



HITS & MISSES

*An Examination of Meta's
Political Ad Policy Enforcement
in Bangladesh*

2023

digitally right

HITS AND MISSES: AN EXAMINATION OF META'S POLITICAL AD POLICY ENFORCEMENT IN BANGLADESH

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KEY TERMS

Terminology

Explanation

Ad Library

Meta Ad Library is an online platform that enables users to do searches for presently live advertisements associated with any Facebook page across various countries (Meta, 2023c).

Awami League (AL)

AL is one of the leading political parties in Bangladesh and has been in power since 2009. It was founded as the Awami Muslim League in 1949 and renamed the 'Awami League' in 1972.

Bangladesh Election Commission

The Bangladesh Election Commission, an independent constitutional body, is entrusted with the enforcement of election laws and rules in Bangladesh.

Bangladesh Nationalist Party (BNP)

BNP is one of the major political parties in Bangladesh which was founded in 1978.

Digital platforms

Google search engines, Facebook, Spotify, YouTube, and similar Internet and web-based virtual spaces are digital platforms that use unique business models to exchange information, knowledge, goods, ideas, and services for financial or non-financial gains (Manpreet, 2020).

Facebook

Facebook is a social networking platform that is owned by Meta.

Facebook advertisement (or Facebook ad)

An advertisement on Facebook has a resemblance to sponsored posts in that, with their textual content, images, or videos, they consistently include the name and profile picture of a Facebook page as their "author" (Edelson et al., 2020).

Keywords

A keyword is any meaningful term or phrase, particularly one that is used to define the contents of a document.

Meta	Meta Platforms Inc., doing business as Meta, and formerly named Facebook Inc., is the company that owns and operates Facebook, Instagram, Threads, and WhatsApp, among other products and services.
Over-enforcement	Over-enforcement by Facebook in the case of a political ad signifies undue takedown of the ad, which does not fall under the Meta political ad policy (Pochat et al., 2022; Meta, 2023b).
Paid for by	Meta has introduced a requirement to add a 'Paid for by' disclaimer to political ads on Facebook to accurately document the individuals or organizations responsible for running these ads (Meta, 2023d).
Political ad policy	Meta flags an ad as political when that: (a) is made by, on behalf of or about a candidate for public office, a political figure, a political party, a political action committee, or advocates for the outcome of an election to public office; (b) is about any election, referendum, or ballot initiative, including "get out the vote" or election information campaigns; (c) is about any social issue in any place where the ad is being run; or (d) is regulated as political advertising (Meta, 2023b).
Political advertisement (or Political ad)	A political advertisement on Facebook refers to a sponsored message that includes content about social issues, elections, or politics and corresponds to the Meta Political Ad Policy (Meta, 2023b).
Under-enforcement	Under-enforcement occurs when political ads on Facebook are made available due to incorrect enforcement of the Meta political ad policy (Meta, 2023b).

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EXECUTIVE SUMMARY

The advent of digital technology and social media has revolutionized political and electoral campaigns by offering a cost-efficient method to connect with a wide audience. Advertising extends the reach of political campaigns further and often leads to the misuse of social media platforms, spreading false information, dividing political discussions, and manipulating voters.

In Bangladesh's 2018 national election, political parties and candidates were reportedly estimated to be spending approximately 2 billion (BDT 200 crore) on digital platforms, including Facebook, YouTube, WhatsApp, Twitter, and Instagram, for their campaigns. Similarly, preceding the January 2024 national election, political parties and candidates are using social media ads to communicate their political messages and influence public opinion.

Being the largest social media platform by the number of users and the only one among major platforms offering political ads disclosures, this study aims to analyze the Meta Ad Library to identify the current trends in political advertising on Facebook that the platform defines as "Ads about social issues, elections, or politics." It assesses how well Meta detects political ads and ensures transparency on its platforms and explores the factors that influence its efficiency.

The main data source for this research is the Meta Ad Library, covering the period from September 7, 2022, to September 7, 2023. During this timeframe, the database recorded a total of 62,455 political ads, with a combined spending of US \$369,786.

The research points out challenges in both over-enforcement and under-enforcement of Meta's political ad policy in Bangladesh. It reveals that advertisers often slip through Meta's review process and get away with inadequate or vague disclaimers. A notable number of ads targeting Bangladeshi users were incorrectly labeled as political, and ads coming directly from political actors escaped detection.

Here are a few key findings of the study:

- About 25% of the advertisements from pages of different categories: commercial, news and media, and others, were flagged as political while the ads were not political in nature.
- The indiscriminate application of certain political keywords (including but not limited to "Minister" and "Winner") and social issues (keywords such as education and migration), without considering context, led to the inaccurate categorization of political advertisements.
- Inconsistencies were observed in identifying a political ad; the same ads were categorized as political when run from one page but not on another. Simple product promotions, especially from companies owned by political figures, were often identified as political.
- Fifty active advertisements obtained through keyword searches, containing clear political messages and images, evaded Facebook's detection system. Out of them, 48% originated directly from the pages of political figures and parties.
- In several instances, Facebook has taken months, and sometimes a year, to recognize an ad as political and stop it from running, for not providing disclaimers.
- In at least 9 cases, entities paying for advertisements managed to run political ads on Facebook without providing any disclaimer information and the platform accepted the inadequate disclaimers undermining its own policy.
- Of the analyzed disclaimers, only 17% included complete and operational addresses, while 80% were vague or incomplete (lacking in detail), underscoring the platform's inadequate effort in verifying the functionality and correctness of the information.

The failure to detect political advertisements creates an uneven playing field, providing certain political entities an edge and leaving voters vulnerable to manipulation and misinformation. Over-enforcement negatively affects advertisers by rejecting legal advertisements, leading to missed opportunities for businesses and suppressing lawful expression on the platform. Advertisers evading transparency deprive people of essential information about who is funding and supporting a particular ad, preventing voters from understanding the interests and affiliations behind the messages they encounter.

This study emphasizes the need for improved transparency in online political advertising and offers a set of recommendations. These include the Election Commission mandated political ads disclosures for all platforms, conducting regular audits on keywords specific to Bangladesh to avoid incorrect or no detections, working with stakeholders to clarify the categorization of ads related to social issues, and making all ads publicly available for a specified period, aligning with practices in the European Union. It also highlights the crucial role of government and civil society in urging platforms to uphold democratic processes, advocating for country-specific policies, and ensuring accessible data.



INTRODUCTION

Political advertisements significantly impact democratic processes by shaping public perceptions of political systems and leadership. Politicians use it to amplify their messages to the public, enabling them to make well-informed political choices and voice their thoughts on public policy. Political ads function as the most dominant form of communication between voters and candidates, particularly before elections (Kaid, 2004).

The history of political advertisement dates back to the 1950s with the advent of television in the United States (John F. Kennedy Library, 2004). GroupM, one of the world's top paid advertising companies, anticipates that a staggering \$15.9 billion will be spent on advertising in the upcoming US elections alone, solely owing to the rise of social media platforms (The Guardian, 2023). This suggests that

the advent of digital technologies and social media has brought about a significant transformation in electoral campaigns worldwide, enabling political actors to efficiently engage with a vast audience at a minimal expense. Although the change has the potential to magnify various viewpoints, these emerging technologies have also been “misused to spread false information, fragment political debate and manipulate voters” (News European Parliament, 2023). The infamous Cambridge Analytica scandal serves as a prime example in which the personal data of millions of Facebook users was obtained without their consent, primarily for targeted political advertising that ultimately influenced election outcomes (Hern, 2018). This incident brought the role of social media platforms in elections under extensive scrutiny and heightened the demand for more transparency in

political advertising practices on these platforms.

Bangladesh is anticipating a national parliamentary election in January 2024, which is already tainted by prevalent online misinformation, propaganda, and hate speech (Islam and Khan, 2023). The political rivalry between parties has escalated on social media platforms as 'parties strategise for extensive campaigns in the lead-up to the election' (Bhattacharjee and Apu, 2023a).

One way to gauge social media's influence in Bangladesh is by the number of users, which reached 44.70 million in January 2023. This figure encompasses 34.5% of the population aged 18 and above, according to Data Reportal, a global digital insights website (Kemp, 2023). According to OSSGA (2023), Facebook has the highest number of users at 43.25 million, followed by YouTube with 34.40 million. By the end of 2021, TikTok apparently eclipsed Instagram in terms of Google search interest.

Political advertising on social media is particularly important for Bangladesh, a nation with a dwindling civic and democratic space, as it gives all political parties, politicians, and civic actors a platform to express their opinions and reach a larger audience, regardless of their position and power (CIVICUS, 2023; Zakaria, 2023). It allows the users to get diverse political views, facilitating the ability to make an educated decision. Furthermore, the presence of a transparent electoral and political advertising mechanism on platforms allows users to easily identify the source of the message, the financial

resources spent on the campaign, and the entities providing funds for the advertisement.

Each major platform has its own specific transparency policy for political advertisement. However, TikTok prohibits political advertisements in all jurisdictions, and X (formerly Twitter) permits such ads only in nine countries (TikTok, 2023; X Business, 2023). While Google allows political ads in Bangladesh, transparency data specific to the country is unavailable (Advertising Policies Help, 2023). Among the major platforms, only Meta offers data on political ads related to elections, politics, and social issues in Bangladesh. It allows for a detailed analysis of patterns in political advertising, the entities behind the advertisements, and the amount of money spent. Hence, the primary objective of this research is to assess the platform's openness and the efficacy of its enforcement strategy via the analysis of data obtained from the Meta ad library.

Examining Meta's implementation of transparency in political advertisements in Bangladesh is of utmost importance due to many factors. Weak enforcement or the failure to detect political advertisements creates an uneven playing field, providing certain political entities an edge and leaving voters vulnerable to manipulation and misinformation. Conversely, over-enforcement of political advertising policies negatively affects advertisers by rejecting advertisements that adhere to the rules, leading to missed opportunities and suppressing lawful expression on the platform. Lastly, in Bangladesh, election regulations

mandate the need for transparency in campaign spending. Effective enforcement of online advertisements enables the EC and election watchdogs to closely monitor election campaigns and spending.

Multiple studies examined the enforcement of political ads policy on various platforms in different jurisdictions and on a varied scale. Nevertheless, there has been no comparable investigation carried out in Bangladesh. Therefore, the current study examines the enforcement of Meta's political, electoral, and social issues-related advertisements in Bangladesh through an analysis of data available in the Meta Ad Library and assessment of both the detected and undetected political ads content on the platform. The principal aim of this study is to examine the effectiveness of Meta, the largest social media platform in Bangladesh based on the number of users, in enforcing its guidelines to detect political, electoral, and social issues-related advertisements.

Research Question

The main question of this study is: How effective is Meta in enforcing its guidelines to detect ads related to political, election, and social issues in Bangladesh?

To address the main research question mentioned above, this study collected and analyzed data in a Bangladesh specific context by focusing on the following four sub-questions:

1. Who run political and election-related ads targeting Bangladeshi users?
2. How effective are Meta's systems in detecting political ads on its platform?
3. How effectively does Meta ensure transparency in advertiser disclosures?
4. What are the factors that affect the effectiveness of the Meta Ad policy enforcement?

This research advances our understanding of political advertising on Facebook in Bangladesh and uncovers potential patterns of over-enforcement, indicating that a notable percentage of ads detected as political do not reflect political content. It identifies instances of under-enforcement, specifically focusing on political advertisements that Facebook has not categorized correctly, and points out transparency challenges faced by the advertisers of political content. This study provides suggestions to enhance the accountability and transparency of political advertising on Facebook, both in Bangladesh and beyond.

BACKGROUND

Bangladesh is set for its twelfth national parliamentary election on January 7, 2024. The incumbent Awami League (AL) administration is committed to conducting the election as scheduled, while its main political opposition, the Bangladesh Nationalist Party (BNP), has chosen to abstain from participating, demanding a caretaker government to oversee the voting (Bhattacharya, 2023). Regardless of their positions on electoral engagement, both parties have intensified their conflict on social media sites, often using political advertisements (Bhattacharjee and Apu, 2023b).

Political advertising on social media platforms is not a new phenomenon in Bangladesh. In the 2018 national election, parties and candidates were estimated to be spending about 2 billion (BDT. 200 crore) taka for electioneering on digital platforms and

used Facebook, YouTube, WhatsApp, Twitter and Instagram for their campaigns, according to media reports (Islam, 2018). In 2023, political parties are investing significant amounts of money in Facebook advertisements to spread their political ideas and influence public opinion. Both the AL and BNP are said to be increasing their presence on social media platforms leading up to the national election (Bangladesh Awami League, 2023; Chowdhury and Shishir, 2023).

The electoral Code of Conduct of Bangladesh, titled '*Jatiyo Sangsad Nirbachoni Achoron Bidhimala, 2008*', governs campaigning activities during the parliamentary election period. The Election Commission (EC), by its authority under Article 92B of the Representation of the People Order of 1972, formulated this Code, demanding transparency in election campaign

expenditure from political parties, candidates, and their supporters. Nevertheless, the Code offers little guidance on the substance and scope of candidates' indirect campaigns, resulting in ambiguity and often chaos (Rahman, 2018). The EC imposes restrictions on campaign spending based on certain criteria, providing guidelines for conducting physical campaigns. However, the application of these regulations to internet advertising remains ambiguous (Rahman, 2023).

There are three crucial reasons to regulate and identify political and electoral ads on social media platforms: political communication, mandate accountability-check and influence on deliberation (Sosnovik et al., 2023). Political communication helps understand how candidates and parties present themselves, provide messages, and prioritize policies (Sosnovik et al., 2023). A mandated accountability-check is essential for assessing whether elected officials fulfill promises made during elections (Sosnovik et al., 2023). And, influence on deliberation assumes rational voter decision-making, underscoring the need to consider these issues in designing and implementing social media platform policies and country-based regulations (Sosnovik et al., 2023).

As the largest social media platform in the country and the sole provider of public data on political ads on its platforms for Bangladesh, Meta's disclosures regarding social issues, elections, or politics-related ads are crucial for Bangladesh elections and political advertising in general. This allows the EC and other interested parties to oversee the expenditure of

candidates and parties, regardless of their participation in the election, on campaign activities. It also enables monitoring of the sources of funding for advertisements, the content of campaigns in relation to disinformation, hate speech related to political matters, and any attempts to suppress voter turnout, among various other concerns.

Meta enforces regulations pertaining to advertisements concerning social issues, elections, or politics, delineating the parameters of such advertisements and mandating that advertisers complete an authorization procedure that encompasses identity and location verification (Meta, 2023a; 2023d; 2023e). After obtaining authorization, advertisers must designate their ads as a 'Special Ad Category' and include a 'Paid for by' disclaimer containing websites, phone numbers, email addresses and addresses. Political ads are stored in the Meta Ad Library for seven years once classified.

Meta relies on proactive compliance by ad sponsors to maintain its policy and claims to review all submitted ads for policy compliance, with automated assessments being the primary method (Meta, 2023d). Non-compliant ads are stored in the Meta Ad Library with a notification stating 'this advertisement was displayed without a disclaimer' (Meta, 2023a; 2023f). Infringing pages could be disabled or subject to restrictions on the placement of new political advertisements (Meta, 2023a).

To establish accountability, Meta offers three transparency tools:

- The Ad Library: an online platform allowing users to search for active

advertisements across Meta platforms, providing access to both active and inactive political ads.

- The Ad Library API: facilitates automated inquiries about current and inactive political ads, offering distinct identifiers, impression counts, expenditure figures and campaign duration for each ad.
- Ad Library Report: compiling a comprehensive list of pages featuring at least one political ad during the selected timeframe.

A study reveals significant shortcomings in Meta's enforcement practices, with 61% more ads going undetected than identified worldwide (Pochat et al., 2022). In the United States (US), 55% of the ads that are detected are found to be non-political in nature (Pochat et al., 2022). The efficacy of detection systems varies among nations, with some areas seeing a much higher percentage of "false negatives" (ads that go undetected) compared to the United States. This discrepancy is especially prominent for sites that have overtly political content (Pochat et al., 2022). Among the 38,110 advertisements scrutinized during the 2018 Brazilian elections, 2.2% (835 advertisements) were erroneously classified or deemed non-political (Silva et al., 2020).

The inadequacy of enforcement is seen in breaches of political advertising policies, exemplified by advertisers running undisclosed political ads (Silva et al., 2020; Edelson et al., 2020; Pochat et al., 2022). Adversarial political advertisers are found to bypass transparency requirements by using misleading disclaimers and engaging

in undisclosed coordinated behavior across Facebook, Google, and Twitter (Edelson et al., 2020).

Despite the growing significance of political advertising on social media platforms, there remains a noticeable gap in the research concerning the examination of Meta's political advertisements' enforcement, specifically in the context of Bangladesh. The existing body of literature lacks a comprehensive understanding of how Meta's policies and enforcement mechanisms operate in this particular socio-political landscape, leaving crucial questions unanswered. This research aims to bridge this gap by shedding light on potential challenges and providing insights into the platform's role in shaping the dynamics of political communication and transparency in the lead-up to the national parliamentary election.

RESEARCH METHODOLOGY

This study has employed a multi-method research approach to examine the enforcement of Meta's guidelines regulating political ads on Facebook related to politics, elections, and social issues. The data collection relied on quantitative analysis of the Meta Ad Library data and content and key informant interviews.

The methods included comprehensive desk research to provide a broader contextual understanding, specific keyword searches within Ad Library to document undetected political ads, qualitative analysis of political ads obtained through purposive sampling to understand the trends in over-enforcement, and key informant interviews to get insights into challenges and recommendations.

This section provides an overview of the methodology and the datasets

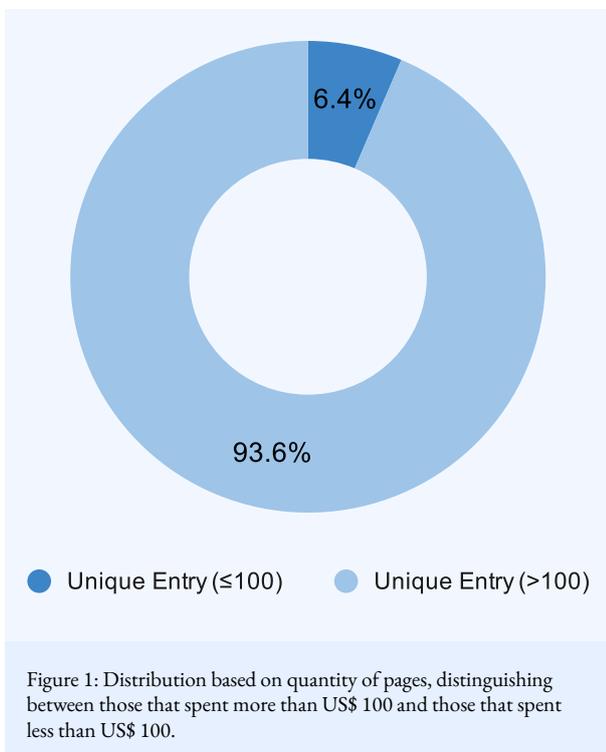
gathered for this study, underlining the ethical considerations and research limitations as well.

Data Collection

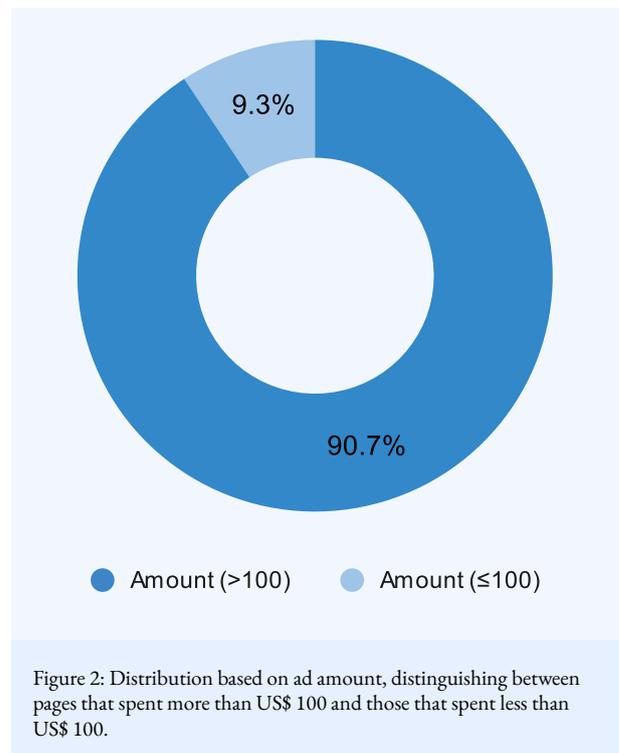
Source of data: The primary data source analyzed for this research is the Meta Ad Library, covering ads from September 7, 2022, to September 7, 2023. The database was filtered by country to extract advertisement data targeting users in Bangladesh and downloaded for analysis.

Facebook page sampling: Within the specified timeframe, approximately 5,522 distinct pages displayed a total of 62,455 political advertisements on Facebook. Meta categorizes political

ad spending into two primary groups: those spending more than US\$ 100, labeled as >100, with exact amounts specified in the dataset, and those spending about or less than US\$ 100, labeled as "≤100". Despite constituting only 6.5% of the total entries, 355 unique pages of users directed towards Bangladesh with more than US\$ 100 spending contributed to over 90% of the total expenditure. This study analyzed 355 pages that spent more than US\$ 100 to understand advertising trends.



Facebook page categorization: Facebook pages disclose their type, which includes businesses, educational services, sports, non-profits, personal blogs, interests, communities, and so on, in the page transparency section. This study classified 71 types into four broad categories: 'Political' (politicians, election candidates, political parties), 'Commercial' (selling products and services), 'News and



Media' (newspapers, publications, and media websites), and 'Others'. During the current research period, at least nine pages or their advertisements were removed and thus categorized as 'Unavailable' in this study for analyzing over-enforcement and under-enforcement trends.

Sampling for content analysis: Out of the 355 pages running political ads, 72 identified themselves as 'political'. This study has considered ads from politicians and political parties as genuinely political and analyzed content from the remaining 283 pages to identify cases of over-enforcement. Out of the 43,630 political ads run by these pages, we analyzed a sample of 1,420 ads using purposive sampling. For each page, we sampled the six most recent ads, and all ads were considered for pages with fewer than six ads in the Meta Ad Library.

Content analysis: Three research volunteers independently evaluated each of the 1,420 ad samples, relying on Meta's political ad policy as a tool (Meta, 2023a). The study examined the content of an additional 683 detected political ads that Meta stopped running for not providing disclaimers, along with 50 ads from under-enforcement samples. This analysis informed specific case studies and examples outlined in the study, aiding in the identification of patterns in the mis-detection.

The study also analyzed 'Paid for by' disclaimers from the Meta Ad Library to evaluate the transparency of advertisers and their effectiveness in the ad review process.

Keyword search: To identify potentially political but undetected ads, researchers searched the library with a list of 30 keywords in four days between June 20 and September 10, 2023. The keywords included names of political parties, top political leaders, and common political words and hashtags associated with campaigns.

Key informant interviews: Five key informants from civil society, academia, law and the digital marketing community provided expert insights and recommendations through interviews conducted via Zoom video conferencing. The interviews, lasting between 35 to 40 minutes, were conducted using a semi-structured questionnaire, with one respondent providing written answers. To protect the privacy of key informants, their names are kept anonymous.

Desk research: An extensive desk research was conducted to review existing literature and platform policies, contributing to an understanding of Meta's political ad policy enforcement in other jurisdictions and the broader impact of political advertisement on the democratic process. The findings supported a comparative analysis of trends in the present research.

Research Limitations

Certain limitations warrant acknowledgment in this research. A narrow set of keywords was employed to identify advertisements meeting the criteria for inclusion in the Meta Ad Library. And, as Meta's political ad guidelines do not include a list of social issues in the context of Bangladesh, the keywords for this research are not inclusive of any social issues as such. For this reason, the current study may not comprehensively cover data related to social issues within the specific context of Bangladesh. Moreover, accurately measuring the number of undetected political ads poses challenges, as those are only available in the library when active.

ANALYSIS OF FINDINGS

This chapter contains an analysis of the findings from this study. It is divided into four sections with each discussing who runs the political ads, the ads which have been wrongly detected

as political, ads that have evaded detection in spite of their political nature and transparency of advertisers themselves.

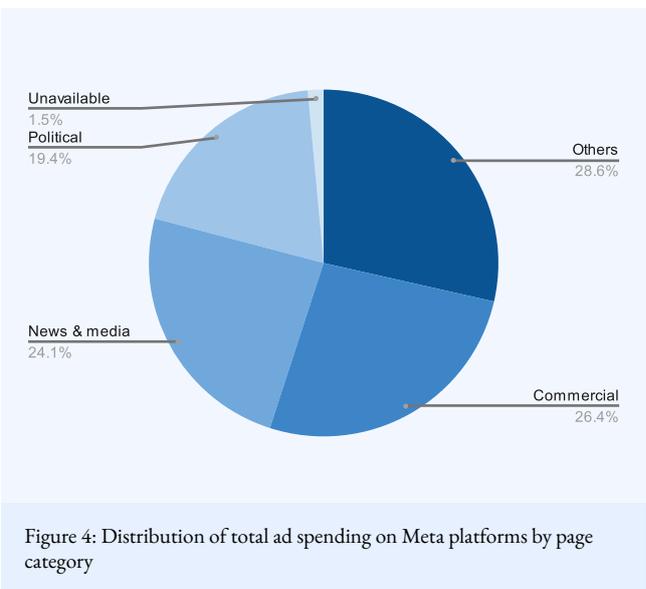
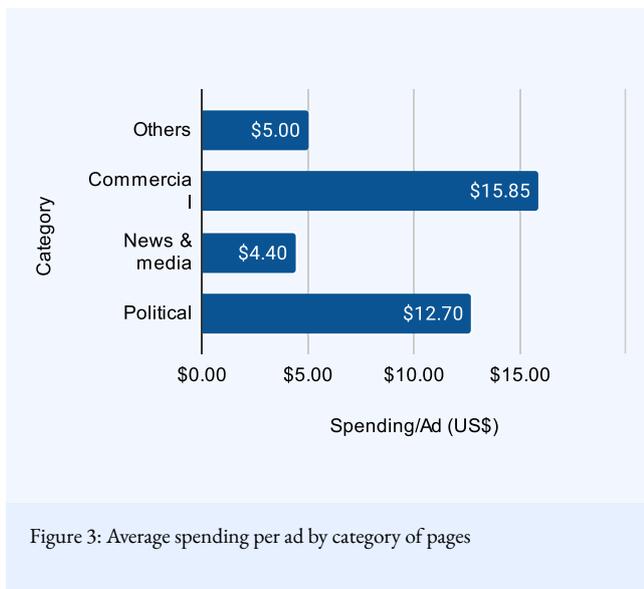


Table 1: Top 10 in spending in Political category

Page name	Amount spent (USD)	Page identified as
BNP Media Cell	9751	Political Organization
Zunaid Ahmed Palak	7544	Politician
Bangladesh Nationalist Party-BNP	6233	Political Party
Abul Khair Abdullah	3658	Politician
Nouka Manei*	3151	Political Organization
Mohammad Abdus Salam	2866	Politician
Bangladesh Awami League	2856	Political Organization
Lion Alhaji Mohammad Imran*	2110	Political Candidate
Mahmud Hassan Ripon	1953	Politician
Gujab Noy Shotto Janun*	1882	Politician

*Transliterated into English from the original page name in Bengali language.

Who Run Political Ads

Since September 7, 2022, Meta has provided access to political advertisement data for Bangladesh. The following year, advertisers collectively spent around US\$ 370,000 to reach millions of users in the country. In order to better comprehend the provider of political advertisers and expenditure trends, political advertisement-containing pages were classified into four categories: Political, Commercial, News and Media, and Others. According to the findings of this study, the 'Commercial' category spent the most, despite having the lowest number of ads. 'News and Media'

pages consistently ranked second in spending.

According to the data, the expenditures for commercial pages exceeded US\$ 88,609, news-related pages incurred US\$ 81,016 and political pages concluded the year with US\$ 65,142. Notably, political and commercial pages spent a much higher average expenditure per advertisement, over three times that of news and media, and others categories.

The spending in the political category is relatively straightforward, with 72 pages identifying themselves as political entities, such as politicians or political organizations. The dominant political streams in ads are the AL and the BNP.

Table 2: Top 5 in spending in Commercial category

Page name	Amount spent (USD)	Page identified as
Nagad	35846	Financial service
Shofol Bangladesh*	8451	Publisher
Panjeree Publications Ltd.	7292	Publisher
Bangabandhu Online Archive*	5995	Publisher
Razzak Fashion	5262	Clothing (Brand)

*Transliterated into English from the original page name in Bengali language.

Table 3: Top 5 in spending in News and Media category

Page name	Amount spent (USD)	Page identified as
Press Xpress	11739	News and media website
BD Peoples Voice	7377	News and media website
Jodi Kintu Tobuo*	4190	Media Agency
Bhalor Pothe*	3103	News and media website
Abija*	2839	Media/News Ccompany

*Transliterated into English from the original page name in Bengali language.

Table 4: Top 5 in spending in Others category

Page name	Amount spent (USD)	Page identified as
Amar Netri Amar Ahongkar*	7627	Public Figure
a2i - Aspire to Innovate	5204	Government Organization
Banglar Samachar*	5129	Interest
Peoples Voice	4378	Interest
Positive Bangladesh	4311	Arts & entertainment

*Transliterated into English from the original page name in Bengali language.

BNP largely disseminated its messages via the BNP Media Cell and the official party page. In contrast, AL used several politicians and supporter pages in addition to their official party pages, as seen by the top ten political pages list. Among political organizations or affiliated wings, BNP Media Cell spent the most amount of funds towards Facebook advertisements. In terms of individual politicians, Zunaid Ahmed Palak, a State Minister and Member of Parliament (MP) from the ruling party, had the top position in terms of expenditure. (All data used in the above charts were obtained in September 2023)

The classifications of Commercial, News and Media, and Others are more complex than the political classification. There are hundreds of pages in each of these categories that self-identify as news providers, arts and "interest" pages, or publishers, and purport to be unrelated to politics. However, they consistently distribute political advertisements and act as political actors. The above charts offer just a glimpse of this complexity. It is important to note that any individual or page can run political ads on Meta platforms. However, the data raises an important question about how the platform implements transparency standards for political advertising, specifically in terms of how it distinguishes between non-political and political ads in this complex area. The subsequent parts of this report will examine it, through detailed content analysis and case studies.

Detected But Not Political

Over-enforcement, as discussed in this study, refers to advertisements detected or declared on Meta platforms as political when their content does not meet the platform's definition of political. This situation may arise when advertisers voluntarily declare an ad as political and when the machine learning algorithms employed by Meta may inaccurately detect an ad as political, prompting advertisers to provide a disclaimer. Such ads are archived in the Ad Library.

This study analyzed 1,420 advertisement samples from the Ad Library that were posted by pages in the non-political category, as according to Meta, all ads from political parties and politicians are considered political. The analysis revealed that about 25% of the advertisements from non-political pages (i.e., commercial, news and media, and others categories) were incorrectly detected as political, suggesting an over-enforcement. Meta's political advertising policy was followed during the evaluation (see Methodology).

Among the advertising categorized as 'News and Media', 19% were incorrectly detected as political, while 22% of the ads in the 'Others' category faced the same misclassification. However, the highest rate of false positives (i.e., ads erroneously identified), at 43%, occurred in the 'commercial' pages, making it the most adversely impacted by over-enforcement.

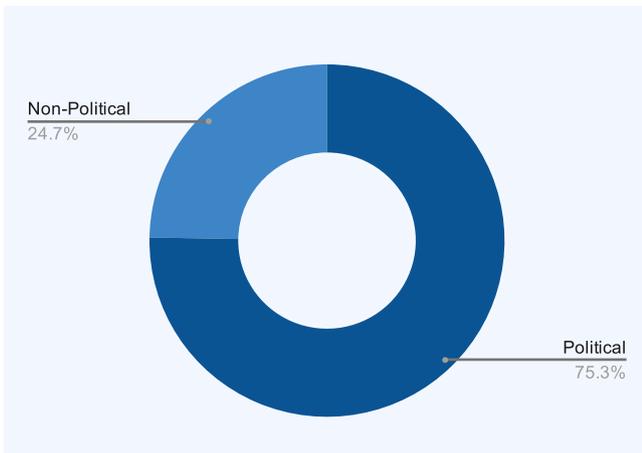


Figure 5: 25% of the political ads from non-political pages are over enforced

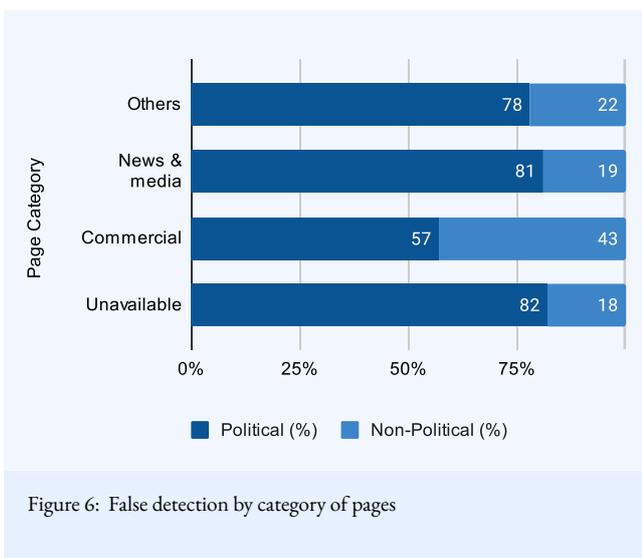


Figure 6: False detection by category of pages

Meta's policy states that if ads lack a disclaimer and the content pertains to social issues, elections, or politics, they will be disapproved during the review process (Clegg, 2023). In the case of ads already running, if automated systems or community reports flag them and they are found to violate Meta's policy due to a missing disclaimer, the ads would be disapproved and added to the Ad Library.

To understand the incorrect detection or over-enforcement, the study reviewed 683 ads that its systems identified as political and stopped running for lack of disclaimers. The

following key findings are based on this content review conducted in the first two weeks of September 2023.

- The study identified mis-detections where ads from commercial pages associated with political figures as even simple product promotions from companies owned by those political figures faced incorrect categorization.
- Ads promoting the sale of guidebooks, textbooks, novels, stories, magazines and services related to employment opportunities, studying abroad and visa applications were mistakenly categorized as political. There is no publicly available list of social issues specific to Bangladesh, but it appears that there are incorrect detections even for a social issue or related keywords.
- Commercial pages faced challenges due to keyword-related issues, where seemingly innocuous terms like 'Minister' triggered the classification of electronic appliance advertisements and marriage matchmaking services as political ads. Keywords like 'winner' and references to specific events led to the misclassification of ads.

What is really responsible for such over enforcement is often hard to comprehend as outsiders have little knowledge on how detection algorithms work, but the following sections with specific case studies provide a glimpse of the problem.

Inconsistency: Nagad, a digital financial services company, spent US\$ 35,846

on ads during the research period, the highest amount among all pages, and Facebook classified 137 of its advertisements as political. Some of these contents featured photos or names of prominent political figures, and contained keywords such as 'Shorkar' (government), pension scheme (a government scheme), and 'Smart Bangladesh' (a political vision turned slogan). While these factors might justify the classification of these ads as political, there are instances of simple product promotions being enforced as such. In September, an analysis was carried out on 24 Nagad advertisements that Facebook had ceased running due to the absence of disclaimers. It revealed that the majority of these ads

pertained to activities such as internet and electricity bill payments, as well as mobile recharges, which were not connected to political matters.

The potential correlations between the enforcement of advertisements and the ownership or management of a company, especially when said company is owned or managed by political figures, remain uncertain. Nagad has been repeatedly reported in the media for its political connections, and its Managing Director, Tanvir A Mishuk, whose personal page is also listed for running political ads, was prominently featured in most of Nagad's advertisements (The Economist, 2020).

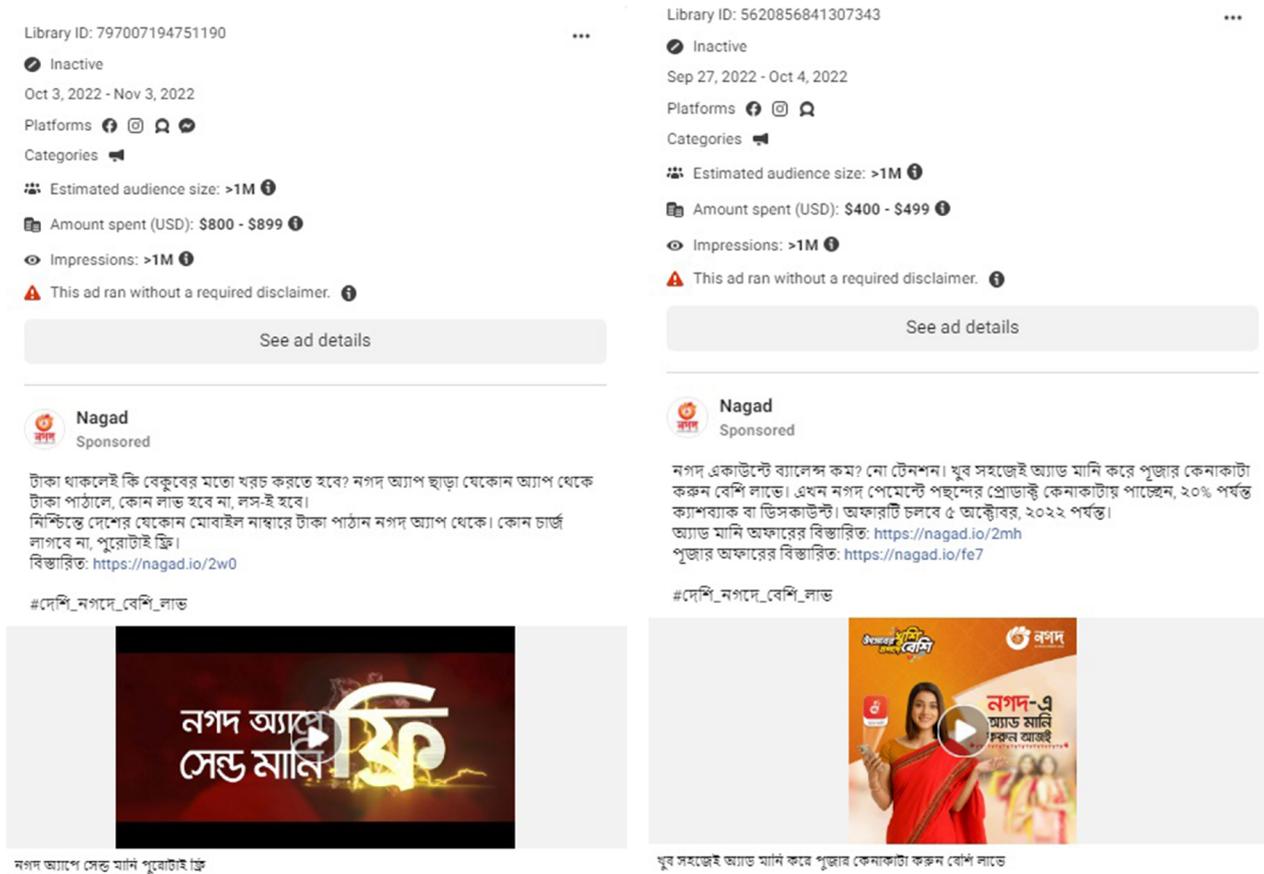


Image 1: Screenshot of two Nagad ads that were detected as political

In the case of the Beximco Group, which is owned by Salman F Rahman, a political personality and an adviser to the Bangladesh Prime Minister's Private Sector Industry and Investment, a similar pattern was observed. About 130 advertisements from the Beximco Group page had been classified as political. Many of these advertisements include posts celebrating festivals, such as Eid, Bengali New Year, and Buddha Purnima (birth anniversary of Gautam Buddha, the founder of Buddhism) or promoting its business.

Social Issues: In the commercial category, Panjeree Publications ranks second with 471 political advertisements and an expenditure of over US\$ 7,000. None of the 23 advertisements from this publication, which were stopped from running due to the absence of disclaimers,

contained any political pitches or statements. All of Panjeree Publications' ads focused on promoting the sale of guidebooks or textbooks with a simple message regarding how these materials would aid in preparation for Secondary School Certificate (SSC) and Higher Secondary Certificate (HSC) examinations.

Facebook also categorized ads from 20 other publications and bookstores as political. While some of these books may touch on political topics, the majority are simply novels, stories, magazines, and guidebooks for job-related or public exam preparation. Another example is 'migration'. Ads from six pages specializing in career possibilities, studying abroad and visa applications were also categorized as political.

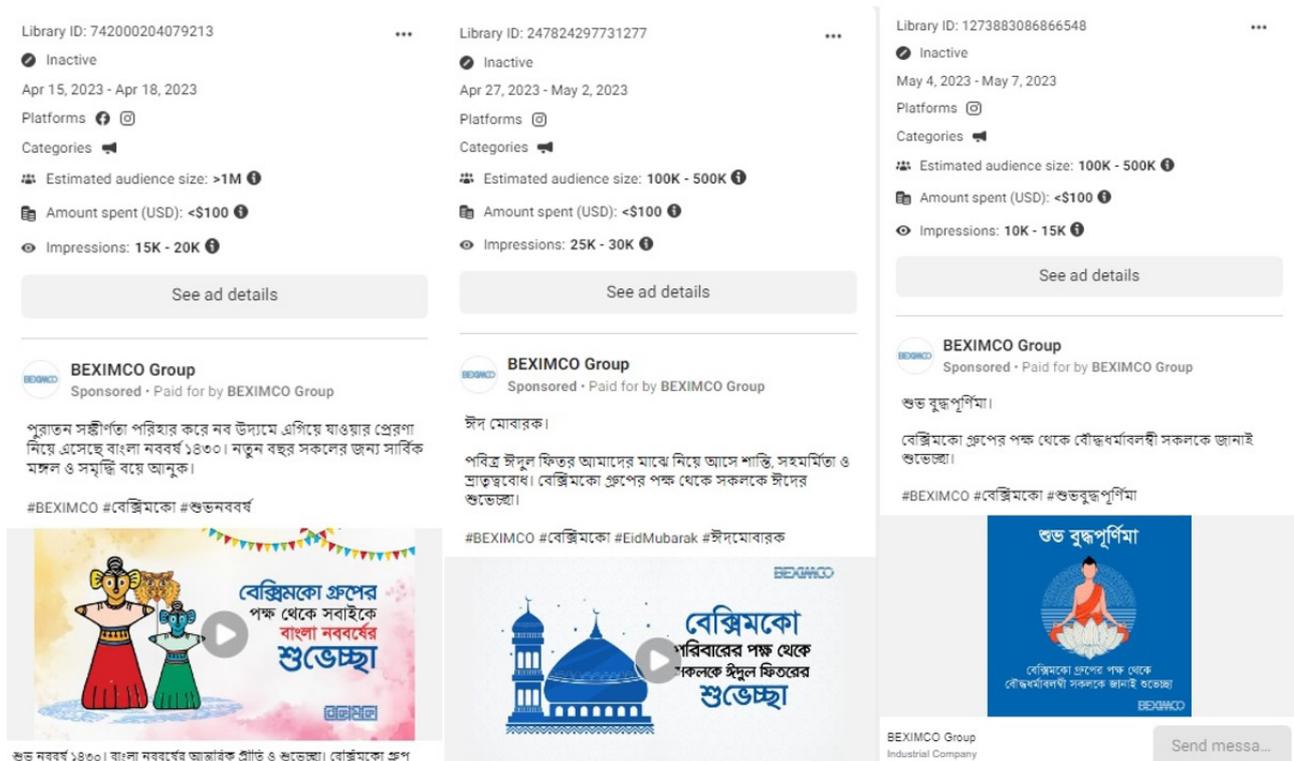


Image 2: Screenshots of Beximco Group's ads which were detected as political ads

Facebook does not publicly provide a comprehensive catalog of social issues particular to Bangladesh, unlike its operation in 14 other countries, including India and Myanmar (Meta, 2023e). Nevertheless, a review of advertising data clearly indicates the application of political ad classifications to a variety of social issues, encompassing civil and social rights, crime, the economy, education, environmental politics, health, immigration, and governance—categories that exist on India's list (Meta, 2023g).

Social issues play a significant role in shaping political discourse. The data on political ads in Bangladesh prompts the question of whether Facebook should provide a comprehensive list of social issues for Bangladesh in order to enhance transparency.

Keyword difficulty: According to Facebook's policy, "Ads where the primary purpose is the sale of a product or promotion of a service might not be considered social issue ads and might not require authorizations and a disclaimer" (Meta, 2023h). However, a review of the number of ads discontinued for not having disclaimers suggests that commercial entities frequently become victim to keyword-related issues. 'Minister' is an example of such a case. Findings suggest Facebook considered 'Minister' as a political keyword. Eventually, it marked seven advertisements from 'Minister Hi-Tech Park' – a company that sells electronic appliances like TVs, fridges, fans, etc., and promotes their products exclusively – as political ads. One of their 'political ads' was just wishing everyone a happy Eid (greetings to the Muslim community at the biggest religious festival).

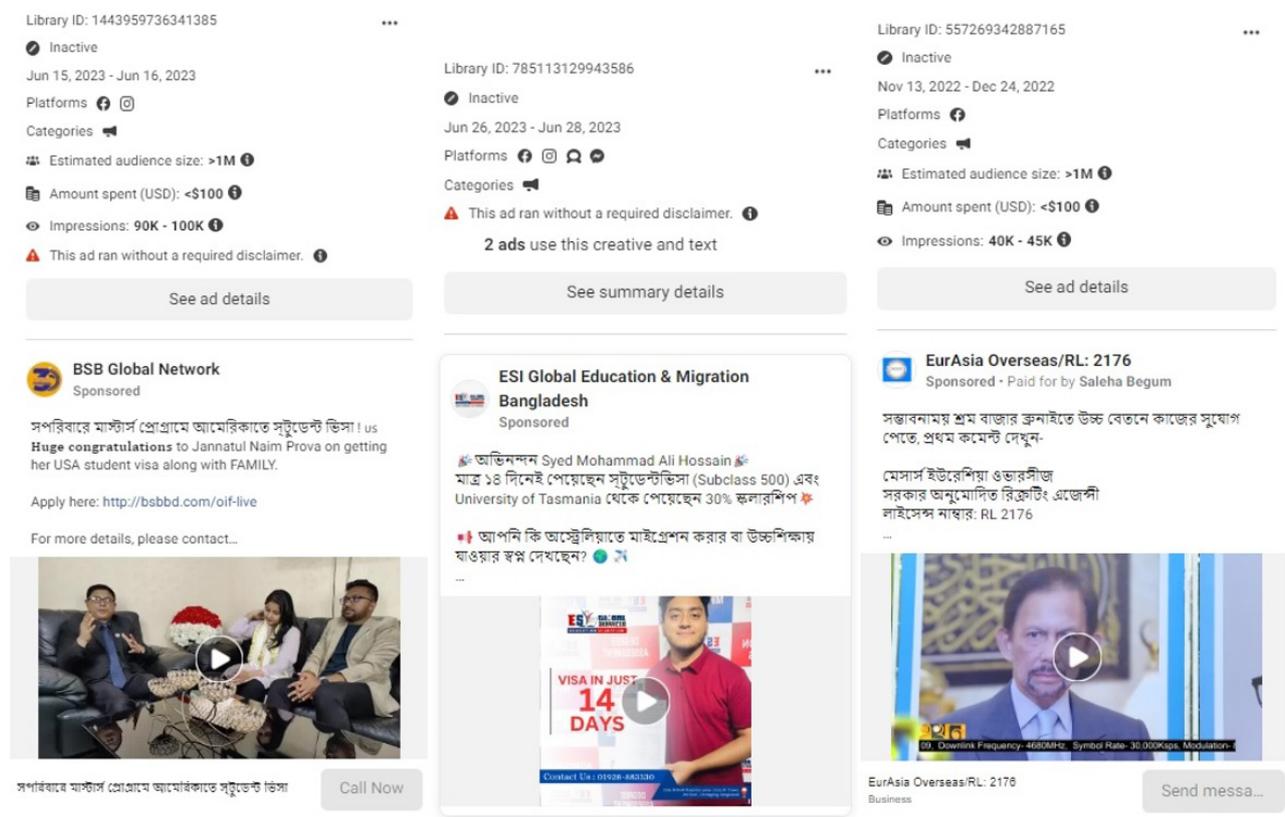


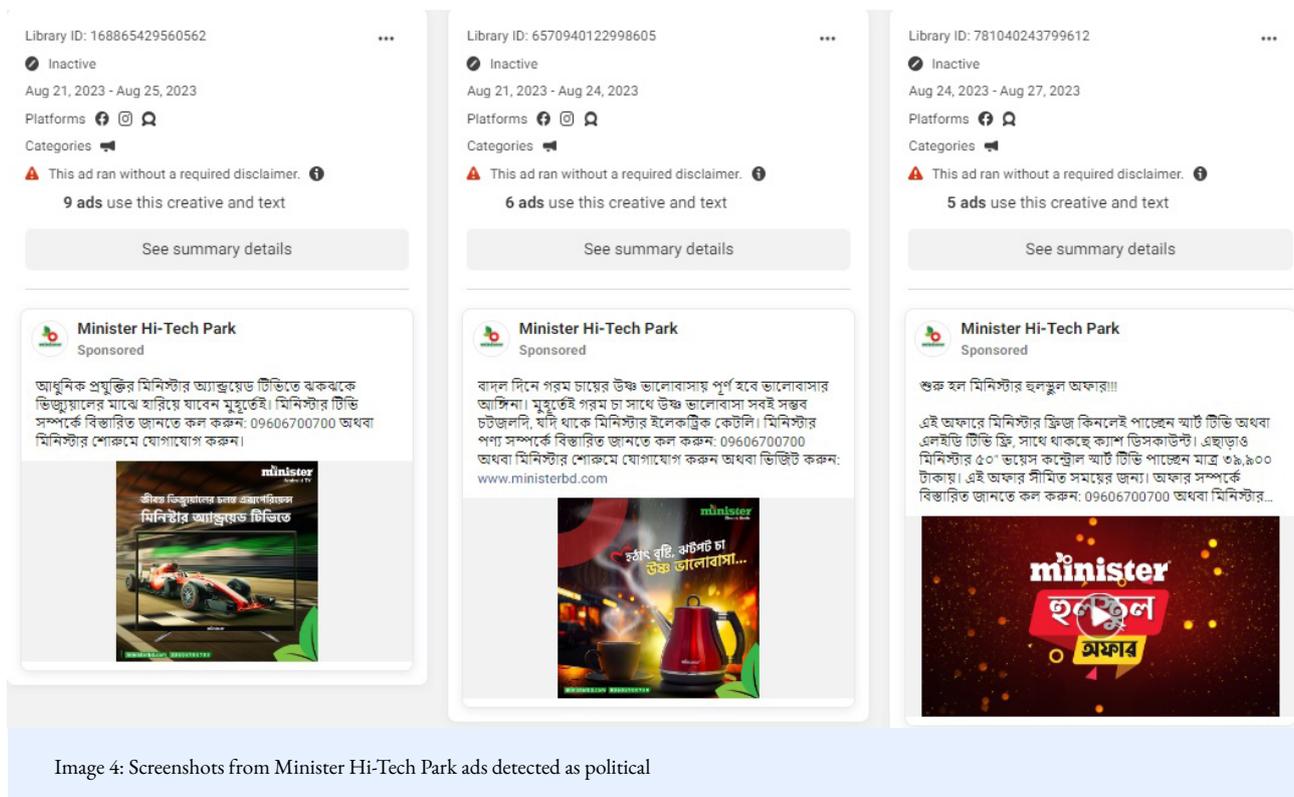
Image 3: Screenshots of ads from two education consulting and travel agent company

The 'Biyer Khoj Marriage Media' page serves as another instance where political ad detection relied solely on specific keywords in the ads. The page, identified as 'Marriage Therapist', runs advertisements claiming to find life partners for people. The advertisements claim to have identified suitable matches for professionals such as physicians, engineers, Bangladesh Civil Service (BCS) cadres and army officers, as well as for those who are offspring of 'secretaries, MPs, ministers'. Evidently, the use of the terms 'secretaries, MPs, ministers' contributed to the identification of these advertising as political.

'Prachurja: Automated Prize Bond Checker' is another page that spent US\$ 1156 on 27 advertisements throughout the period examined in this study. They provide SMS service to prize bond winners through the app, and advertisements run from their

page are strictly related to the said service. Facebook has flagged those as political advertisements. It seemed 'বিজয়ী' (winner) was a keyword that triggered this categorization. This study found about two dozen ads promoting different competitions with the keyword 'winner' flagged as political.

In addition, a page ran 31 advertisements in honor of the International Collegiate Programming Contest (ICPC) held in Dhaka in 2022. Out of the 31 advertisements, Zunaid Ahmed Palak could be seen on six of them, while the rest included the names of the prize winners and messages about the contestants' experiences and evaluations. Irrespective of that, Facebook marked all 31 advertisements as political.



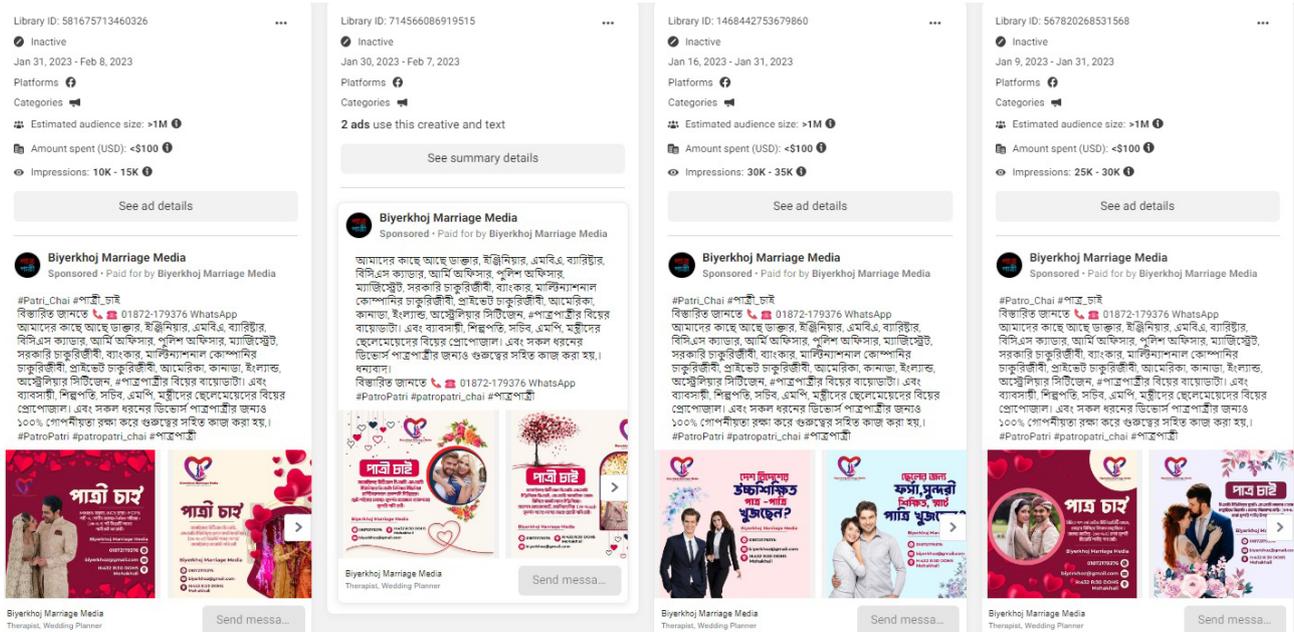


Image 5: Screenshots of a Marriage Media page that falls victim to keywords

Political But Not Detected

The under-enforcement is much worse in ramifications because it undermines the entire purpose of political ad transparency. When there's under-enforcement, it represents a pure failure of the transparency system, which then hinders the ability to study and leads to missing significant portions of political advertising on the platform, including key elements. To understand the under-enforcement in political ads targeting Bangladesh, this study relied on keyword search within the Meta Ad Library.

The Meta Ad Library archives political, electoral and social issue ads, whether they are active or inactive, and retains them for seven years. Non-political ads, however, are only accessible in the Ad Library when they are active.

If an ad includes a political message that Facebook does not categorize as political, it will no longer be available in the Ad Library once the campaign ends.

The study used 30 keywords related to election, political parties, and politicians to identify the active advertisements with political content that Meta categorized as non-political. The search in the Meta Ad Library was conducted four times between June 20 and September 10, 2023.

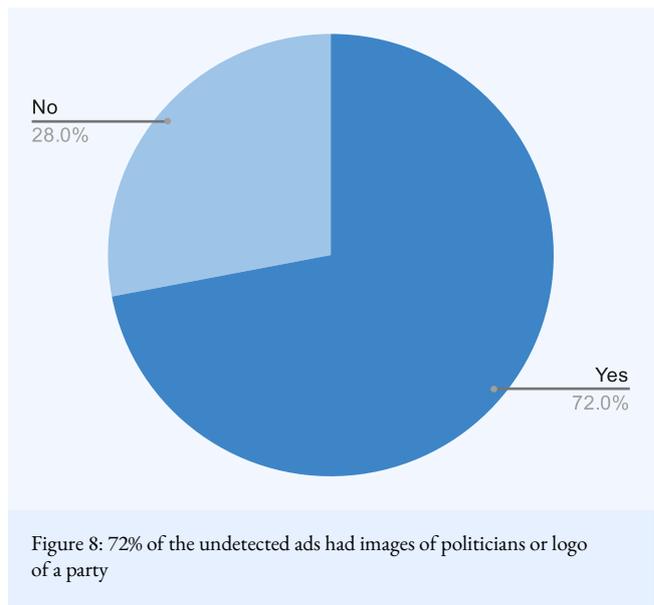
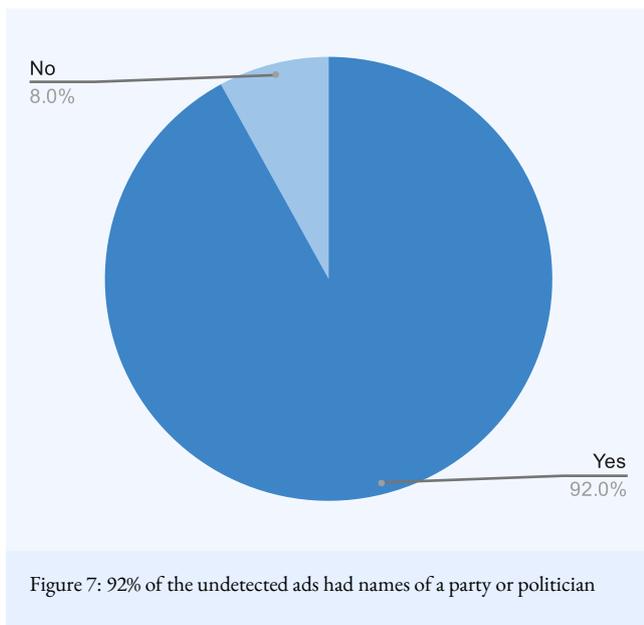
Undetected Political Ads: Several active pages from politicians and political parties managed to evade identification, despite the fact that the ad content included political messages and images. Here are a few key findings:

- The study found that 50 active advertisements contained clear political messages and content that escaped Facebook's detection

system. These ads ran without a disclaimer and were not added to the Ad Library after their campaigns concluded. It includes personal political campaigns of politicians and members of parliaments, promotion of political activities like rallies, and comments on political situations.

- Interestingly, 48% of these pages, which ran these ads, self-identified as political organizations or political figures in the “about” section of pages.
- The majority of the undetected advertisements, over 90%, prominently displayed the names of a political party or a political person.
- And, 72% of these ads included photos of a political leader or the insignia of a political organization.

Small and overlooked: Facebook’s enforcement of political advertisements for subdivisions of political parties or organizations (i.e., a local unit of a major political party) has proven to be



ineffective, creating difficulties for users in determining the amount of money being spent by these entities and the identities of their financial backers. For example, at least two units of Bangladesh Jamaat-e-Islami, a political party in Bangladesh, ran ads that were not detected as political. Similarly, a Bangladeshi ‘nationalist’ student forum based in the United Kingdom, and claiming to be a political organization in the About section, escaped detection. The ad, demanding the resignation of Bangladeshi Prime Minister, is still available in the library because, under the platform’s policies for the European Union, any ads targeting that jurisdiction are stored for at least one year (Clegg, 2023).

Inconsistent detection: The findings of this study reveal that the enforcement of political and electoral advertising rules often lacks consistency when applied to both individuals and commercial pages.

- The same advertisement, containing a political message, was identified as political when it was shared by

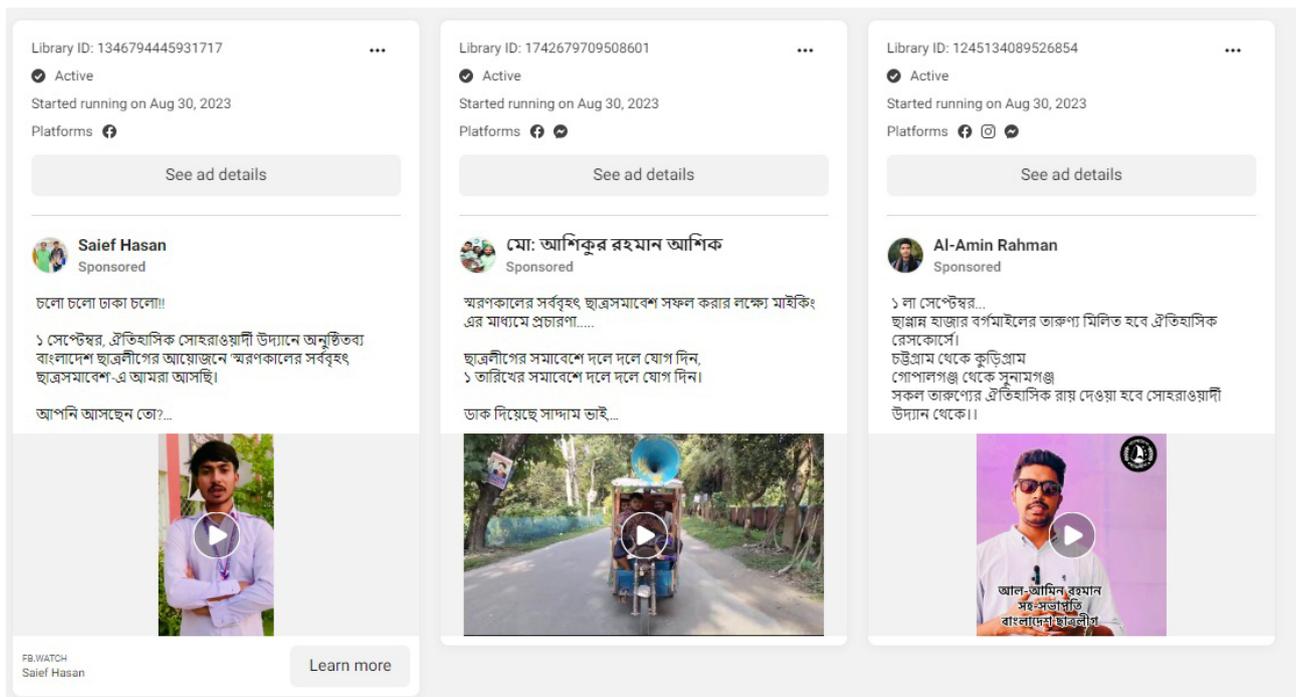


Image 6: Screenshot of active political ads calling to join a political rally went undetected

a page affiliated with a political group but went undetected when disseminated by one of its fans.

- In at least two cases, a page shared two identical political ads on the same day. One was categorized as political while the other was not.
- Three posts by self-identified political activists were advertised with calls to participate in a political rally by the student wing and affiliate of the ruling party. Despite the strong political connotation of the content, it was neither identified as political nor added to the library.
- On at least five occasions, pages purporting to be news and fashion platforms managed to evade detection while displaying political advertisements including political demands and featuring prominent political individuals.

Slow response: If an ad is not declared political and Facebook later identifies it as such – the ad is deactivated with the note “These Ads run without a disclaimer” and added to the Ad Library. Facebook often requires many months, and sometimes even a year, to identify an advertisement as political and prevent it from appearing without disclaimers. For example:

- A state minister ran 30 ads from his official and verified page, and only without any disclaimers since 2018. Facebook added disclaimers in ads on this page only from April 2023. Facebook detected three similar ads from this page in six, eight, and 18 days, respectively.
- In a specific instance, an advertisement conveying a political message remained undetected for a duration of 372 days, despite a modest expenditure of around US\$

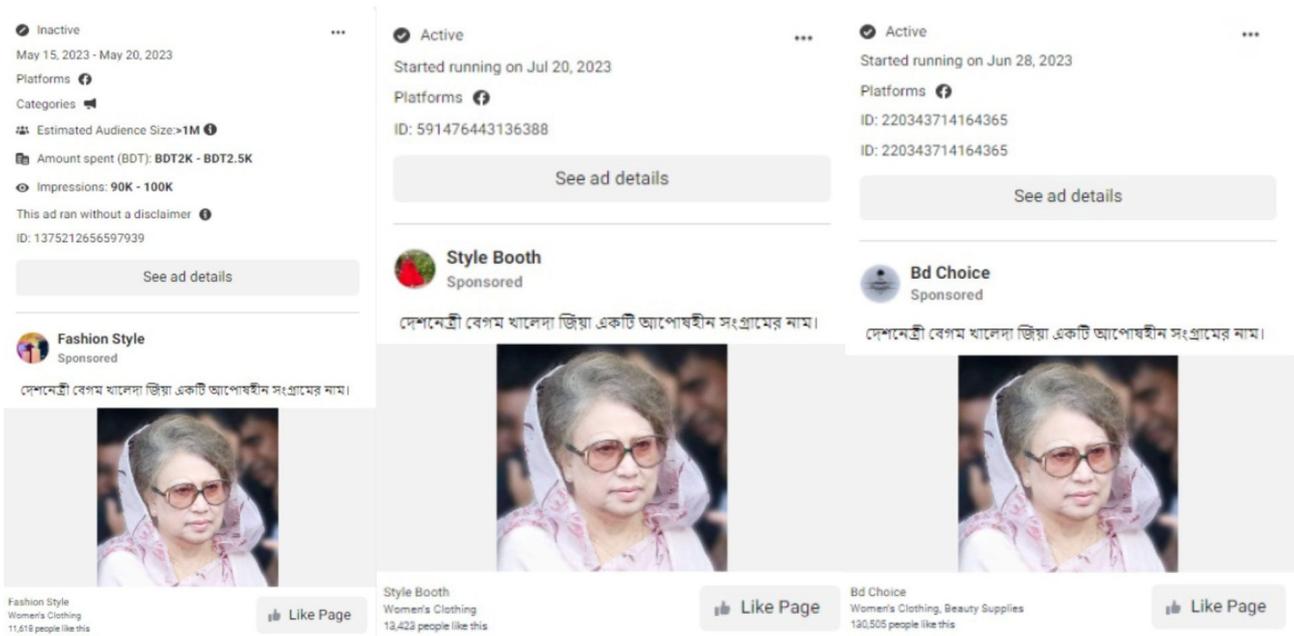


Image 7: Screenshots of ads with an image of a politician went undetected

300 and the accumulation of over a million impressions. Facebook has taken between one week and 79 days to add a disclaimer to the advertisements in at least 30 cases.

Transparency of Advertisers

To ensure transparency, Facebook requires advertisers to add a 'Paid for by' disclaimer to political ads. The disclaimer requires the advertisers (or who pays for the ad) to provide a website address, phone numbers, email and a location address. This section examines whether the advertisers maintain this transparency requirement adequately and how Meta

enforces its transparency standards for political ad providers.

There were 384 entries for advertisers (not pages, but the entity that paid for ads) that spent more US\$ 100 on ads in the research period, and 70 entries did not provide any disclaimers. Eventually, Facebook stopped running those ads. To examine advertisers' transparency, this study analyzed 314 entries based on four types of transparency information.

Inadequate information: The analysis looked at four pieces of transparency information they provided and found:

- In nine cases, the advertiser failed to submit any of the four required pieces of transparency information but was still authorized to display political advertisements on Facebook, and Facebook accepted

the insufficient disclaimer. Among the nine advertisers, one was a political candidate for mayoral election and a well-known politician.

- Ten advertisers – which include at least two politicians who declare themselves as such in page transparency– provided only the phone number and location address. The disclaimer information did not include any email or website.
- Eight more advertisers failed to offer a website URL, and two other advertising entities did not provide a location address.

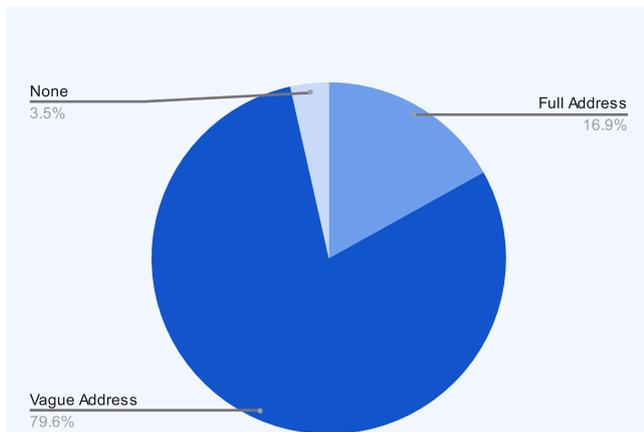


Figure 9: Quality of addresses given in disclaimers

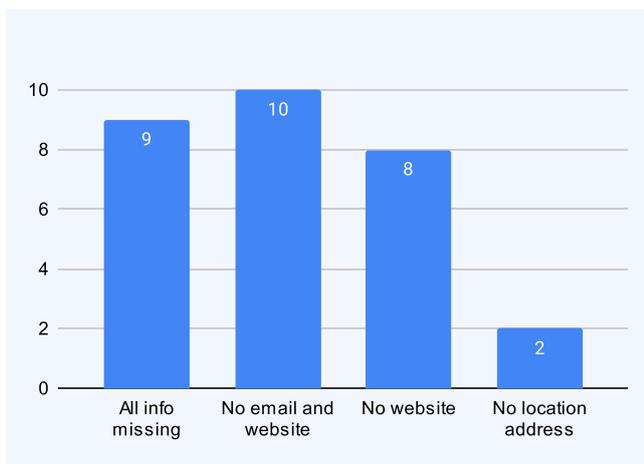


Figure 10: 9% of entries had no or missing disclaimer information

Vague addresses: Meta advertising guidelines state that the phone, email, website, and location address must be functional and correct at all times (Meta, 2023i). However, when it comes to email and location address, the study finds:

- Out of the 314 disclaimers, just 17% had complete and operational addresses, while in 80% of instances, the address provided was ambiguous or lacking necessary information.
- About 47% of the disclaimers use only the name of a district (for example, Mymensingh, Mymensingh | Sylhet, Sylhet | Narsingdi, Narsingdi | Khulna, Khulna, etc.) as their addresses.
- 32% of the disclaimers used accurate and functioning website URLs. Approximately 58% of the disclaimers used a Facebook page URL in lieu of a website.

Little or no verification: It is not clear how Facebook addresses the problem of no or vague disclaimer in political ads. In many cases, pages ran political ads without providing sufficient information in disclaimers for months and even years. It implies that once disclaimer information is provided, there is little effort in verifying “functionality” and “correctness” of the information. As a result, to the users, the idea of identifying who is spending money for political advertisement remains as vague as the information advertisers provide in disclaimers.

RECOMMENDATIONS

This study has surfaced potential areas that demand attention and improvement for transparency in online political ads in Bangladesh. Based on the study's findings and key informant interviews, the following recommendations ask to establish state-mandated regulations to ensure transparency from platforms and a greater auditing and monitoring framework by engaging academics, researchers and civil society.

1. Audit Detection Algorithms:

Platforms, such as Meta, should conduct regular audits on keywords tailored to the Bangladeshi context to ensure accurate labeling in classifying political ads. These audits may focus on refining training data sets that inform algorithms, minimizing over-enforcement. According to experts interviewed, collaborations with stakeholders, including the EC, election watchdogs, researchers and civil

society, can enhance the effectiveness of these audits by providing context-specific insights and evaluations.

2. Mandated Transparency: To foster transparency, the Election Commission may mandate all platforms to disclose political ads policies that are specific to the country and provide access to pertinent data. "It would be nice to have government-mandated transparency about what is a political ad and how these should be made transparent and what information should be made transparent because things like targeting criteria still aren't being made transparent by the platforms," said an informant who has researched the same topic (Interviewee #01). "This is, I think, valuable information," the interviewee added.

3. Develop Election Campaign

Guidelines: To clarify regulations for online advertising and campaigning in

Bangladesh, the Election Commission (EC) guidelines must explicitly include provisions for overseeing online political campaigns. A constitutional law expert and key informant (Interviewee #04) emphasizes that the EC should prioritize establishing efficient techniques to evaluate expenses linked to political advertisements on Meta platforms. Another informant (Interviewee #05) suggests that political disclosure should occur at the level of the election commission or other stakeholders, allowing parties to self-disclose all their official pages.

4. Publish List of Social Issues:

Meta should collaborate with local stakeholders to establish and publicly disclose a comprehensive list of relevant social issues specific to each country. Describing existing categories for other countries as “incredibly broad and incredibly vague,” one informant (Interviewee #02) stressed the need to “publish a list of what you actually define, what you actually mean by social issues in the context of Bangladesh.” Another informant (Interviewee #01) pointed out that in all countries where Meta operates and practices political ad transparency, effort should be made to definitively list issues termed as political.

5. Archive and Display All Ads: “There is no need for advertisers to self-declare whether an ad is political or not, and there is no need for Facebook to have to develop systems that clearly don’t work very well to distinguish between political ads and non-political,” said one informant (Interviewee #02). “So partly I think there should be transparency and a database for all ads.” There is wide agreement among experts interviewed

that Meta should display and archive all ads uniformly across all jurisdictions as it does for the EU to comply with the Digital Services Act.

6. Invest in Human Review: Platforms must invest in more human reviewers with specific knowledge of the local political landscape and language. Having more human reviewers enables a deeper understanding of local nuances, languages, and political dynamics, leading to effective early detection of political ads and verifying disclaimers that may otherwise go undetected by automated systems.

7. Raise Awareness: A digital marketing expert interviewed, suggested more investment in capacity development initiatives for digital advertisers in Bangladesh, as inadequate transparency often stems from a lack of policy awareness (Interviewee #03). These programs should prioritize educating advertisers on political ad regulations, transparency procedures and ethical standards, with a particular emphasis on combating misinformation and hate speech.

8. Collaborate and Engage: The government of Bangladesh has the opportunity to foster a collaborative model involving multiple stakeholders, such as academics, researchers, and civil society. Engaging in processes like “red teaming,” where these stakeholders evaluate the effectiveness of platforms’ policies, can provide valuable insights and contribute to a more robust monitoring system for online political ads, recommended an informant (Interviewee #02).



CONCLUSION

The systems of social media platforms are so robust and complex that it is very hard for researchers and civil society to get into the intricacies of the problems they create. This study only attempts to identify trends in false or no detections of political ads on Meta platforms and highlights the need for improved transparency. However, it raises more questions than answers and hardly grasps the impact of inadequate transparency and weak enforcement of ad policies on the political process and society. Nonetheless, it would be immensely rewarding if this study contributed to existing knowledge and informed the perspectives and decisions of relevant stakeholders, particularly social media platforms. As 40 countries worldwide are holding national elections in 2024, the imperative for heightened political ads transparency becomes even more apparent (Curran and Crawford,

2023). Social media platforms must acknowledge their pivotal role in shaping political discourse and invest in improving the enforcement of their advertising policies. As echoed by an expert interviewee, "Allowing a system that permits virtually unlimited spending on political advertisements without transparency regarding the funding of individuals or groups poses a significant threat to democracies worldwide" (Interviewee #02).

- Advertising Policies Help. 2023 'Political content.' <https://support.google.com/adspolicy/answer/6014595?hl=en> (accessed on November 29, 2023).
- Bangladesh Awami League. 2023. 'Awami League plans big social media campaign for upcoming election.' October 15. <https://albd.org/articles/news/41092/Awami-League-plans-big-social-media-campaign-for-upcoming-election> (accessed on November 29, 2023).
- Bhattacharjee, Partha Pratim and Ashik Abdullah Apu. 2023a. 'AL plans big social media campaign.' October 15, *The Daily Star*. <https://www.thedailystar.net/news/bangladesh/politics/news/al-plans-big-social-media-campaign-3443521> (accessed on November 29, 2023).
- 2023b. 'Counter anti-govt propaganda on social media.' September 7, *The Daily Star*. <https://www.thedailystar.net/news/bangladesh/news/counter-anti-govt-propaganda-social-media-3412716> (accessed on November 29, 2023).
- Bhattacharya, Snigdhendru. 2023. 'Won't join farcical vote': Bangladesh opposition leader ahead of election.' November 29, *Aljazeera*. <https://www.aljazeera.com/news/2023/11/29/wont-join-farcical-vote-bangladesh-opposition-leader-ahead-of-election> (accessed on November 29, 2023).
- Chowdhury, Zia and Joynal Abedin Shishir. 2023. 'New reality of BNP flash processions: Gather, take photos, and wrap up in two mins.' November 20, *The Business Standard*. <https://www.tbsnews.net/bangladesh/new-reality-bnp-rallies-gather-take-photos-and-wrap-two-mins-742958> (accessed on November 29, 2023).
- CIVICUS. 2023. 'Shrinking civic space in Bangladesh, the Philippines and India continues unabated.' Statement at the 54th Session of the UN Human Rights Council, September 27. <https://www.civicus.org/index.php/media-resources/news/united-nations/geneva/6596-shrinking-civic-space-in-bangladesh-the-philippines-and-india-continues-unabated> (accessed on November 29, 2023).
- Clegg, Nick. 2023. 'New features and additional transparency measures as the Digital Services Act comes into effect.' August 22, *Meta*. <https://about.fb.com/news/2023/08/new-features-and-additional-transparency-measures-as-the-digital-services-act-comes-into-effect/> (accessed on November 30, 2023).
- Curran, Enda and Alan Crawford. 2023. 'In 2024, it's election year in 40 countries.' November 1, Bloomberg. <https://www.bloomberg.com/news/newsletters/2023-11-01/2024-is-election-year-in-40-countries-and-podcast-elon-inc-launches-next-week> (accessed on December 10, 2023)
- Edelson, Laura, Tobias Lauinger, and Damon McCoy. 2020. 'A security analysis of the Facebook Ad Library.' *IEEE Symposium on Security and Privacy (SP)*. <https://ieeexplore.ieee.org/document/9152626> (accessed on October 3, 2023).
- John F. Kennedy Library. 2004. 'The evolution of political advertising.' May 3. <https://www.jfklibrary.org/events-and-awards/kennedy-library-forums/past-forums/transcripts/the-evolution-of-political-advertising> (accessed on November 26, 2023).
- Hern, Alex. 2018. 'Cambridge analytica: How did it turn clicks into votes?.' May 6, *The Guardian*. <https://www.theguardian.com/news/2018/may/06/cambridge-analytica-how-turn-clicks-into-votes-christopher-wylie> (accessed on November 27, 2023).
- Islam, Muhammad Zahidul. 2018. 'Polls campaign enters digital era.' December 21, *The Daily Star*. <https://www.thedailystar.net/business/news/polls-campaign-enters-digital-era-1676731> (accessed on November 29, 2023).
- Islam, Zyma and Mohammad Jamil Khan. 2023. 'Spin doctors go into overdrive ahead of polls.' November 12, *The Daily Star*. <https://www.thedailystar.net/news/bangladesh/politics/news/spin-doctors-go-overdrive-ahead-polls-3467331> (accessed on November 27, 2023).
- Kaid, Lynda Lee (ed). 2004. *Handbook of Political Communication Research* (United States: Lawrence Erlbaum Associates, Publishers). <https://books.google.com.bd/books?id=2q-PAgAAQBAJ&lpg=PA155&ots=TpWbIHK1XV&dq=political%20advertisement%20%20democracy&lr&pg=PP1#v=onepage&q&f=false> (accessed on November 26, 2023).

- Kemp, Simon. 2023. 'Digital 2023: Bangladesh, data reportal.' February 13. <https://datareportal.com/reports/digital-2023-bangladesh> (accessed on November 29, 2023).
- Meta. 2023a. 'About social issues.' <https://www.facebook.com/business/help/214754279118974?id=288762101909005> (accessed on August 25, 2023).
- 2023b. 'Ads about social issues, elections or politics.' <https://transparency.fb.com/en-gb/policies/ad-standards/SIEP-advertising/SIEP/> (accessed on August 25, 2023).
- 2023c. 'Ad library.' <https://www.facebook.com/ads/library/> (accessed on August 22, 2023).
- 2023d. 'Choosing a special ad category.' <https://www.facebook.com/business/help/298000447747885> (accessed on August 26, 2023).
- 2023e. 'Get authorized to run ads about social issues, elections or politics.' <https://www.facebook.com/business/help/208949576550051?id=288762101909005> (accessed on August 23, 2023).
- 2023f. 'About the Meta ad library.' <https://www.facebook.com/business/help/2405092116183307?id=288762101909005> (accessed on August 27, 2023).
- 2023g. 'Availability for ads about social issues, elections or politics.' <https://www.facebook.com/business/help/2150157295276323?id=288762101909005> (accessed on November 30, 2023).
- 2023h. 'Ads about social issues and selling products or services.' <https://www.facebook.com/business/help/287622936276216> (accessed on November 30, 2023).
- 2023i. 'About Meta advertising standards.' <https://www.facebook.com/business/help/488043719226449?id=434838534925385> (accessed on December 9, 2023).
- News European Parliament. 2023. 'Why new EU rules for political advertising are important.' February 9. <https://www.europarl.europa.eu/news/en/headlines/society/20230202STO71504/why-new-eu-rules-for-political-advertising-are-important> (accessed on November 27, 2023).
- OSSGA. 2023. 'Social media in Bangladesh - 2023 stats & platform trends,' October 30. <https://oosga.com/social-media/bgbd/> (accessed on November 29, 2023).
- Pochat, Victor Le, Laura Edelson, Tom Van Goethem, Wouter Joosen, Damon McCoy, and Tobias Lauinger. 2022. 'An audit of Facebook's political ad policy enforcement.' 10 – 12 August, USENIX. <https://www.usenix.org/system/files/sec22-lepochat.pdf> (accessed on August 23, 2023).
- Rahman, Asifur. 2023. 'Polls campaign: Candidate can't spend more than Tk 25 lakh.' November 17, *The Daily Star*. <https://www.thedailystar.net/news/bangladesh/elections/news/polls-campaign-candidate-cant-spend-more-tk-25-lakh-3471636> (accessed on November 30, 2023).
- Rahman, Mahin M. 2018. 'Campaigning for parliamentary election legally.' December 20, *The Daily Star*. <https://www.thedailystar.net/law-our-rights/news/campaigning-parliamentary-election-legally-1676443> (accessed on December 10, 2023).
- Silva, Márcio, Lucas Santos de Oliveira, Athanasios Andreou, Pedro Olmo Vaz de Melo, Oana Goga, Fabrício Benevenuto. 2020. 'Facebook ads monitor: An independent auditing system for political ads on Facebook.' arXiv:2001.10581 [cs.SI]. <https://doi.org/10.48550/arXiv.2001.10581> (accessed on August 23, 2023).
- Sosnovik, Vera, Romaiassa Kessi, Maximin Coavoux, Oana Goga. 2023. 'On detecting policy-related political ads: An exploratory analysis of Meta ads in 2022 French election.' *ACM Digital Library*. <https://dl.acm.org/doi/10.1145/3543507.3583875> (accessed on November 2, 2023).
- The Economist. 2020. 'A new mobile-money firm in Bangladesh is benefiting from special treatment.' March 5. <https://www.economist.com/asia/2020/03/05/a-new-mobile-money-firm-in-bangladesh-is-benefiting-from-special-treatment> (accessed on November 30, 2023).

The Guardian. 2023. 'Record \$15.9bn in US political ad spending expected for 2024.' December 8. <https://www.theguardian.com/us-news/2023/dec/08/2024-election-ad-spending-record> (accessed on November 27, 2023).

TikTok. 2023. 'TikTok's stance on political ads.' <https://www.tiktok.com/creators/creator-portal/en-us/community-guidelines-and-safety/tiktoks-stance-on-political-ads/> (accessed on November 29, 2023).

X Business. 2023. 'Political content.' <https://business.twitter.com/en/help/ads-policies/ads-content-policies/political-content.html#twtr-main> (accessed on November 29, 2023).

Zakaria, AKM. 2023. 'What's the 'cost' of the election as the government wants it?'. October 16, *Prothom Alo (English)*. <https://en.prothomalo.com/opinion/op-ed/i8pdj5s4zg> (accessed on November 29, 2023).

Annexure-1: Broad and Narrow Categories of Facebook Pages

In the following table, five categories of pages of this research have specifically been outlined. First, pages on Facebook that have indicated their political affiliation or declared as political during the category selection process are classified as 'Political' pages. Second, a wide range of news and media-related pages have been categorized as 'News and Media'. Third, pages that are involved in the online sale of goods, services, or products are classified as 'commercial'. Fourth, in addition to the three categories mentioned, this study's list of 355 pages includes 126 pages that have been categorized as 'Other' considering they do not belong to any specific larger category. This category includes various entities, such as government organizations, non-profit organizations, communities, digital creators, personal blogs, and more. Last, there is another category this study named as 'unavailable' to include pages that, when opened, notify that the 'page has been unpublished or deleted', or that 'the content is currently unavailable'.

SL	Broad Category	Total Count	Narrow Category	Total Count
1	Political	72	Politician	53
			Political Candidate	03
			Political Organization	09
			Political Party	07
2	News and Media	92	News and Media Website	42
			Media/News Company	26
			Newspaper	14
			Journalist	04
			News Personality	02
			Media	01
			Media Agency	01
3	Commercial	56	Broadcasting and Media Production Company	01
			Bookstore	12
			Publisher	06
			Apparel and clothing	06
			Financial service	03
			Shopping service	03
			Software	03
			Business service	03
			Consulting agency	02
			Graphic Designer	02
			Travel agency	01
			Advertising Agency	01
			Architectural Designer	01
			Book & Magazine Distributor	01
			Chemical Company	01
			Construction Company	01
			E-commerce website	01
			Electronics Company	01
			Industrial company	01
			Internet Marketing Service	01
Local business	01			
Marriage Therapist	01			
Organic Grocery Store	01			
Toy Store	01			
Wholesale & Supply Store	01			

4	Other	126	Public Figure	19
			Non-profit Organization	18
			Community	15
			Interest	11
			Government Official and Organization	08
			Digital Creator	05
			Social Service	05
			Personal Blog	05
			College and University	04
			Cause	04
			Sports	03
			Entertainment Website	02
			Religious Organization	02
			Entrepreneur	02
			Education	02
			Arts and Humanities Website	02
			Actor	01
			Animals & Pets	01
			App Page	01
			Armed Forces	01
			Community Center	01
			Community Organisation	01
			Consulate and Embassy	01
			Educational Consultant	01
			Esports Team	01
			Event	01
Fan Page	01			
Media Critic	01			
Medical and Health	01			
Nursing School	01			
Party Entertainment Service	01			
Personal Coach	01			
Public and Government Service	01			
RV Park	01			
Youth Organization	01			
5	Unavailable	09	-	-
Total:		355		

Annexure-2: Keywords

The list of keywords that we have used include: শেখ হাসিনা (Sheikh Hasina), খালেদা জিয়া (Khaleda Zia), সজীব ওয়াজেদ (Sajeeb Wazed), তারেক রহমান (Tarique Rahman), আওয়ামী লীগ (Awami League/AL), বিএনপি/BNP (Bangladesh Nationalist Party), জাতীয় পার্টি (Jatiya Party), জামায়াতে ইসলামী (Jamaate-e-Islami), বাংলাদেশ ছাত্রলীগ (Bangladesh Chatra League), বাংলাদেশ ছাত্রদল (Bangladesh Jatiotabadi Chatra Dal), বাংলাদেশ ছাত্রশিবির (Bangladesh Islami Chhatrashibir), বাংলাদেশ যুবলীগ (Bangladesh Awami Jubo League), বাংলাদেশ যুবদল (Bangladesh Jatiotabadi Jubo Dal), বাংলাদেশ ইসলামী আন্দোলন (Islamic Movement Bangladesh), বাংলাদেশ ইসলামী ছাত্র আন্দোলন (Islamic Student Movement Bangladesh), বাংলাদেশ গণ অধিকার পরিষদ (Bangladesh Gono Odhikar Porishod/Bangladesh People's Rights Council), দেশনেত্রী (National Leader), জননেত্রী (People's Leader), নির্বাচন (Election - Bangladesh), জনসভা (Public Meeting), সমাবেশ (Assembly - Bangladesh), নেতাকর্মী (Activists), ব্যালট (Ballot), ভোট (Vote), স্মার্ট বাংলাদেশ (Smart Bangladesh), ডিজিটাল বাংলাদেশ (Digital Bangladesh), আন্দোলন (rally - Bangladesh), #TakeBackBangladesh, #StepDownHasina, and #OnceAgainHasina.

Please note that this study has used the Bengali keywords, except for the last three hashtag campaigns.

This research has underscored the keywords that are mostly connected to political figures, political parties, and political personalities, and the terms or words which are rarely used outside of political contexts or commentary in Bangladesh. For example, four names, such as "Sheikh Hasina" is the name of the current Prime Minister in the Government of Bangladesh, "Khaleda Zia" is the name of chairperson and leader of the Bangladesh Nationalist Party (BNP) since 1984, Sajeeb Wazed is the name of son of Sheikh Hasina, Tarique Rahman is the name of son of Khaleda Zia and acting chairman of BNP since February 2018, have been used as keywords involving political figures.

Then, there are 12 political parties and organizations that are active and relevant in the current political situation of Bangladesh: Awami League, BNP, Jatiya Party, Jamaat-e-Islami, Bangladesh Chhatra League, Bangladesh Jatiotabadi Chatra Dal, Bangladesh Islami Chhatrashibir, Bangladesh Awami Jubo League, Bangladesh Jatiotabadi Jubo Dal, Islamic Movement Bangladesh, Islamic Student Movement Bangladesh, and Bangladesh People's Rights Council.

A further 11 keywords, selected outside of political figures and parties, are frequently used in political campaigns, speeches and commentary in Bangladesh: national leader, people's leader, election, public meeting, assembly, activists, ballot, vote, Smart Bangladesh, Digital Bangladesh, rally. The last keywords associated with English hashtags were selected because they have been widely used recently in political campaigns: #TakeBackBangladesh, #StepDownHasina, #OnceAgainHasina.

Annexure-3: Semi-structured Interview Questions

1. Could you please briefly share findings of your research/work about Facebook's Political Ads?
2. Could you please explain why Meta's AI-powered or human moderation mechanisms fail to enforce political ads effectively?
3. In your opinion, what kinds of measures would help improve political ad policies' enforcement by Meta?
4. Why are both the issues of over-enforcement and under-enforcement important when considering Meta's political ads transparency?
5. What recommendations do you have for enhancing transparency of advertisers of political ads on Facebook?
6. The data on political ads in Bangladesh raises the question of whether Facebook should publish a list of 'social issues' for Bangladesh to increase transparency. What are your thoughts about it?
7. What would be your thoughts about enforcement of political ads-related policies in other platforms, such as YouTube and TikTok?
8. Is there anything else you want to say about Facebook's political ads policy enforcement?

Annexure-4: Content Assessment Tool

The volunteers of this research relied on Meta's political ad-related guidelines as a tool to assess whether the contents of Facebook ads were political or non-political (Meta, 2023b). Meta has categorized an ad as political when that:

- Is made by, on behalf of or about a candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office;
- Is about any election, referendum or ballot initiative, including "get out the vote" or election information campaigns;
- Is about any social issue in any place where the ad is being run; or
- Is regulated as political advertising.

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