

Responsible Gaming Policy
Version 2.0 | 2025

1. Introduction

La Libanaise des Jeux (LLDJ), operating under the supervision of the Ministry of Finance, is committed to ensuring that the national lottery is conducted with integrity, transparency, and a deep sense of social responsibility. As the operator of Lebanon's official lottery products, LLDJ acknowledges that the success and sustainability of its activities are intrinsically linked to the protection and well-being of players and the broader community. This Responsible Gaming Policy articulates LLDJ's principles and commitments in alignment with national regulations and the World Lottery Association (WLA) Responsible Gaming Framework 2025.

LLDJ recognizes that lottery games should remain an enjoyable form of entertainment and that safeguarding vulnerable individuals and preventing harm are central to maintaining public trust. This policy establishes a company-wide framework that guides decisions, supports operational procedures, and ensures a consistent, responsible approach to gaming across all channels.

2. Purpose of the Policy

The purpose of this policy is to formally outline LLDJ's approach to responsible gaming (RG) and to define the principles that underpin all aspects of our operations. It provides clear direction on how LLDJ prevents underage play, promotes informed gaming behaviors, ensures responsible product development, maintains transparent communication, and supports players who may need assistance. The policy also establishes the foundation for LLDJ's employee training, retailer expectations, internal governance, and continuous improvement practices.

This document is complemented by several internal procedures and supporting materials that operationalize our responsible gaming principles in day-to-day activities. Together, they ensure that LLDJ's responsible gaming program is coherent, practical, and aligned with international best practices applicable to national lottery operators.

3. Commitment to Responsible Gaming

LLDJ is committed to fostering a responsible gaming environment and mitigating potential risks associated with lottery play. While LLDJ's products are characterized by low entry prices, delayed draws, and low addiction potential compared to continuous or high-frequency gaming formats, the company acknowledges its duty to monitor and address potential risks and player vulnerabilities.

Responsible gaming at LLDJ is built on the principles of player protection, informed decision-making, ethical operations, and stakeholder collaboration. These principles are embedded into every key function of the organization—from game design and marketing to online operations, retail network management, and customer support.

LLDJ's leadership strongly supports a culture of responsibility, and senior management oversees the implementation of this policy to ensure that it remains aligned with global standards and responsive to developments in the gaming and regulatory landscape.

4. Regulatory Compliance and International Alignment

LLDJ complies with all Lebanese regulatory requirements governing lottery operations, consumer protection, communications, and digital engagement. The company maintains open dialogue with the Ministry of Finance and other relevant stakeholders to ensure that regulatory expectations are understood, implemented, and regularly reviewed.

In addition to meeting national obligations, LLDJ aligns its practices with international standards, particularly the WLA Responsible Gaming Framework 2025. The company assesses international benchmarks and emerging global trends to ensure that its responsible gaming approach remains current, proportionate, and consistent with the practices of leading European and global lotteries.

5. Protection of Minors

Preventing underage gambling is a fundamental and non-negotiable element of LLDJ's responsible gaming commitment. The sale of lottery products to anyone under the age of 18 is strictly prohibited. LLDJ enforces this principle through:

- **Age verification requirements** across all retail points of sale.
- **Mandatory identity verification** for all new online player registrations.
- **Clear "18+" signage** on physical materials, digital platforms, and promotional communications.
- **Retailer obligations** to refuse sales to minors and ensure that underage individuals do not engage with lottery products.

LLDJ conducts periodic reviews and communication campaigns to reinforce this requirement and, where appropriate, takes corrective action to address non-compliance within the retail network.

6. Responsible Product Design and Operation

LLDJ is committed to offering games that are structured and delivered in a responsible manner. All games operated by LLDJ undergo internal review prior to launch to ensure they meet responsible gaming criteria, including:

- Clear rules and transparent prize structures.
- Low, fixed entry prices to discourage excessive play.
- Delayed draw mechanisms that inherently reduce the risk of repeated play or impulsive behavior.

- Absence of design elements that may appeal to minors or vulnerable groups.

LLDJ also reviews its games periodically to identify any indicators of excessive or problematic play and adjusts guidance, communication, or monitoring activities as necessary. The company collaborates with technology partners and draws on international research to ensure its product portfolio continues to meet recognized responsible gaming standards.

7. Employee Awareness and Responsibilities

Employees play an essential role in supporting LLDJ's responsible gaming objectives. All employees whose roles relate to sales, customer service, retail management, digital operations, marketing, compliance, or regulatory interaction are expected to understand and uphold responsible gaming principles.

LLDJ provides regular training to ensure that employees:

- Understand the fundamentals of responsible gaming;
- Recognize early signs of potentially harmful behavior;
- Apply internal procedures for handling at-risk situations;
- Communicate responsibly and in accordance with company standards;
- Ensure minors and vulnerable groups are protected.

The company promotes a culture of responsibility and encourages reporting of concerns that may indicate a breach of this policy or any associated procedures.

8. Retailer Responsibilities

As the primary point of interaction with players, retailers are vital partners in implementing LLDJ's responsible gaming commitments. Retailers are required to adhere to the Retailer Responsible Gaming Code of Conduct and must:

- Verify the age of all players appearing under 25;
- Refuse sales to minors without exception;
- Display responsible gaming and 18+ signage provided by LLDJ;
- Promote responsible play and avoid encouraging excessive purchases;
- Report any unusual or concerning player behavior to LLDJ.

LLDJ supports retailers by providing training, information materials, and ongoing communication to ensure that responsible gaming expectations are clearly understood and consistently applied across Lebanon.

9. Responsible Advertising and Communications

LLDJ ensures that its advertising and marketing practices are socially responsible and comply with Lebanese regulations and international standards. All communications must:

- Avoid targeting minors or vulnerable groups;
- Present gaming as a form of entertainment, not a financial solution;
- Clearly state the minimum legal age for participation;
- Avoid exaggerating the possibility of winning or suggesting guaranteed outcomes;
- Maintain honesty, balance, and transparency.

LLDJ periodically reviews its advertising content and communication channels to ensure ongoing compliance and alignment with evolving responsible gaming expectations.

10. Support and Referral to Assistance Services

While harmful gambling behaviors are rare within the context of LLDJ's low-risk product portfolio, LLDJ recognizes that individuals may still require support. The company is committed to ensuring that players who seek assistance have access to accurate information and relevant support services.

LLDJ maintains a light-touch referral mechanism based on local NGOs, mental health centers, and addiction support organizations. Information about these services is made available through LLDJ's website and player education materials. LLDJ may also engage in awareness activities and maintain contact with relevant support organizations as part of its broader social responsibility commitments.

11. Monitoring, Review, and Continuous Improvement

LLDJ monitors player behavior across retail and online channels to identify unusual, high-volume, or irregular play patterns that may indicate potential risk. Structured internal procedures define the review, documentation, and intervention steps to be followed when necessary.

LLDJ evaluates its responsible gaming practices on a regular basis, taking into account:

- Feedback from players, retailers, and employees;
- Observations from regulators and stakeholders;
- Benchmarking against international lottery practices;
- Internal data and operational metrics.

This process ensures continual improvement and supports LLDJ's long-term commitment to responsible gaming.

12. Governance

The implementation of this policy falls under the authority of LLDJ's Executive Management. Operational responsibility is shared among the Compliance, Operations, Marketing, Digital, and Retail Management units, each of which is required to apply responsible gaming principles within its respective activities.

LLDJ reviews this policy annually or at any earlier time if required by changes in regulations, international standards, or internal priorities.