



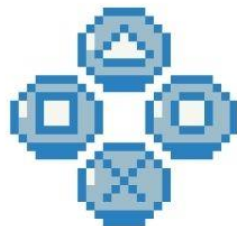
International Consumer Protection
and Enforcement Network

ICPEN Mobile and Online Games Sweep

30 June 2025



A report issued by
22 participating sweep member agencies



Gaming is a rapidly growing industry, with an estimated 3.3 billion people of the global population playing games in 2024¹. It has reached consumers across all age groups and geographical regions. With the development of an intricate ecosystem of game-related events and popular personalities such as Esports, merchandise and influencers, consumers' engagement with games and their communities now extends well beyond the confines of the video game itself.

In 2025, 22 ICPEN member agencies from across the globe participated in a sweep on mobile and online games. Together these agencies examined 439 games for practices related to loot boxes, virtual currencies, manipulative design techniques, pay-to-win models, conduct targeting minors and influencer marketing.

Although the qualification of what constitutes a misleading practice varies across legal jurisdictions, the participating sweep members are committed to making sure that consumers are protected from unfair and deceptive acts in gaming.

This report, issued by the participating sweep members, delves deeper into different practices most frequently encountered during the sweep.

Manipulative design techniques

Manipulative design techniques in mobile and online games refer to unfair design practices some developers use within games to deceive, steer, or manipulate users into behavior that is beneficial to the developer, but often harmful to players or contrary to their intent.

Of the games swept, **24% used urgency style design techniques** aimed at pressuring players to make a purchase of something scarce, and **38% used the same tactics** to encourage players to purchase items only available for a

limited time. In some cases, the timers were found to be false.

The other form of manipulative design techniques most prominently observed in the games swept was the use of nagging design techniques. For example, **60% of games sent notifications to players to log back into the game to claim some form of reward**, and **32% of games swept pressured players to purchase an item such as a life, energy or a booster, after losing**.



Mock Image of an in-game pop-up after losing a level

Disclosures

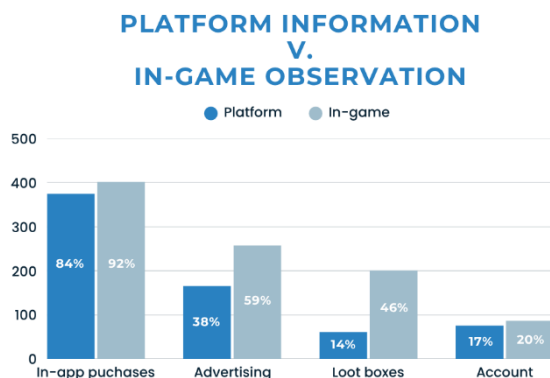
Making well-informed decisions as a consumer starts with being provided transparent and correct information. Transparency about in-game elements lets people better understand what they are buying or downloading. Conversely, displaying incomplete or incorrect information on the platform may lead to consumers taking decisions which they otherwise would not have.

Out of the games swept, 84% disclosed on their respective platform pages that the game included in-app purchases. This is relatively in line with what was observed in-game.

Information on **loot boxes**, to the contrary, was displayed in 14% of the games' platform pages, while they were observed in 46% of the games

¹ Gill, Sunil. 2025. "How Many Gamers Are There in 2025? Latest Stats." Priori Data. January 27, 2025. <https://prioridata.com/number-of-gamers/>.

swept. Meaning that **only 30% of the games with loot boxes disclosed the presence of this monetization mechanism.**



Virtual currencies

Virtual currencies are digital forms of in-game money players can use to purchase items within the in-game economy such as loot boxes, lives or weapons.

Of the games swept, 78% had some form of virtual currency built into the game. Of these games, **36% appeared to sell currency bundles that did not align with those of in-game items that were the most commonly sold.** This is likely to result in players being left with leftover virtual currency that is unusable within the game, unless they make more in-game purchases.

The sweep also revealed that of the games that used virtual currencies, **only 2% provided players with an option to ‘cash out’ or convert the virtual currency back into real world currency. Only 7% provided players with the ability to track their virtual currency spending history.**

Loot boxes

Loot boxes are virtual games of chance which offer players randomised rewards when opened, such as weapons, cosmetic items, or other in-game advantages. Players can obtain loot boxes by purchasing them with real or virtual currency, watching in-game advertisements, or spending time in the game.

Of the games found to include loot boxes, **62% of these games were advertised as suitable for children.** However, as previously noted, in most cases the **fact that games contained loot boxes was rarely disclosed** on the platforms where those game could be downloaded. In addition, of those games that included loot boxes, **55% did not display the probabilities of winning items from loot boxes.**

Protection of Minors

Even though the majority of the games swept displayed an age-rating, this rating seemed unaffected by the presence of loot boxes, in-game purchases and in-game advertisements. The presence of these items/practices was as common in games that were classified as appropriate starting at the age of 3, as they were in those for ages 12 and up. As such, it seems that the age rating alone may not be an adequate way to protect minors from these practices or inform their parents about their presence in the game.

In addition, parental controls and other practices aimed at protecting minors were only found in a small subsection of the games included in the sweep. Of the games that did include parental controls they were observed to be easy to setup and reinforce in 44% of the cases.

Conclusion

The sweep uncovered the presence of several practices that could potentially harm consumers. Given the prevalence of these practices in video games and the worldwide reach of this entertainment industry, the participating members of the sweep recommend more action from the industry, regulatory bodies and legislators.