

Overview

Brightstar adheres to the Advertising and Marketing Code of Principles to ensure that all promotional activity follows solid principles of responsible marketing. The code applies to all media and/or channels for marketing and/or advertising, including, but not limited to, tradeshow messaging and marketing collateral, direct mail, email or SMS messaging, outdoor, on property, radio, television, film, mobile devices, print including sales brochures, and the internet. The code applies to our B2B marketing activities. Brightstar Lottery (Italy), Brightstar Indiana, and Northstar New Jersey must adhere to their own codes applicable to B2C business.

Brightstar complies with all applicable local, state and federal laws and regulations (“Laws”) regarding marketing and advertising. These Laws may include limitations, restrictions, or other provisions that are different from those identified in the Principles. In such cases, the more stringent of the Laws and/or the Principles would apply. Operators and Lottery Management Services organizations may have different marketing codes to comply with regulatory or contractual obligations and will abide by those codes.

The Company recognizes that our customers are in various levels of maturity with their responsible gaming programs and consideration for specific customers should be considered but not outweigh the guidance in this document. Furthermore, the design and makeup of the product itself should be excluded from these principles and considered in separate guidance for responsible game design and development.

The Company, and, where appropriate, in conjunction with business partners and any applicable third-party vendors, ensures that the content of all promotional material is clear and concise.

General Principles

- Is dignified, clear, correct, legal, respectful, inclusive, and conveys the utmost integrity consistent with the Company’s values
- Adheres to contemporary standards of good taste and does not encourage antisocial behaviors nor include or suggest violence, illegal behavior, or behavior that is knowingly culturally unacceptable in a particular jurisdiction
- Maintains respect for the individual without degrading persons based on gender, sexual preference, age, race, religion, marital status, or socioeconomics
- Complies with trademark and licensing standards
- Recognizes diversity in all channels and not limited to audience and media

Responsible Gaming Principles

- Emphasizes the fun and entertaining aspects of playing lottery products and/or the public benefit derived from such play, does not denigrate a person who does not play or unduly praise a person who does, and does not play into personal financial difficulties by implying a win will change life for the better
- Does not portray product abuse, excessive play, preoccupation with gambling or any illegal activity, and it does not suggest in any way that excessive, irresponsible, or illegal gaming is an amusing or acceptable behavior, nor does it encourage anonymous play or secrecy around gambling

- Does not glamorize inappropriate use of the product and is not knowingly placed adjacent to other media glamorizing or dramatizing inappropriate use of the product. Inappropriate can be considered as positioning in a way that is culturally or socially in poor taste or encourages product use with other potentially addictive products
- Does not imply or state that gambling activity will elevate or guarantee an individual's social, financial, or personal success, nor will it play into an individual's self-esteem or imply gambling will enhance their likeability or attractiveness
- Does not promote gaming as an alternative to employment or investment, as a guaranteed or likely way to financial security, or as a means of relieving personal financial difficulties
- Does not contain false promises or present winning as the probable outcome or imply that a chance of winning increases the longer a person plays
- Does not suggest that skill can influence the outcome of non-skill-based games
- Does not give rise to the hope in players' minds that all the participating players will win high prizes
- Does not create a false sense of urgency or pressure that would cause a reasonable person to feel they must act quickly to participate or win
- Does not directly advertise or target vulnerable populations or disadvantaged groups or encourage problem gambling, or play on fear or superstitions through the use of cultural symbols or references
- Does not seek to attract persons less than a jurisdiction's legal age to play (through the selection of media, style of presentation, content or context in which these appears)

Underage Prevention Considerations

- Does not directly advertise or target underage individuals
- Does not feature individuals who are, or appear to be, underage
- Does not appear in media nor print, at venues or at any event directed primarily to underage audiences or in broadcast programs where most of the audience is reasonably expected to be below the legal age to participate in any gambling activities in their jurisdiction
- Does not appear on reproduced or merchandised material such as clothing, equipment or products intended for use by minors
- Does not appeal to minors through:
 - Colorful and exaggerated animated characters that are common in children's cartoons such as animals, pirates or fairy-tale characters
 - Comic figures which have particular appeal to minors
 - Other fictional characters which have particular appeal to minors, such as superheroes
 - Celebrities from movies, programs or events where the primary audience is minors

Informed Play Principles

- Where possible and appropriate, clearly contains the following elements:
 - Responsible Gaming features
 - Convey that players must be of legal age to play
 - Remind players to please play responsibly
- Where possible and appropriate, contains an overall odds statement or terms and conditions when advertising a particular game or series of games
- Makes reference to the local gambling addiction referral information as appropriate and reasonable using language that is sensitive and respectful to any individual in active addiction