
RESPONSIBLE MARKETING POLICY

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1. PURPOSE

This policy establishes guidelines and robust principles to ensure responsible marketing practices across all promotional activities supported by Brightstar Lottery (Brightstar). This policy also supports the delivery of Brightstar’s sustainability strategy, which is guided by three key elements: Empowering Our People, Collaborating with Partners, and Preserving the Planet.

These elements are activated through six spheres of impact, which are dedicated actions that ignite change. They include employee engagement; human rights; responsible gaming; community engagement; sustainable procurement; and climate action, biodiversity, and circularity.

At Brightstar, responsible gaming refers to how the Company contributes to player protection by promoting positive play, raising awareness of responsible gaming tools, and securing third-party credibility through accreditation and research. The Company’s responsible marketing initiatives support one sustainable development goal (SDG), as defined but the United Nations:

SDGs	
	<p>Goal 3: Good health and well-being Ensure healthy lives and promote well-being for all at all ages.</p>

Please refer to the section “4. Principles” of this Policy for further details.

2. SCOPE

The policy 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, outdoor, on property, radio, television, film, mobile devices, print including sales brochures, and website. The scope of this policy is limited to the Company’s business-to-business (B2B) marketing activities. Any Company activities supporting business-to-consumer (B2C) activities are subject to their own specific policies and guidelines.

The Company recognizes that its customers are in various stages of maturity in their responsible gaming programs and consideration for specific customers should be considered but not outweigh this policy’s guidance. Furthermore, the design and makeup of a product itself should be excluded from these principles and considered in separate guidance for responsible product design and development.



3. REFERENCES

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 Section No. 4 (Principles). In such cases, the more stringent of the Laws and/or the Principles applies. Operators and lottery management services organizations may have different marketing codes or policies to comply with regulatory or contractual obligations.

This policy supports the following standards by applying their founding principles. Each term is defined in Section No. 10 (Definitions):

Industry Standards

- World Lottery Association Responsible Gaming Principles
- European Lottery Association (EL) Responsible Gaming Standards
- NASPL RGV Standards
- NCPG iCAP Standards

Internal references

This policy, and its implementation, are supported by several Brightstar internal documents and policies. They include:

- Code of Conduct
- Responsible Gaming Policy
- Product Responsibility Policy
- Global Sustainability Policy

4. PRINCIPLES

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. The Company is committed to abstaining from misleading or misinforming customers about competitors' products or services.

General Principles

Material:

- 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 behavior nor include or suggest violence, illegal behavior, or behavior that is knowingly culturally unacceptable in a particular jurisdiction.
- Maintains respect for individuals without degrading persons based on gender, sexual orientation, 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 and does not promote discrimination through stereotypes, inferences, or slang in wording or pictures.



- Is respectful and does not make light fun of the serious nature of mental health and addiction or denigrate those with such conditions.

Responsible Gaming Principles

Material:

- 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 product use and is not knowingly placed adjacent to other media glamorizing or dramatizing inappropriate product use. Inappropriate can be considered as positioning material 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

Material:

- Does not directly advertise or target underage individuals.
- Does not feature individuals who are, or appear to be, underage.

- Does not appear in media or 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 materials 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 that have particular appeal to minors.
 - other fictional characters that have particular appeal to minors, such as superheroes.
 - celebrities from movies, programs or events where the primary audience is minors

Informed Play Principles

Material:

- Where possible and appropriate, clearly contains the following elements:
 - Responsible gaming features
 - Conveyance that players must be of legal age to play
 - Reminders that players should please play responsibly or appropriate prevention language.
- 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 localized gambling addiction referral information as appropriate and reasonable using language that is sensitive and respectful to any individual in active addiction

5. IMPLEMENTATION AND MONITORING

To verify implementation and monitor the effective application of the policy, specific periodic monitoring mechanisms have been established, such as a compliance process for reviewing corporate marketing materials. This includes review and approval by a responsible gaming subject matter expert. Materials may include, but are not limited to interviews, articles, advertisements, white papers, blog posts, promotional videos, and social media. B2C materials are not included in this monitoring as they are subject to customer guidelines and/or contractual requirements.

6. COMMUNICATION AND TRAINING

Communicating commitments over time stimulates continuous improvement and supports corporate reputation, a sense of belonging, and engagement. This policy will be made available to all relevant interested parties and is publicly accessible through appropriate communication channels, including the Company’s official website



(www.brightstarlottery.com). Marketing employees also receive training on this policy and related compliance processes.

7. ROLES AND RESPONSIBILITIES

The Director of Responsible Gaming and Community, as a member of the Global Sustainability team, owns this policy and is accountable for its implementation and for monitoring compliance across all operations. At Brightstar Lottery, the Global Sustainability team manages sustainability matters within the Branding, Communications and Sustainability department, reporting to the Senior Vice President of that department and to the Sustainability Steering Committee (SSC). The SSC cultivates a long-term vision and objectives for sustainability, ensuring a consistent sustainability approach across all regions and businesses, and increases communication surrounding sustainability activities by sharing best practices at global and local levels. The SSC reports to Brightstar’s Nominating and Corporate Governance Committee (NCGC) — which monitors Brightstar’s sustainability strategy — and to the Board’s Executive Chair, who oversees the Company’s corporate governance and sustainability initiatives, and provides strategic guidance. This structure guarantees that responsible gaming stewardship remains embedded in decision-making and operational practices throughout the organization.

8. REPORTING CONCERNS

This policy and examples of its implementation are reported to WLA and iCAP auditors for certification purposes.

Employees who are aware of perceived violations of this policy should immediately report incidents to any member of Brightstar’s management team, the People & Culture function, or to the Integrity Line (managed and operated by an independent third party), which can be accessed via the following:

- Online Portal: <https://brightstarlottery.integrityline.com>
- From the United States and Canada call: 1-888-807-4832
- From Italy call: 800194674
- From all other locations, first call the country-specific AT&T Direct Access Code found at <https://www.business.att.com/bt/access.jsp> and then call 888-807-4832.

Agents and representatives of Brightstar, third parties, and members of the public are also encouraged to report any perceived violations of the Company’s principles to the Integrity Line. Reports to the Integrity Line can remain anonymous, if desired.

9. HISTORY OF THE DOCUMENT

The policy is periodically reviewed and updated to ensure that it remains relevant and effective.

History of the Document		
Date	Version	Updates
April 2026	Version 1	First release



10. DEFINITIONS, ABBREVIATIONS, ACRONYMS

The following table shows specific terms used in the policy and a brief definition of them.

Term/Abbreviation	Definition
B2B	Business-to-business marketing activities directed toward organizations rather than individual consumers.
B2C	Business-to-consumer marketing activities directed toward individual consumers and governed by separate guidelines or contractual requirements.
iCAP	Internet Compliance Assessment Program, developed by the National Council on Problem Gambling
NASPL	North American Association of State and Provincial Lotteries, which provides responsible gaming and advertising standards.
NCPG	National Council on Problem Gambling
Responsible Gaming (RG)	Principles and practices aimed at preventing gambling-related harm and promoting safe and responsible participation.
RGV	Responsible gaming verification program
SME	Subject matter expert; an individual responsible for reviewing marketing materials for policy compliance.
WLA	World Lottery Association, an international body setting standards for responsible lottery operations and marketing.

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