

Underage Gambling Prevention Policy
Version 2.0 | 2025

1. Introduction

La Libanaise des Jeux (LLDJ), under the supervision of the Ministry of Finance, is committed to safeguarding minors by preventing their exposure to, and participation in, lottery games. As the national lottery operator, LLDJ recognizes the critical role it plays in protecting young individuals and maintaining the integrity and reputation of the gaming sector in Lebanon. This policy defines LLDJ's principles, commitments, and expectations regarding the prevention of underage gambling, and outlines the measures implemented across retail, digital, and communication channels. It forms an essential part of LLDJ's broader Responsible Gaming Framework and reflects the company's alignment with the World Lottery Association (WLA) Responsible Gaming Framework 2025.

2. Purpose and Scope

The purpose of this policy is to establish a clear and consistent approach to preventing individuals under the age of 18 from accessing, purchasing, or participating in any LLDJ lottery product. The policy applies to all employees, retailers, agents, partners, marketing agencies, and digital operators involved in the sale, promotion, or distribution of LLDJ products. It also governs all LLDJ communication channels, including retail points of sale, the official website, mobile applications, social media platforms, and advertising outlets.

3. Commitment to Protecting Minors

LLDJ considers the protection of minors a fundamental ethical responsibility and a legal requirement. Preventing underage gambling is a cornerstone of the company's social responsibility strategy and is treated as a priority across all operational functions.

LLDJ adopts a zero-tolerance approach: under no circumstances may a minor be sold a lottery ticket, participate in a draw, access digital play functions, or be exposed to marketing content designed for adults. This strong position reflects both national regulations and international best practices adopted by leading lottery operators.

To support this commitment, LLDJ regularly reviews its policies, procedures, and controls to ensure their continued relevance and effectiveness.

4. Legal Framework and Regulatory Alignment

Lebanese regulations prohibit gambling activities by persons under the age of 18. LLDJ complies fully with this legal requirement and ensures that its operational standards meet or exceed national expectations.

In addition to national law, LLDJ aligns its practices with guidance from the WLA and benchmarks its controls against international lotteries with mature responsible gaming

environments. This dual alignment ensures LLDJ's approach remains robust, proportionate, and consistent with modern industry expectations.

5. Prevention of Underage Access in Retail Environments

Retailers represent a primary touchpoint for player interaction and therefore play a critical role in preventing underage gambling. LLDJ requires retailers to enforce strict age-verification standards and to uphold responsible gaming expectations at all times.

Retailers must request identification for any customer who appears under the age of 25. Acceptable forms of identification include national ID cards, passports, and other official documents displaying date of birth and photo identification. Under no circumstances may a sale proceed if age cannot be verified.

Retail environments must prominently display "18+ Only" signage provided by LLDJ, ensuring that age restrictions are visible to both customers and staff. Retailers are also expected to discourage minors from lingering around points of sale and to prevent adults from purchasing tickets on behalf of minors.

LLDJ periodically communicates with its retail network to reinforce expectations, monitor adherence, and provide updated guidance as needed.

6. Prevention of Underage Access in Digital Channels

LLDJ operates digital platforms, including a website and mobile application, which require additional layers of protection to prevent minors from creating accounts or engaging in play.

LLDJ implements an identity verification process requiring players to provide accurate personal information and official identification prior to accessing gameplay features. No digital account may be activated without verifiable confirmation that the user is 18 or older.

Digital platforms prominently display age restriction notices throughout the registration journey, game pages, and promotional sections. System controls ensure that any inconsistencies in submitted information trigger manual review, account suspension, or rejection of registration.

To reinforce system security, LLDJ's digital operations team regularly monitors account activity and technical measures for potential underage access attempts.

7. Advertising, Communication, and Public Awareness

LLDJ ensures that all communication activities support the prevention of underage gambling. Marketing materials include a clear "18+" message and are designed in a manner that avoids imagery, themes, styles, or placements likely to appeal to minors.

Digital advertising uses available tools to restrict content distribution to adult audiences. LLDJ does not intentionally place advertising in environments predominantly accessed by minors, such as youth-oriented media, educational institutions, or events targeting children.

Public awareness is reinforced through responsible gaming messaging integrated into digital platforms, retailer communications, and player education materials, ensuring the 18+ rule is widely understood.

The **Responsible Advertising & Marketing Policy** complements this policy and governs all creative and placement decisions across channels.

8. Employee Responsibilities and Awareness

Employees are essential to maintaining the integrity of this policy. All LLDJ employees involved in customer interaction, digital operations, compliance, or retail support receive training that covers the importance of underage gambling prevention, the legal and operational requirements, and the expected behaviors associated with enforcing these standards.

Employees are expected to report any observed or suspected violations. Internal communication channels support prompt escalation and resolution of concerns.

9. Monitoring, Enforcement, and Corrective Action

LLDJ conducts ongoing monitoring across retail and online channels to ensure compliance with this policy. Monitoring activities include review of retail conduct, examination of digital account data, and analysis of incident reports or customer feedback.

Where cases of attempted or actual underage gambling are identified, LLDJ takes appropriate corrective action. These actions may include guidance, mandatory retraining, written warnings, temporary suspension, or termination of retailer contracts in severe or repeated cases.

LLDJ maintains internal documentation of reported incidents, investigations, and corrective actions to support continuous improvement and provide evidence for audits.

10. Continuous Improvement and Stakeholder Collaboration

LLDJ engages with stakeholders—including regulators, retailers, NGOs, and industry associations—to enhance its understanding of emerging risks and effective prevention strategies.

Although Lebanon lacks formal structures dedicated specifically to gambling-related harm, LLDJ follows a light-touch collaboration model with local NGOs and community organizations to ensure that credible support services can be referenced when needed.

LLDJ periodically benchmarks its approach against international developments, ensuring that its prevention measures evolve alongside industry best practices and regulatory guidance.

11. Governance and Review

The Executive Management of LLDJ is responsible for the governance of this policy. Implementation is overseen by the Compliance, Operations, Retail, Digital, and Marketing units.

The Underage Gambling Prevention Policy is reviewed annually, or earlier if prompted by regulatory changes, evolving international standards, or internal assessments.