

Responsible Advertising & Marketing Policy
Version 1.0 | 2025

1. Introduction

La Libanaise des Jeux (LLDJ), under the supervision of the Ministry of Finance, is committed to ensuring that all advertising and marketing communications are conducted responsibly, ethically, and in accordance with Lebanese regulations and internationally recognized standards. As a national lottery operator, LLDJ recognizes the importance of maintaining public trust and ensuring that all communications accurately represent its products, safeguard minors, and support responsible play.

This policy outlines LLDJ's principles and commitments regarding the creation, approval, and dissemination of advertising and marketing materials across all media channels. It forms part of the broader Responsible Gaming Framework and is aligned with the World Lottery Association (WLA) Responsible Gaming Framework 2025.

2. Purpose of the Policy

The purpose of this policy is to:

- Ensure LLDJ's marketing practices reflect the company's ethical standards and social responsibility commitments;
- Prevent advertising or promotional content from targeting minors or vulnerable individuals;
- Guarantee that all communications are honest, balanced, and non-misleading;
- Promote responsible play and transparent information;
- Provide direction to internal teams, agencies, and retailers involved in marketing activities.

This policy applies to all advertising and promotional content, across both traditional and digital media, including television, radio, billboards, social media, online platforms, printed materials, sponsorships, and point-of-sale communications.

3. Core Principles of Responsible Marketing

LLDJ's approach to responsible advertising is based on the following core principles:

3.1 Protection of Minors

LLDJ strictly avoids marketing that may appeal to minors, directly or indirectly. Communications must not feature imagery, language, themes, or placements that are likely to be attractive to individuals under 18. All marketing materials must include clear and visible "18+" identifiers.

3.2 Social Responsibility

Marketing must reflect the values of integrity, moderation, and consumer protection. LLDJ's communications aim to present lottery participation as a form of entertainment and must not encourage excessive or impulsive play.

3.3 Accuracy and Transparency

All advertisements must present information truthfully, without exaggeration or misleading claims. Communications must clearly convey the nature of the products, the probability of winning, and any relevant conditions.

3.4 Respect for Vulnerable Groups

LLDJ avoids communications that target or may disproportionately influence vulnerable individuals, including those with financial difficulties or at risk of problem gambling.

3.5 Compliance With Laws and Standards

LLDJ ensures that all advertising practices comply with Lebanese regulations and WLA recommendations. The company also benchmarks its practices against leading international lotteries to maintain a high standard of responsible communication.

4. Protection of Minors in Marketing Communications

LLDJ maintains a strict standard to prevent minors from being exposed to, or influenced by, lottery marketing:

- No advertisement shall depict or be directed toward individuals under 18 years of age.
- Visuals, designs, and messages must avoid styles commonly associated with youth-oriented content.
- Marketing must not be placed in media primarily intended for or accessed by minors, such as children's television, school publications, or youth-targeted platforms.
- Social media targeting must use available age filters to restrict access to adult audiences.
- Retail points of sale must display "18+ Only" messaging clearly and consistently.

LLDJ also monitors the placement of outdoor advertising to ensure that it does not appear near schools, youth centers, or other locations frequently accessed by minors.

5. Integrity and Accuracy in Advertising

LLDJ is committed to ensuring that advertising remains balanced, factual, and free of misleading content. Communications must not:

- Suggest that playing the lottery is a solution to financial difficulties;
- Overstate the chances of winning or present improbable outcomes as likely;
- Imply that lottery play guarantees personal success, lifestyle improvement, or emotional fulfillment;
- Use messaging that creates unrealistic expectations regarding jackpots or prize distributions.

All communications undergo an internal review process to verify compliance with internal standards and relevant regulatory requirements. Key disclaimers, game information, and conditions must be displayed clearly.

6. Responsible Promotion of Gaming

LLDJ promotes gaming as a leisure activity that should be enjoyed responsibly. Advertising should reinforce this message by:

- Presenting lottery participation as moderate and occasional;
- Including responsible gaming reminders where space permits;
- Avoiding portrayals of excessive or compulsive play;
- Ensuring that promotions, bonuses, or events encourage participation without creating pressure or urgency.

LLDJ's promotional activities, including sponsorships, events, and public appearances, must also reflect these principles and avoid creating environments where minors or vulnerable individuals are excessively exposed to lottery-related messaging.

7. Digital Marketing and Social Media Standards

Digital channels represent a core component of LLDJ's communication strategy. As such, the company applies additional responsible marketing controls online:

- Use of age targeting tools to ensure content is presented only to users 18+.
- Clear display of the 18+ icon and responsible gaming messages on all social posts, banners, and sponsored content.
- Monitoring of comments, interactions, and user feedback for signs of misuse, misinformation, or harmful behavior.
- Avoidance of viral engagement tactics that could unintentionally reach minors or encourage excessive play.

LLDJ also ensures that website content, app notifications, and email campaigns adhere to the same standards of accuracy, transparency, and social responsibility as traditional media.

8. Partnerships, Sponsorships, and Public Events

LLDJ engages in sponsorships and public events as part of its community involvement and brand visibility strategy. In doing so, the company ensures that:

- Sponsorships do not associate the lottery with activities primarily targeted toward youth;
- All event branding includes responsible gaming and age restriction messaging;
- Promotional activities are conducted in environments where age verification can be reasonably enforced;
- Staff and representatives are trained to uphold responsible communication standards.

LLDJ also evaluates the social impact of public events and avoids partnerships that could conflict with its responsible gaming commitments.

9. Internal Governance and Approval Process

Before publication or release, all advertising and marketing materials must undergo a structured internal review coordinated by the Marketing and Compliance units. This process includes:

- Verification of responsible gaming messaging;
- Confirmation that no element targets minors or vulnerable groups;

- Assessment of the accuracy and fairness of claims;
- Review of placement strategy to prevent exposure to minors;
- Validation of all mandatory disclaimers and legal texts.

Materials that do not meet the responsible marketing standards outlined in this policy will be revised or withdrawn.

10. Monitoring, Compliance, and Continuous Improvement

LLDJ monitors the performance and social impact of its advertising activities through:

- Internal reviews conducted periodically;
- Feedback from players, retailers, and regulators;
- Assessment of digital interactions and consumer sentiment;
- Benchmarking against international best practices.

When necessary, LLDJ may adjust campaigns, withdraw content, or update its guidelines. The company is committed to continuous improvement and regularly evaluates new international developments, regulatory changes, and best practices in responsible advertising.

11. Governance, Accountability, and Policy Review

The Executive Management of LLDJ ensures that this policy is implemented consistently across the organization. The Marketing, Compliance, and Legal units share responsibility for its day-to-day execution.

The policy is reviewed annually, or earlier if required by new regulations, WLA standards, or operational developments.