe online gameplay for children. 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 minimum age 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 an interactive software product 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.

2.4 Fourthly, this Code reflects the interactive software industry's commitment to provide a safe environment where children utilise interactive software products online.

Article 3: INSTRUMENTS

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

3.1 The PEGI System operated by PEGI S.A. (see 3.3 below) with the assistance of the Administrator resulting in the granting of licenses to use the Logos and the Descriptors. PEGI retains at all times the right to rescind or recall any Logo or Descriptor assigned to a product.

3.2 An Online Safety System to be known as the "PEGI Online" which shall, where practicable, apply to Products offering Online Gameplay and will result in the granting of licenses to use the PEGI Online Logo.

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

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

3.5. A Council ("PC"), Experts Group ("PEG") and developer Group ("PDG") including representatives from chief stakeholders (parents, consumers associations, child psychology experts, academics,

media experts and the interactive software industry - see Article 12 below) These bodies will advise on the continuing adjustment of the Code to take account of social, political, legal and technological developments. The PEG and PDG shall be in charge of considering technical developments (in their respective fields) that may impact of the PEGI and PEGI Online System.

3.6 A Complaints Board ("PCB") including, in the same manner as the PC, representatives from chief stakeholders, (see Article 13 below) and entrusted with the two following tasks:

- handling possible complaints about the consistency of advertising, marketing and promotional activities of any User with the age rating finally attributed or likely to be attributed under the PEGI System.
- handling conflicts about the PEGI System age ratings themselves including any User or consumer complaints about those ratings.

3.7. An Enforcement Committee ("PEC") including, in the same manner as the PC, representatives from chief stakeholders which is in charge of implementing the recommendations of the PMB, and, more generally, of seeing to the enforcement of the rules and sanctions included in the present Code, including decisions of the PCB (see Article 14 below).

3.8 A Legal Committee ("PLC") in charge of securing the ongoing coherence of the PEGI System with national legal frameworks.

Article 4: PEGI's COMMITMENT TO THE CODE

PEGI hereby commits to:

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

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

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

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



Article 5: OBLIGATIONS OF SIGNATORIES

Signatories shall:

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

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

5.3 when concluding new terms and conditions of sale with distributors and wholesalers of their Product, include a term providing that those distributors and wholesalers, by way of a standard clause in their respective terms and conditions of sale with retailers (example below), recommend that those retailers and their employees, when engaged in face to face transaction with customers, ensure compliance with the PEGI Retail Code (see Annex B) and, in particular, do not sell Product to those customers

in contravention of the specified PEGI age rating. Sample Standard Clause: 'The Distributor (Wholesaler) recommends to the Retailer that they and their employees, when engaged in face to face transactions with customers, comply with the PEGI Retail Code and, in particular, do not sell Product to those customers in contravention of the specified PEGI age rating.'

5.4 when concluding new terms and conditions of sale with retailers of their product recommend to those retailers, by way of a standard clause in the terms and conditions (example below), that they and their employees, when engaged in face to face transactions with customers, should comply with the PEGI Retail Code (see Annex B) and, in particular, do not sell Product to those customers in contravention of the specified PEGI age rating. Sample Standard Clause: 'The Seller recommends to the Retailer that they and their employees, when engaged in face to face transactions with customers, comply with the PEGI Retail Code and, in particular, do not sell Product to those customers in contravention of the specified PEGI age rating.'

Article 6: LEGAL AND REGULATORY ENVIRONMENT

Signatories shall ensure that the content, distribution by any means, promotion and advertising of the products covered by this Code comply at all times with existing and future laws and regulations at EU and national 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 made available by physical or electronic means.

Article 7: PEGI SYSTEM - AGE RATING

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

7.1 Prior to product release, Signatories shall, for each product and format thereof complete an Assessment File.

7.2 The Assessment File shall generate an age rating Logo and the Descriptors indicating the reasons for classification of the Product in a specific age category.

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

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

7.4.1 The Administrator shall review all products in full before deciding whether to approve the age rating by granting a licence to use the Logo and Descriptors except in the case of Products subject to the PEGI Express system where age ratings utilised can be verified by the Administrator after the Product is made available to the public.

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

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

Article 8: PEGI ONLINE SYSTEM

The main features of the PEGI Online System are described in this, and in the following, article.

8.1 The Administrator shall evaluate the ability of the User to comply with the commitments of the PEGI Online system described in Article 9 below in light of answers and material provided by the User as

part of the PEGI System described in Article 7 above as far as Online Gameplay Environments (defined in Article 1.4 above) are concerned.

8.2 If the Administrator so decides, the User will be issued a licence to reproduce the PEGI Online Logo and to post it on its Online Gameplay Environments in accordance with guidelines enacted by the PEC.

Article 9: PEGI ONLINE - CONDITIONS FOR ONLINE GAMEPLAY ENVIRONMENTS

9.1 Rated Contents Products offering Online Gameplay Environments operated by Signatories will, where practicable, be appropriately rated under the PEGI System. This provision will not apply to game content which is posted on the Online Gameplay Environment operated by the User but which is not under the User's control, such as user-generated content.

9.2 Removal of Undesirable Content Signatories shall use their best endeavours to ensure that Online Gameplay Environments are kept free of content which is illegal, offensive, racist, degrading, corrupting, threatening, obscene or might permanently impair the development of minors. When Online Gameplay Environments also contain user generated content, Signatories shall use their best endeavours to immediately take down any such content which is illegal, offensive, racist, degrading, corrupting, threatening, obscene or might permanently impair the development of minors. Observance of all the foregoing should, where possible, also include removal of undesirable links or 'hyperlink'.

9.3 Appropriate Reporting Mechanisms Consistent with the foregoing paragraph, Signatories will ensure that appropriate reporting mechanisms are in place to allow players to notify Signatories of the existence of content such as described in the previous sub-section within any Online Gameplay Environment.

9.4 Chatrooms Signatories should take reasonable precautions to ensure that Online Gameplay Environments which allow voice or video chat, protect children from access to age-inappropriate content introduced by other users.

9.5 Other Operators Signatories shall use their best endeavours to ensure that operators of Online Gameplay Environments offered by Products published by the User and which are authorised by, but not under the control of, the User, abide by these rules and/or subsequently become Signatories themselves.

9.6 Safety Warnings Signatories shall advise users of Online Gameplay Environments under their control of the desirability of taking occasional breaks from Online Gameplay.

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

9.8 Privacy Any User 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 users who shall be given full details of the User's Privacy Policy an Online Gameplay Environment. Subscribers must be also be given the opportunity to comment on any perceived misuse of their personal details and therefore be fully advised as to ways, for example, of avoiding unsolicited or unwanted e-mail contact.

9.9 Protection of Minors In keeping with one of the main objectives of both the PEGI and PEGI Online Systems, Signatories shall adhere to stringent standards ensuring the protection of children from any unsuitable content and behaviour associated with any Online Gameplay Environment offered by any Product aimed at children. These standards shall include, as appropriate;

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

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

Article 10: LABELLING

10.1 The PEGI Online Logo and the PEGI Logo and Descriptors shall appear on or in connection with the product in a size that permits the message to be legible and clearly visible to the consumer at the point of sale, in accordance with the templates set out in the Advertising and Labeling Guidelines as are made available by PEGI from time to time.

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

10.3 Signatories shall ensure that the PEGI Online and the PEGI Logo and Descriptors 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.

10.4 Signatories should use their best efforts to encourage online service providers carrying those Signatories' products, or advertising for those products, but not under the Signatories' control to display the ratings for those products on those online game play services.

10.5 The PEGI Online Logo should provide a direct hyperlink to a dedicated website where appropriate information will be given regarding the risks arising from the fact that content created in the course of gameplay may be unknown to the original publisher. Alternatively and where appropriate, POSC Signatories shall display the URL associated with the said dedicated website in a prominent position visible to users of Online Gameplay Environments.

Article 11: ADVERTISING AND PROMOTION

11.1 Advertising materials shall follow the PEGI Labeling and Advertising Guidelines and in particular show the age rating granted to the Product concerned or, should the license be pending, show the final age rating expected, taking the higher age category as a reference in case of doubt.

11.2 The design of print, broadcast and on-line advertising of Products shall comply with laws and regulations applicable to the age category concerned.

11.3 More generally, the following principles shall apply:

i. All advertisements shall accurately reflect, to the best extent possible both the nature and content of the product publicized and the rating associated with that product. Advertisements should not mislead consumers as to the product's true character.

ii. Advertisements shall not in any way exploit a PEGI System rating of a product as such rating is intended as a recommendation only.

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

iv. All advertisements shall aim to avoid content that is likely to cause serious or widespread offence to the average consumer targeted.

v. Signatories shall not specifically target advertising for entertainment software Products rated 16 or 18 to consumers for whom the product is not rated as appropriate.

vi. Signatories shall ensure that ancillary or separate products that are being sold or promoted in association with a core product contain content that is appropriate for the audience for which the core product is intended.

vii. Signatories shall not enter into promotion of 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 Product is not rated as appropriate.

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



Article 12: PEGI COUNCIL, LEGAL COMMITTEE, EXPERTS AND DEVELOPER GROUP

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

The PC comprises:

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

The PEG comprises:

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

The PDG comprises:

- developers of video games of the type rated or potentially rated by PEGI
- other videogame industry experts,
- other experts in their field as considered appropriate and necessary.

The PLC comprises:

- lawyers expert in European minor protection laws,
- videogame industry experts,
- academics,
- other experts in their field as considered appropriate and necessary.

Article 13: COMPLAINTS BOARD

An independent Complaints Board ("PCB") 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 User with the age rating finally attributed or likely to be attributed under the PEGI System;

- handling possible rating conflicts between Signatories and the PEGI System,
- processing age rating complaints by consumers.

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

Article 14: ENFORCEMENT COMMITTEE

Compliance with this Code, the provision of advice to all companies deciding to subscribe to the Code as well as to its Administrator and the possible imposition of sanctions on Signatories infringing the Code, shall be entrusted to the PEGI Enforcement Committee

("PEC") which shall be made up an equal number of carefully selected representatives of the industry and PC members, as nominated by the PMB.

Article 15: INFRINGEMENT, CORRECTIVE ACTION, SANCTIONS AND ARBITRATION

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

15.2 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 the Logos and Descriptors,
- recall of inaccurately labelled product,
- modification of advertisements both on and offline

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

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

Violations warranting these sanctions include

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

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

15.5 Any PEC decision imposing a sanction on a User can be referred by that User, 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.



APPENDIX A

BREACHES OF THE CODES OF CONDUCT AND RELATED SANCTIONS

LEVEL I. VERY SERIOUS

Failure to Disclose Significant Content

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

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

SANCTIONS

First Breach; 100,000 to 250,000 Euro Fine
 Second Breach; 250,000 to 500,000 Euro Fine
 Third Breach; 500,000 Euro Fine

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

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

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

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

LEVEL II. SERIOUS

These include the following:

- Negligence leading to a failure to disclose significant aspects of a product which would have led to the assignment of a higher age rating to that product than the rating actually displayed on the product when sold to the public. 'Negligence' will be held to exist where the content has been assessed but, through error or omission, content significant to the rating assigned has not been taken into account.
- Failure to comply with a sanction imposed by the PEC
- Failure to respond to an inquiry by the Administrator or the PEC
- Failure to submit changes, updates, or modifications that materially concern the age rating assigned to a product and are made after the product has received that rating.
- Using PEGI logo or content descriptors which have not been assigned by the Administrator by way of licence.
- Failure to display a PEGI age rating or display of an incorrect PEGI rating
- Failure to display a PEGI content descriptor or the display of incorrect content descriptor
- Presenting deliberately misleading or incomplete material to support an original application for a PEGI Online license
- Unlicensed display of the PEGI Online Logo
- Using advertising which is inconsistent with a PEGI rating (not 'very' serious) or which exploits a PEGI rating by, for example, drawing attention to an 18 rating as a device to encourage sales of the product concerned.
- Using advertising which is offensive or which otherwise does not reflect a sense of responsibility towards the public or to the PEGI System.

SANCTIONS

First Breach; 5,000 to 20,000 Euro Fine
 Second Breach; 20,000 to 50,000 Euro Fine
 Third Breach; 75,000 Euro Fine

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

LEVEL III ADMINISTRATIVE/OPERATIONAL

Failure to display correct PEGI rating on Demo or Trailer

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

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

SANCTIONS

First Breach; up to 5,000 Euro Fine
 Second Breach; 5,000 to 7,500 Euro Fine
 Third Breach; 10,000 Euro Fine and/or a period of disqualification from the PEGI Rating System depending on the severity of the breach

ALL LEVELS - RETRAINING OF CODERS

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

ALL LEVELS – SYSTEMATIC SCREENING OF FUTURE PRODUCT

In all levels and cases of breaches of the Code of conduct the PEC may require systematic screening of product to be released in the future for a period to be determined and also the payment of any additional costs caused by this measure.

ALL LEVELS - BREACHES AND TIME LIMITS

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

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

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

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

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

ALL LEVELS - PUBLICATION OF DECISIONS

The PEC reserves the right to publicise details of all and any sanctions imposed for breaches of the Code of conduct.

APPENDIX B

PEGI RETAIL CODE

The Code applies to retailers in the European Economic Area territories and in Switzerland who have signed this Code and covers computer and video products that have been rated under the Pan European Game Information (PEGI) rating system. Retailers adopting this Code must use best efforts to comply with the policies outlined below when engaged in face to face transactions with customers.

Each signatory of this Code agrees to:

1. Train all appropriate managers, clerks and/or other employees so that they are familiar with the PEGI age ratings system and the policies adopted in this Code;
2. Display in a conspicuous location where product is displayed signage describing the PEGI age rating system;
3. Treat the PEGI age recommendations as mandatory and use reasonable endeavours to ensure that computer and video games are not supplied to persons below the specified age;
4. Assess existing internal policies, practices and procedures on ratings education and policy enforcement and make improvements where necessary to maintain compliance with the Code;
5. Clearly and conspicuously display rating symbols and, where feasible, content descriptors, in all advertising, marketing and promotion of games;
6. Where practical, endeavour to keep a refusals record when sales of PEGI labelled products are refused to customers of inappropriate age;
7. Respond to customer complaints about non-compliance with the Code and keep a record of such complaints;
8. Advise customers to submit a complaint at the PEGI website (www.pegi.info) when a complaint cannot be resolved at the store level;
9. Regularly share information on best practices to further develop and improve compliance with this Code;
10. Accept that, if a User has failed to fulfil the letter and spirit of the Code, PEGI may provide notice to the User summarizing the deficiency and provide a period of 30 days to improve, after which time PEGI may determine that the Signatory has not made sufficient improvement and exclude him from the Code;
11. Be entitled to terminate its participation in the Code at its sole discretion by providing written notice of such termination to PEGI;



ANNEX 2 - PEGI signatories

Publisher Company	Country
10Tacle Studios AG	Germany
11bit Studios s.a.	Poland
1bit garden limited	United Kingdom
1C Publishing EU s.r.o.	Czech Republic
20Q.net Inc.	Canada
24 Caret Games	United States
2D BOY	United States
2XL Games, Inc	United States
345 Games-MTV Networks	United States
46 To Shinjuku Medialab, SL	Spain
505 Games Srl	Italy
8floor Ltd	United Kingdom
Aabs Inc.	Japan
ABCiTY ApS	Denmark
Abstraction Games	Netherlands
Abylight S.L.	Spain
Activision Blizzard UK Ltd	United Kingdom
Adventure's Planet SRL	Italy
Aeria Games Europe GmbH	Germany
Aerosoft GmbH	Germany
Affinity Studios Ltd	United Kingdom
Agatsuma Entertainment Co.,Ltd	Japan
Agenius Interactive AS	Norway
Agetec Europe Ltd	United States
Aidem Media Sp. z o. o	Poland
AIM Productions	Belgium
Akaoni Studio S.L	Spain
Aksys Games	United States
Alawar Entertainment Inc.	United States
Alien8 Limited	United Kingdom
Amanita Design s.r.o.	Czech Republic
Anima Game Studio S.L.	Spain
Ankama Studio	France
Anozor SARL	France
Ant Games Ltd	United Kingdom
Anunam Interactive SA	France
Apollo Medien GmbH	Germany
Aqua Pacific Ltd	United Kingdom
Arberth Studios	United Kingdom
Arc System Works Co.,Ltd	Japan
ARRAKIS nv/Larian Studios	Belgium
Artematica Entertainment Srl	Italy

Publisher Company	Country
Artplant AS	Norway
Ascaron Entertainment GmbH	Germany
Aspyr Media Europe Ltd	United Kingdom
Assoria	France
Astragon Software GmbH	Germany
Asylum Entertainment	United Kingdom
Atari Europe	France
Atari United Kingdom Limited	United Kingdom
Ateam Inc.	Japan
Avanquest Ibérica	Spain
Avanquest Software Publishing Ltd	United Kingdom
Ayeware AB	Sweden
B2B Games	France
Backbone Entertainment	United States
Bakno LLC	United States
Barnstorm Games	United Kingdom
Barunson Creative Co, Ltd	South Korea
Bayer Healthcare, LLC	United States
BBC Worldwide (Digital Entertainment & Games)	United Kingdom
Beat Games	Germany
Beatshapers	Ukraine
BeiZ Oy	Finland
Bergsala Lightweight AB	Sweden
BEYONDTHEPILLARS SAS	France
BHV Software GmbH	Germany
Biart Studio LLC	Russia
Big Ant Studios	Australia
Big Blue Bubble Inc	Canada
Big Head Games Ltd.	United Kingdom
Big Sandwich Games Inc	Canada
BIGBEN INTERACTIVE	Australia
BiP Media	France
BITBOX S.L (Tragnarion)	Spain
bitComposer Games GmbH	Germany
Black Lab Game Tech Pty Ltd	Australia
Black Market Games Ltd	Ireland
Blast Entertainment Ltd	United Kingdom
Blaze Games Ltd.	United Kingdom
BlazingCow Limited	United Kingdom
Blitz Games Studios Ltd	United Kingdom
Blizzard Entertainment SAS	France

Publisher Company	Country
Blobber Team SA	Poland
BLStream Sp. Z o.o.	Poland
Blue Label Entertainment Srl	Italy
Blue Monkey Studios, Inc	United Kingdom
Bluestone Interactive Limited	United Kingdom
BOHEMIA INTERACTIVE a.s.	Czech Republic
Boiled Frog Gaming Limited	United Kingdom
Bongfish Interactive Entertainment	Austria
Boolat Limited Liability Company	Ukraine
Bplus	Austria
Braingame Development GmbH	Germany
BRAVO GAMES S.L.	Spain
BRIGHT THINGS PLC	United Kingdom
Brightstar Entertainment Ltd	United Kingdom
Broken Rules Interactive Media GmbH	Austria
Bubble Gum Interactive	Australia
BULKYPIX	France
Burda:ic GmbH	Germany
BWM Software und Vertriebs GmbH	Germany
Bytewire Ltd	United Kingdom
C2C Games	France
Capybara Games	Canada
Carre Multimedia	France
CAVE CO. , LTD.	Japan
CCP hf.	Iceland
CD Projekt	Poland
CD Projekt RED S.A.	Poland
CDV Software Entertainment AG	Germany
cdv Software Entertainment Ltd	United Kingdom
CE Europe Ltd.	United Kingdom
Cerasus Media GmbH	Germany
Chair Entertainment	United States
CherryPop Games Ltd	United Kingdom
Chillingo Ltd	United Kingdom
CINEMAX, s.r.o.	Czech Republic
Circle Entertainment Ltd	China
City Interactive SA	Poland
CJ Games Global	United States
Cliffhanger Productions Software GmbH	Austria
Cloanto Italia srl	Italy
Cobra Mobile	United Kingdom
Codemasters	United Kingdom
Cog Monkeys	Brazil
CogniKizz SAS	France
Cohort Studios Ltd	United Kingdom
Cold Beam Games Ltd	United Kingdom
Collecting Smiles, Inc.	United States
Complete-IT	Hungary

Publisher Company	Country
Confluence Composite de Concepteurs et Prestataires (C.C.C.P.)	France
Connect 2 Media	United Kingdom
Conspiracy Entertainment Europe Limited	United Kingdom
Corecell Technology Co, Ltd	Thailand
Coresoft Inc	United States
Cornelsen Verlag GmbH	Germany
Cowboy Rodeo Ltd	Finland
Creat Studios, Inc.	United States
Creative Patterns	France
Crimson Cow GmbH	Germany
CROCODILE ENTERTAINMENT S.L	Spain
Crystal Games	Netherlands
Curve Studios Ltd	United Kingdom
Cyberfront Corporation	Japan
CYBERFRONT KOREA CORPORATION	South Korea
CyberPlanet Interactive Co., Ltd.	Thailand
CyberSports Ltd	United Kingdom
CYBIRD Co., Ltd.	Japan
Cypronia	Slovakia
D2C Games, Inc.	United States
D3Publisher of America, Inc	United States
D3Publisher of Europe Ltd (D3P E Ltd)	United Kingdom
Daedalic Entertainment GmbH	Germany
Dakko Dakko	United Kingdom
Dancing Dots	France
Dare to be Digital	United Kingdom
Data Design Interactive Limited	United Kingdom
Davilex Games BV	Netherlands
DelRox BV	Netherlands
Denda Publishers B.V.	Netherlands
Destineer Publishing Corp.	United States
DHM Interactive	France
Dibbit Ltd	United Kingdom
Different Tuna	United Kingdom
Digital Chocolate Ltd	Finland
Digital Content, LLC dba Big John Games	United States
Digital Goldfish Limited	United Kingdom
Digital Leisure Inc.	Canada
Digital Reality Publishing Kft.	Hungary
Digital Tales S.r.l	Italy
DIGITAL TRIBE GAMES, LLC	United States
Discovery Concepts International Limited	United Kingdom
Disky Communications Europe B.V.	Netherlands
DK-GAMES	France
DMD Enterprise Sp. Z o.o.	Poland
Doctor Entertainment AB	Sweden
DON'T NOD Entertainment	France

Publisher Company	Country
Double Jungle S.a.S.	Italy
Double Six Digital Publishing Ltd	United Kingdom
DR Studios Limited	United Kingdom
DreamCatcher Europe	France
DrinkBox Studios Inc.	Canada
dtp entertainment AG	Germany
Dusk2Dawn Interactive Limited	United Kingdom
Dynamic Systems Group Ltd	United Kingdom
E-One Studio Sdn. Bhd.	Malaysia
E2 publishing s.r.l.	Italy
EA Swiss Sarl	Switzerland
eastasiasoft	Hong Kong
Easy Computing Publishing NV	Belgium
Easy Interactive	Netherlands
Easy Tiger Media Ltd	United Kingdom
Easysolving di Claudio Marchesan	Italy
Educamigos s.l.	Spain
Egg Ball	France
Eiconic Games Ltd	United Kingdom
Eidos Interactive	United Kingdom
Eko Software S.A.R.L.	France
ELEKTROGAMES	France
Elephant Entertainment	United Kingdom
Elonex	United Kingdom
Emme SA	France
Empire Interactive Europe Ltd.	United Kingdom
Empire of Sports AG	Switzerland
Empty Clip Studios	United States
Endforce Ltd	United Kingdom
Endgame Studios	Australia
Enemy Technology LLC	United States
Engine Software	Netherlands
ENIGMA Software Production,SL	Spain
Enjoy Gaming Ltd	United Kingdom
Enjoyup Games, S.L.	Spain
Enlight Software Limited	China
Eragion	Canada
EUN Partnership AISBL	Belgium
Eutechnyx Ltd	United Kingdom
eV Interactive LLC	United States
EVERSIM	France
Excalibur Publishing Limited	United Kingdom
Exkee	France
EXOR Studios	Poland
Experimental Gameplay Group, LLC (DBA: Tomorrow Corporation, LLC)	United States
Extra Toxic GmBh&Co.KG	Germany
Eyebrow Interactive, LLC	United States

Publisher Company	Country
F4 Group	France
F4-Toys	France
Fallen Tree Games Ltd	United Kingdom
Fantage.com, Inc.	United States
Farmind Ltd	Finland
FarSight Studios	United States
Fatshark AB	Sweden
FDG Entertainment&Co. KG	Germany
Feral Interactive Limited	United Kingdom
Fiaa GmbH	Germany
Filao	France
Filematch Ltd T/A Microvalue	United Kingdom
Firemint	Australia
Fishing Cactus SPRL	Belgium
FISHLABS Entertainment GmbH	Germany
Flashpoint AG	Germany
Flat Black Films	United States
Focus Home Interactive	France
Focus Home Interactive Benelux	Belgium
Focus Multimedia Limited	United Kingdom
France Télécom DC / GOA	France
Franzis Buch- & Softwareverlag GmbH	Germany
Freudenthal Institute	Netherlands
Frima	Canada
Frogwares Ireland	Ireland
FromSoftware, Inc.	Japan
Frontier Developments Limited	United Kingdom
FRONTLINE studios	Poland
Frozen Codebase LLC	United States
Frozenbyte, Inc.	Finland
Fugazo Inc.	United States
FullFat Productions Ltd	United Kingdom
Funbox Media Ltd	United Kingdom
Funcom GmbH	Switzerland
Funfia Inc.	Taiwan
Funtank LLC	United States
Fusion Labs Ltd	United Kingdom
Futuremark Oy	Finland
Futurlab Ltd	United Kingdom
FX Interactive	Spain
G-Style Co., Ltd	Japan
G.rev Ltd	Japan
G4BOX INC.	Canada
G5 Entertainment AB	Sweden
Gabitasoft BVBA	Belgium
GAELCO MOVILES, S.L.	Spain
Gaijin Entertainment Corporation	United States
Gaijin Games, Inc.	United States

Publisher Company	Country
Gala Networks Europe Ltd	Ireland
Gamania Digital Entertainment (Europe) B.V.	Netherlands
GAME ARTS Co., Ltd.	Japan
Game Capital B.V.	Netherlands
Game Factory Interactive	Cyprus
Game Outlet	Sweden
Game Republic, Inc	Japan
Gamebridge Ltd	United Kingdom
Gameforge 4D GmbH	Germany
Gameforge Berlin AG	Germany
Gamelion Studios Sp. z o.o.	Poland
Gameloft S.A.	France
GameOn GmbH	Germany
Games Factory Online BV	Netherlands
GAMESHAstra INC	United States
GamesRouter Ltd	United Kingdom
GAMEVIL USA, Inc.	United States
Gammick Entertainment SL	Spain
GCC-Games Campus Cologn GmbH	Germany
Gelid Games	Russia
GENIAWARE SRL	Italy
Genius Sonority Inc.	Japan
geobra Brandstätter GmbH & Co. KG	Germany
Gevo Entertainment Pte Ltd	Singapore
Ghostfire Games	United States
Ghostlight Ltd	United Kingdom
GIANTS Software	Switzerland
Giochi Preziosi HK Ltd	Hong Kong
Gizmondo Europe Limited	United Kingdom
Globz	France
GLU MOBILE	United Kingdom
GMX Media	United Kingdom
Golemlabs	Canada
GOST PUBLISHING	Belgium
Grab, LLC	United States
Granzella Inc.	Japan
Greenstreet Software Limited	United Kingdom
Grendel Games	Netherlands
Griffin International	United States
GRIP Digital s.r.o	Czech Republic
Groove Media Inc.	Canada
GSC Game World	Cyprus
Guidance Interactive Healthcare	United States
GungHo Online Entertainment America, Inc.	United States
h2f Informationssysteme GmbH	Germany
Halfbrick Studios	Australia

Publisher Company	Country
HAMSTER Corporation	Japan
Hanaho Games Inc.	United States
HandCircus Ltd	United Kingdom
Hands-On Mobile, Inc.	United States
Harmonix Music Systems, Inc	United States
HB Studios Multimedia Ltd.	Canada
HD Publishing BV	Netherlands
Headup Games GmbH & Co. KG	Germany
Heatwave Interactive	United States
Hell-tech e.K	Germany
Hellfire Games Inc.	United States
Helliwood media & education	Germany
Hello Games	United Kingdom
Hi-Rez Studios	United States
Hip Interactive EUROPE	France
HMH Hamburger Medien Haus Vertriebs GmbH	Germany
Home Entertainment Suppliers Pty Ltd	Australia
Honeyslug Ltd	United Kingdom
Hörberg Productions	Sweden
Hothead Games, Inc.	Canada
Hudson Entertainment	United States
HUDSON SOFT CO., LTD.	Japan
Hydestile Media & Creative Ltd	United Kingdom
Hydravision Entertainment	France
I-Friqiya FZ-LLC (known as I-Friqiya)	United Arab Emirates
Iceberg Interactive BV	Netherlands
IceBreaker US	United States
Icon Games Entertainment Ltd	United Kingdom
IDEA GAMES a.s.	Czech Republic
Ideas Pad Ltd	United Kingdom
Ignition Entertainment Ltd	United Kingdom
Image & Form International AB	Sweden
Immanitas Entertainment GmbH	Germany
Immersive Games Limited	United Kingdom
Impressionware srl	Italy
IncaGold plc	United Kingdom
Index Digital Media Inc	United States
Indie Games Productions	France
IndiePub Entertainment inc	United States
Infernum Productions AG	Germany
Infinite Dreams Inc.	Poland
Infinite Interactive Pty. Ltd.	Australia
Ingress Ventures BV	Netherlands
Innova Co. S.a.r.l.	Luxembourg
INTENIUM Console GmbH	Germany
Intenium GmbH	Germany

Publisher Company	Country
Intense Co., Ltd.	Japan
International Business Alliance USA Inc.	United States
INTERPLAY ENTERTAINMENT CORP	United States
Introversion Software Limited	United Kingdom
Invictus-Games Kft.	Hungary
InXile Entertainemnt	United States
IPACS	Germany
IQ Publishing	Poland
IREM SOFTWARE ENGINEERING INC.	Japan
ISFE	Belgium
ISOPOD LABS, LLC	United States
iSquared Games Ltd	United Kingdom
IVENT LTD	Bulgaria
JAKKS Pacific Inc.	United States
Játékszalón Kft.	Hungary
JBT Nordic License Scandinavia AB	Sweden
Jelly Bridge Productions Ltd	United Kingdom
Jester Interactive Publishing LTD	United Kingdom
Jet Set Games, Inc.	United States
Johanna Grahn Interactive	Sweden
Joindots GmbH	Germany
Joju Games (legal name: Gril Productions Inc)	United States
JoWood Entertainment	Austria
Juggernaut Games, LLC	United States
Just A Game GmbH	Germany
JV Games, Inc	United States
K.E. Mathiasen A/S	Denmark
K2 NETWORKS Inc.	United Kingdom
Kaasa solution GmbH	Germany
Kalicanthus Entertainment S.r.l.	Italy
Kalypso Media Digital Ltd	United Kingdom
Kalypso Media GmbH	Germany
KANDO GAMES	France
Karateka LLC	United States
Kazago Entertainment	France
Kemco Europe	Germany
Keystone Game Studio	Taiwan
KIDDINX Entertainment GmbH	Germany
Kiloo Aps	Denmark
KINGSTON UNIVERSITY	United Kingdom
KnapNok Games ApS	Denmark
KOCH media	United Kingdom
Koch Media GmbH (Austria)	Austria
Koch Media SLU	Spain
Kolkom International LLC	United States
Konami Digital Entertainment GmbH	Germany

Publisher Company	Country
Konami of Europe UK	United Kingdom
Korner Entertainment SL	Spain
Krea Medie A/S (Ltd.)	Denmark
Kritzelkratz 3000 GmbH	Germany
Krome Studios Pty Ltd	Australia
kunst-stoff GmbH	Germany
Lace Mamba Global Ltd	United Kingdom
Lapland Studio Ltd.	Finland
LASNERSOFT	Argentina
Laughing Jackal Ltd	United Kingdom
lbxgames GmbH	Germany
LEADER S.P.A.	Italy
Leader S.p.A.	Italy
Legacy Interactive	United States
Legendo Entertainment AB	Sweden
LEGO System A/S	Denmark
Lemon Games S.L.	Spain
LEON BROTHERS	France
Lesta Co Ltd	Russia
LEVEL-5 International America, Inc.	United States
LEXICON Entertainment	United Kingdom
Lexis Numérique	France
Licensed 4U Ltd	United Kingdom
licomp EMPiK Multimedia Ltd	Poland
Lifeline Entertainment, SL	Spain
Lighthouse Interactive Game Publishing BV	Netherlands
Limbic Entertainment GmbH	Germany
Limelight Software Limited	United Kingdom
Little Orbit Europe, LTD.	United Kingdom
LITTLE WORLD STUDIOS SL	Spain
Little Worlds Studio	France
Load Inc.	France
Lockpick Entertainment	Sweden
Lockwood Publishing Ltd	United Kingdom
Ludia Inc.	Canada
Luk Internacional SA	Spain
MAD Works B.V.	Netherlands
MadCatz Inc.	United States
MAGES. Inc.	Japan
MAGIX AG	Germany
Magnussoft Deutschland GmbH	Germany
Majesco Europe Limited	United Kingdom
Mamba Games Ltd	United Kingdom
Markus Trösztler 337studios	Austria
Mass Creation Sp. z o. o.	Poland
Mass Media Games, Inc.	United States
Mastertronic Group Limited	United Kingdom

Publisher Company	Country
Mastiff LLC	United States
Mattel UK Limited	United Kingdom
Maximum Games	United States
MC2	France
Media Sales & Licensing B.V.	Netherlands
Mediatonic Ltd.	United Kingdom
Mercury Games Limited	United Kingdom
Mere Mortals Limited	United Kingdom
Merge Games	United Kingdom
Meridian4 (6197230 Canada Inc.)	Canada
Meteor Entertainment Inc.	United States
Metro3D Europe Ltd	United Kingdom
Micro Application SA	France
Microforum Ltd.	Canada
MICRONET, S.A.	Spain
Microsoft Developers	Switzerland
Microsoft Ireland Research	Ireland
Microtime Interactive Limited	United Kingdom
Midas Interactive Entertainment Ltd	United Kingdom
Might and Delight AB	Sweden
Milestone srl	Italy
Mind Candy Ltd	United Kingdom
Mindscape S.A.	France
Mindscape Northern Europe BV	Netherlands
Minority Media Inc.	Canada
MMM MultiMedia/Manufaktur GmbH	Germany
Mobigame SARL	France
Mobisation	Germany
Momentum Bilgisayar Yazilim A.S.	Turkey
mondokiddo SAS	France
MonkeyPaw Games, Inc.	United States
Monte Cristo Multimedia	France
Moonpod Ltd.	United Kingdom
Morphicon Limited	Germany
MPS Multimedia Inc., DBA Selectsoft, Select	United States
MSL INTENIUM B.V	Netherlands
MTO USA, Inc	United States
MTV Networks, a division of Viacom International	United States
Nabi Studios Pte Ltd.	Singapore
Namco Bandai Games Europe	France
NAMCO BANDAI Games Inc.	Japan
NAMCO BANDAI Partners S.A.S	France
Nano Games sp. z o.o.	Poland
Natsume Inc.	United States
NCsoft Europe Ltd	United Kingdom
nDreams Ltd	United Kingdom

Publisher Company	Country
NDS Denmark A/S	Denmark
Neko Entertainment	France
NEMOPOLIS	France
NEULAND MULTIMEDIA GmbH	Germany
Neutron Games GmbH	Germany
Nevrax Sarl	France
NEXON Europe Limited	United Kingdom
NEXON Europe S.à r.l.	Luxembourg
Nicalis, Inc.	United States
Nicam	Netherlands
Nicolas Games SA	Poland
Nintendo of Europe GmbH	Germany
NIS America, Inc	United States
Nnooo	Australia
Nobilis	France
Nocturnal Entertainment Australia, Pty Ltd	Australia
Nokia Corporation	Finland
Nomad Games Limited	United Kingdom
Nordcurrent	Lithuania
Nordic Games GmbH	Austria
Nordic Games Publishing AB	Sweden
Nordic License Toys AB i Lidingö AB	Sweden
Nordisk Film Distribution A/S	Denmark
Novalogic Ltd.	United Kingdom
Novalogic, Inc USA	United States
Noviy Disk	Russia
Object Vision Software AG	Germany
Ocean Media, LLC	Croatia
Oddworld Inhabitants, Inc.	United States
odenis studio	France
Oetinger Media GmbH	Germany
OG International Ltd	United Kingdom
Omni Systems Ltd	United Kingdom
On Line Fussball Manager GmbH	Germany
ONIMEDIA SP. Z O.O.	Poland
Onteca Ltd	United Kingdom
Open Emotion Studios	Ireland
Openoko Entertainment Sp. z o.o.	Poland
OSAO	Denmark
Other Ocean Interactive	Canada
Outerlight Ltd	United Kingdom
Outso Ltd	United Kingdom
Over the Top Games, SL	Spain
ovos realtime3D gmbH	Austria
Oxygene Srl	Italy
OYUN STUDYOSU	Turkey
P.M. Studios S.r.l.	Italy
P1 Sports Ltd.	United Kingdom

Publisher Company	Country
P2 Games Limited	United Kingdom
PAN Vision Distribution AB	Sweden
Panini s.p.a.	Italy
Pantheon Publishing Ltd	United Kingdom
Paradox Interactive	Sweden
Paramount Digital Entertainment	United States
Particular	Spain
Pavel Tovarys	Czech Republic
Pelfast, Inc.	United States
Performance Designed Products LLC	United States
Phantagram Co., Ltd.	South Korea
Phenomedia Publishing GmbH	Germany
Phoenix Games (Holland) BV	Netherlands
Phoenix Global Software	United Kingdom
Pinnacle Entertainment Ltd	United Kingdom
PINPIN TEAM SARL	France
Pixel Federation	Slovakia
Pixel Tales	Sweden
Pixel Toys	United Kingdom
Pixelane Oy	Finland
Pixonauts KG	Germany
PLANET NEMO Productions	France
Play It Ltd	United Kingdom
Playdead	Denmark
Playerthree Limited	United Kingdom
Playful Entertainment Inc	Canada
Playlogic Games B.V.	Netherlands
Playstos S.r.l.	Italy
plazz entertainment AG	Germany
PM Studios	United States
Polygon Toys	Finland
PomPom Software Ltd	United Kingdom
PopCap Games, Inc	United States
Positive Gaming Europe AB	Sweden
Power Up S.r.l.	Italy
Powerhead Games	United States
PQUBE Ltd	United Kingdom
Prelusion Games AB	Sweden
Press Play	Denmark
Prodigy Designs Trading	New Zealand
Project Three Interactive BV	Netherlands
Promotion Software GmbH	Germany
ProSieben Sat. 1 Digital GmbH	Germany
ProSiebenSat.1 Games GmbH	Germany
Psyonix	United States
Pub Company Srl	Italy
Pyxel Arts Digital Entertainment S.L.	Spain
Q Entertainment Inc	Japan

Publisher Company	Country
Quality Games Online Ltd	United Kingdom
QubicGames sp z o.o.	Poland
Quirkat	Jordan
Radiation Burn Limited	United Kingdom
Ragtag Developments Ltd	United Kingdom
RailSimulator.com Ltd.	United Kingdom
Rainbow Media Pte Ltd	Singapore
RAINBOW S.P.A.	Italy
Ratloop Asia PTE Ltd	Singapore
Ravensburger Digital GmbH	Germany
Razor Sharp Studios Limited	United Kingdom
Recoil Games Oy	Finland
Red Hare Studios	Singapore
Red Mile Entertainment	United States
Redback Sales Limited	United Kingdom
Redlynx Ltd	Finland
RedOctane	United States
redspotgames	Germany
Reef Entertainment Limited	United Kingdom
Reflexive Entertainment, Inc	United States
Relentless Software	United Kingdom
Remedy Entertainment Ltd.	Finland
Renegade Kid LLC	United States
responDESIGN	United States
Reto-Moto ApS	Denmark
Retro Affect	United States
Reverb Publishing	United States
Right Square Bracket, Left Square Bracket Inc	Canada
Ringzero Game Studio Co., Ltd.	Thailand
Ripstone Ltd	United Kingdom
Rising Star Games Ltd	United Kingdom
Riverdeep Interactive Learning Limited	Ireland
Robot Entertainment	United States
Rock Hippo Productions Ltd	Canada
rokapublish UG	Germany
Randomedia Marketing & Vertriebs GmbH	Germany
Ronimo Games	Netherlands
ROURKE LTD.	United Kingdom
Rovio Mobile Ltd	Finland
RTL Games GmbH	Germany
Rubicon Mobile, Ltd	United Kingdom
S.A.D Software Produktions- und Vertriebs GmbH	Germany
SABARASA INC	United States
Saffran Prod	Germany
Sammy Europe Ltd.	United Kingdom
Sanuk Games SARL	France

Publisher Company	Country
Sanuk Software Co., Ltd.	Thailand
Saturnine Games	United States
SC2X/Mad Monkey Studio	France
Schulenburg Software Development UG	Germany
Seed Studios Lda	Portugal
SEGA Europe Ltd	United Kingdom
Semaphore	Saudi Arabia
SG Interactive, INC.	United States
Shanblue Interactive S.L.	Spain
Sheffield Hallam University Enterprises Limited (SHUEL)	United Kingdom
Shin'en Multimedia GmbH	Germany
Shindo S.A.S.	France
Silicon Carne	France
SimBin Studios AB	Sweden
SINGAPORE-MIT GAMBIT Game Lab	Singapore
Sixense Entertainment Inc.	United States
SKYL-COM LTD	Hungary
Slam Games Ltd.	United Kingdom
Slitherine Software UK Ltd	United Kingdom
Smack Down Productions	France
SME Dynamic Systems Ltd	Ukraine
SnapDragon Games GmbH	Germany
Sniper Entertainment	France
SNK PLAYMORE CORPORATION	Japan
Soepel B.V.	Netherlands
Solus Games	United States
Sonic Powered Co, Ltd	Japan
SONY BMG MUSIC ENTERTAINMENT GmbH	Germany
Sony Computer Entertainment Europe	United Kingdom
Sony Online Entertainment	United States
SouthPeak Interactive	United Kingdom
Spin Master Studios	United States
Square Enix Ltd	United Kingdom
STAEDTLER Mars GmbH & Co. KG	Germany
Steel Penny Games, Inc.	United States
Stickmen Limited	New Zealand
STIMTECH LIMITED	Cyprus
Stonehill Online Software Design	Germany
StormBASIC S.L.	Spain
Studio 100 NV	Belgium
Subatomic Studios	United States
Submarine	Netherlands
Sunflex Europe GmbH	Germany
SYSTEM 3 LTD	United Kingdom
TAB Austria Industrie- und Unterhaltungselektronik GmbH & CoKG	Austria











Publisher Company	Country
Tag Games Limited	United Kingdom
Tailteann Games Ltd.	Ireland
Taito Corporation	Japan
Take2 Interactive Software Europe Ltd	United Kingdom
Tama Global, S.L.	Spain
Tantalus Media Pty Ltd	Australia
Tanukii Studios Ltd	United Kingdom
Targem Games	Russia
TASUKE Co., Ltd.	Japan
TATE MULTIMEDIA S.A	Poland
TDK Recording Media Europe S.A.	Luxembourg
Team17 Digital Limited	United Kingdom
Team6 Game Studios BV	Netherlands
Teamworks Productions Limited	United Kingdom
Techland SP. Z.O.O.	Poland
Techtonic Games Inc.	United States
Tecmo Inc	United States
Tecmo Koei Europe Ltd	United Kingdom
Tecmo, Ltd.	Japan
TELEagri Media GmbH	Germany
Telltale Games	United States
Tension Graphics AB/PlaygroundSquad	Sweden
TESSLOFF VERLAG	Germany
TETRIS ONLINE Inc	United States
Teyon	Poland
TGC – The Games Company Worldwide GmbH	Germany
The Code Monkeys Ltd	United Kingdom
The Fighter Collection	United Kingdom
The Game Atelier	France
The Game Creators Ltd	United Kingdom
The Toy:Lobster Company Ltd	United Kingdom
The Walt Disney Company Ltd	United Kingdom
thePharmacy Media BV	Netherlands
THQ Inc	United States
THQ Wireless	Luxembourg
Tiger Games Limited	United Kingdom
TikGames, LLC	United States
Tiki Games, Inc.	United States
TimeGate Studios, Inc.	United States
Tivola Publishing GmbH	Germany
Tomislav Simundic Marketing Consulting	Germany
Tomy UK Ltd.	United Kingdom
TopWare Interactive AG.	Germany
Tower Studios Ltd	United Kingdom
Tozai Inc.	United States
Tradewest	France

Publisher Company	Country
Tradewest Games Ltd	United Kingdom
TRANSPOSIA NV	Belgium
Trendy Entertainment	United States
Treva Entertainment Gmbh	Germany
Triangle Studios	Netherlands
Trion Worlds Inc	United States
Tripwire Interactive LLC	United Kingdom
Tubby Games Ltd.	United Kingdom
Tumbleweed Interactive DA	Norway
TV4 AB	Sweden
Twisted Dragon Media LLC	United States
Two Tribes Publishing B.V.	Netherlands
Ubi Soft Entertainment - UK	United Kingdom
Ubisoft B.V.	Netherlands
Ubisoft EMEA	France
Ubisoft France	France
UFO Interactive Games INC	United States
United Independent Entertainment GmbH	Germany
United Publishing Interactive Ltd.	Germany
United Soft Media Verlag GmbH (USM)	Germany
Upfront Promotions	United Kingdom
Upjers GmbH&Co. KG	Germany
Urbanscan Limited	United Kingdom
Valcon Games LLC	United States
Valve Corporation	United States
Vanilla Live Games Softwareentwicklungs GmbH	
Vblank Entertainment Inc	Canada
VEEMEE LLP	United Kingdom
Vertigo Games	Netherlands
Villa Hirschberg Online GmbH	Germany
Virgin PLAY, S.A.	Spain
Virtual Air Guitar Company Oy	Finland
Virtual Play Games	United States
Virtual Toys S.L.	Spain
Vitrex Multimedia Grosshandel GmbH	Germany
Vivaio-Games SARL	France
Vivendi Games Ireland Ltd	Ireland
Vogster Entertainment	United States
VS Digital GmbH	Germany
VSC	United Kingdom
W!Games	Netherlands
Wacom Europe GmbH	Germany
WalkOn media publishing GmbH & Co.KG	Germany
Walt Disney Home Entertainment	United Kingdom
Walt Disney Internet Group	United Kingdom
WarChest Ltd.	United Kingdom

Publisher Company	Country
Wargaming.net LLP	United Kingdom
Warner Brothers Entertainment UK Ltd	United Kingdom
watAgame ApS	Denmark
WayForward Technologies, Inc.	United States
WAYWARDXS Entertainment SRL	Italy
Webzen Inc.	South Korea
Wendros AB	Sweden
WHA Entertainment Inc	United States
Whiptail Interactive (Europe) S.L.	United Kingdom
White Park Bay Software Ltd.	United Kingdom
White Room Games Limited	United Kingdom
WHIZZ-BIZ LIMITED	United Kingdom
Wired Productions Ltd	United Kingdom
Wizarbox	France
Wizards of the Coast LLC	United States
X1 Software	Germany
Xendex Holding GmbH	Austria
Xform	Netherlands
XGen Studios Inc	Canada
Xicat Interactive	United Kingdom
XIM Inc	United Kingdom
XPEC Entertainment Inc.	Taiwan
XSEED Games	United States
YECK Entertainment	Taiwan
Yostar Entertainment Group	United States
YooStar Ltd.	United Kingdom
YoYo Games Ltd.	United Kingdom
YUKE'S CO., LTD.	Japan
YUKE'S Company of America	United States
YULLABY SARL	France
ZALLAG S.A.S	France
Zefxis A. & D. Bendilas	Greece
ZEN Studios Ltd	Hungary
Zen United Ltd	United Kingdom
ZeniMax Europe Limited/Bethesda Softworks Europe	United Kingdom
ZeptoLab UK Limited	United Kingdom
Zeroscale Games GmbH	Germany
Zinkia Entertainment	Spain
Zoo Entertainment Europe Limited	United Kingdom
Zordix AB	Sweden
Zuing Studio S.L.	Spain
Zushi Games	United Kingdom









ANNEX 3 - PEGI Assessment Form

Rating	No.	Question	Help	Content descriptor
		Does the game contain:		
	1	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 
	2	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 
	3	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 
	4	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 



Rating	No.	Question	Help	Content descriptor
	5	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 
	6	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 
	7	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 
	8	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 
	9	Sexual expletives or blasphemy (only answer 'yes' to this question if a 'yes' answer has been given to any of questions 1-8)	A 'yes' answer to this question 9 will ensure that a language descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 1 – 8 do not answer 'yes' to this question 9. 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 www.pegi.info	10	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 1-8)	A 'yes' answer to this question 10 will ensure that a gambling descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 1 – 8 do not answer 'yes' to this question 10. 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 www.pegi.info	11	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 or hunting or predation displayed between animal-like characters acting in their natural environment and behaviour.	Violence 
 16 www.pegi.info	12	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 www.pegi.info	13	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 24 is probably more appropriate.	Violence 
 16 www.pegi.info	14	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 

Rating	No.	Question	Help	Content descriptor
 www.pegi.info	15	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 
 www.pegi.info	16	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 
 www.pegi.info	17	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 
 www.pegi.info	18	Depictions of the use of illegal drugs	This includes the use of illegal drugs in any circumstances.	Drugs 
 www.pegi.info	19	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 
 www.pegi.info	20	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 11-19)	A 'yes' answer to this question 20 will ensure that a gambling descriptor is used on packaging. If a 'yes' answer has not been given to any of questions 11 – 19, do not answer 'yes' to this question 20. 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
 12 www.pegi.info	21	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 www.pegi.info	22	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). This does not include hunting or predation displayed between animal-like characters acting in their natural environment and behaviour. If the violence is unrealistic and of a minor nature, or set in a child-like setting, then questions 30 or 32 may be more appropriate.	Violence 
 12 www.pegi.info	23	Depictions of realistic looking violence of a minor nature on a human-like or animal-like character that does not result in any obvious injury or harm	This is where the violence to the human-like or animal-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 www.pegi.info	24	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 

Rating	No.	Question	Help	Content descriptor
 12 www.pegi.info	25	Words or activities that amount to obvious sexual innuendo or explicit sexual descriptions or images or sexual posturing	<p>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.</p> <p>If however, the couple can be seen, even if they are partially clothed, then question 14 'sexual intercourse without visible genitals' will be more appropriate. The test is whether the images could prompt sexual curiosity on behalf of the player.</p> <p>Sexual posturing means dancing or posing (while remaining clothed) in a manner intended to put across a sexual message or suggestion. This will include such things as pole dancing, lap dancing and even some of the more suggestive music video sequences.</p>	Sex 
 12 www.pegi.info	26	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 www.pegi.info	27	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 
 7 www.pegi.info	28	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 

Rating	No.	Question	Help	Content descriptor
	29	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 
	30	Depictions of non-realistic violence of a minor nature towards a human-like or animal-like character	Characters must react to the violence in an unrealistic way, e.g. they flash or disappear when hit, but do not show any apparent reactions consistent with real life. The important aspect will be the minor nature of the violence. Therefore there cannot be any of the following: <ul style="list-style-type: none"> • Emphasis on the violence in depictions or audio, e.g. close-ups, slow motion • Depictions of pain or suffering 	Violence 
	31	Depictions of implied violence to humans where the actual violence 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. It also includes depictions of violence against humans where you do not see any violent act, or the immediate reaction to this act, but you do see the cause and/or the result.	Violence 
	32	Depictions of violence that is humorous and/or is set in a cartoon, slapstick or child-like setting, and is likely to be disturbing to younger children.	A child-like setting is a setting that is more likely to appeal to younger children. Such a setting may include (but is not limited to): <ul style="list-style-type: none"> • a fantastical theme • bright colors • playful music • cheerful sounds and/or an overall cartoonlike atmosphere Whether the violence in that setting is likely to be disturbing to younger children is determined by elements such as: <ul style="list-style-type: none"> • fierce sounds • nature of the characters • the severity of the violence and/or dark overtones 	Violence 
	33	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 

Rating	No.	Question	Help	Content descriptor
	34	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.	—
	35	Depictions of violence that is humorous and is set in a cartoon, slapstick or child-like setting.	The humorous element is essential for violence to be depicted at this level, however, it is immaterial whether the characters are realistic (Laurel and Hardy style), non-realistic (fantasy characters or characters drawn as you would expect in comic books) or cartoon characters (Bugs Bunny or Tom and Jerry style). It refers to the actual violence and not merely to the overall theme of the game. Therefore an act of violence, which in itself is not humorous, contained in a comedy would be more appropriate at the 12+ level. Nothing should be shown that might in any way disturb younger children. No blood or obvious injuries should be visible.	—
	36	Does the game allow online game play with or against other people?	This applies to games where it is necessary to connect to any website, portal, gateway or other internet connection in order to play the game. It includes those games played as 'single player' as well as those played as 'multi-player'. It does not include games that are only downloaded via the internet and subsequently played on the PC or console without the requirement for an internet connection for the actual game play.	Online Descriptor 

ANNEX 4 - Complaints

Date	Game	Initial rating	New rating	Publisher	Complainant	Ad hoc Complainants Board
28-Jan-09	SCRABBLE 2009	16	12	Ubisoft	Ubisoft	Rosemary Walker Spyros Pappas Jean Pierre Quignaux (Chair)
27-Aug-09	Barbie & 3 Musketeers	12	7	Activision	Activision	Rosemary Walker Lars Gjerlufsen Spyros Pappas (Chair)
18-Sep-09	Suske & Wiske	12	7	Foreign Media Games	Foreign Media Games	Laurent Baup Ger Connolly Jeffrey Goldstein (Chair)
8-Jun-10	Metroid	16	16	Nintendo	Nintendo	Lars Gjerlufsen (Chair) Spyros Pappas Jeroen Jansz
23-Oct-11	Diablo III	18	16	Blizzard Entertainment SAS	Blizzard Entertainment SAS	Lars Gjerlufsen (Chair) Jeroen Jansz Ger Connolly
16-Dec-11	Inazuma Eleven 2	12	12	Nintendo	Nintendo	Lars Gjerlufsen (Chair) Hanna Happo Spyros Pappas
2-Jul-12	NHL 13	16	12	Electronic Arts	Electronic Arts	Lars Gjerlufsen (Chair) Jeroen Jansz Olivier Gerard
3-Dec-12	Alan Wake American Nightmare	18	18	Microsoft Studios	Consumer complaint from Finland	Lars Gjerlufsen (Chair) Rosemary Walker Olivier Gerard
21-Jan-13	Battlefield Heroes	16	16	Electronic Arts	Consumer complaint from Ireland	Lars Gjerlufsen (Chair) Jeffrey Goldstein Ger Connolly

Complaint	PCB Conclusion
This rating is not the rating we expect for a family game like Scrabble	Considering that Scrabble 2009 contains swear words in a not strictly interactive manner and may use them without an intent to use them on the base of their meaning, our AHCB recommends, on grounds of proportionality to rate this game in regard of question 26 (12).
The video game is based on toy fantasy, depictions of combat are fantastical and do not show any blood, suffering or death.	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". Clearly the characters in this game do not react at all and in any event they do not react as if they were human-like.
	The Complaints Board cited the characters' reactions to violence, for example, disappearing in a puff of smoke, as justification for considering the violence to occur within a humorous context
VSC's rating is based on a very short, non-interactive cutscene involving a character who is shot with a freeze laser.	When looking at the scene "Freeze gun soldier" we find, the human-looking soldier is shot and falls in a realistic way. This means the scene is described in Q26, the length is of no importance.
The violence depicted in Diablo III matches the description given under question 11 of the PEGI Questionnaire (equating to a rating of 16) more closely than that under question 1 (equating to a rating of 18)	Sadism and torture as intended by Q1 are not present. It is arguable that it could be considered as having dismemberment or horrific depictions of death or injury. However such violence is taking place in a fantastical context, and almost certainly not of the intensity that we think the violence becomes gross.
The first Inazuma Eleven game has very similar graphics and gameplay but was only rated 7. The game has a child-oriented, fictional storyline about aliens playing football. The tone is light and fun, and there is a strong atmosphere of heroism and teamwork through sport.	The atmosphere in some scenes is more threatening and provoking anxiety than it is "bright, cheerful and funny". The violence is not humorous, the sounds are expressing fear and pain, and you can see injuries in cut scenes and collapsing buildings. Therefore it is not child-friendly for the youngest children. We agree it is important to have consistency in the rating, but the stretch between 7 and 12 means it is difficult to compare games. We do not see a problem with the current age rating of this game. Question 32 will not come in consideration.
NHL 13 to get a PEGI 12 rating, based on Q24 and Q36, because the violence in the game is depicted within the game.	Q11 seems applicable here: "depictions of realistic-looking violence towards human-like or animal-like characters". However, Q11 also says: "This does not include sporting action where it is depicted within the rules of the game". We find the ice-hockey fights are within the rules of the ice hockey game: there are specific penalties for such cases. These kinds of fights are covered by the official rules of ice hockey, fights are not considered to be a criminal action. Our conclusion is that Q24 applies: "depictions of arcade style or sporting action showing violence".
The rating 18 based on question 18, changed to rating 16 based on question 26	The game is a psychological game, and the cruelty of the bad guy seems to be central to the story. He exerts psychological pressure on the hero and seems very satisfied about his actions. In this context we find that the scenes are covered by the last part of Q3: "No character will be considered vulnerable or defenceless if they are not intended to be part of the gameplay. However, any violence in this context should be considered on its merits.
The complainant argues the rating for the online game Battlefield Heroes should be lowered to 12+.	After playing the game we find the action level and game content is best described in questions 11 and 12 (PEGI 16): "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" and "sustained depictions of death or injury to humanlike or animal-like characters. This means that all or the majority of the gameplay relates to violence." (Q 27). Although the game is somewhat cartoonish, the intense gameplay with the main subject to kill soldiers can be quite strong for a 12-13 year old.

For more information about PEGI and PEGI Online, please contact



PEGI S.A.

15 rue Guimard
B-1040 Brussels
phone: +32 (0)2 612 17 79
<http://www.pegi.info>
e-mail: info@pegi.info



Nederlands Instituut voor de Classificatie van Audiovisuele Media

Mediapark Mediacentrum
Sumatralaan 45
NL-1217 GP Hilversum
phone: +31 (0)85 401 16 77
e-mail: info@nicam.cc

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