

**APPLICATION FOR CATEGORY 1, 2, & 3
SPORTS WAGERING OPERATOR LICENSE**



APPLICANT NAME: _____

Applicant: _____

INSTRUCTIONS

When using this application please use the tab on the side to attach all sections requiring submissions. Each attachment should be named for its corresponding section (see (c) under Electronic Application for greater detail). Please make sure to fill out all sections where prompted. If a field does not apply please place N/A. The application must be filled out in its entirety to be accepted by the Massachusetts Gaming Commission.

Applicant: _____

General Information

This *Application For Category 1, 2, & 3 Sports Wagering Operator License* form (the form itself “Application Form”, and along with all attachments “application”) was designed by the Massachusetts Gaming Commission (“Commission”) as a vehicle for each applicant to demonstrate that it has thought broadly and creatively about creating a sports wagering operation in Massachusetts that will provide a significant and lasting benefit to the Commonwealth of Massachusetts and will deliver an overall experience that both offers an exceptional sports wagering experience and includes significant responsible gaming and consumer protection measures.

The application must be completed in accordance with these instructions. In accordance, any discrepancies may be taken into consideration by the Commission when evaluating the application.

To the extent that an applicant is a newly formed entity or to date has been a largely non-operational entity, any information required to be provided relative to past performance or general practice shall, at a minimum, be provided in relation to the primary controlling and/or operating entity of the proposed sports wagering operator and/or its significant business units.

If an applicant is unable to comply with or respond to any part of the application, it may apply for a waiver or variance from the Commission in accordance with **205 CMR 102.03(4) {update reg info when available}** in advance of the filing deadline.

All communications, including general questions and application inquiries, should be directed to the Executive Director or Commission staff.

How to submit a general question and/or application inquiry:

1. Please go to: <https://massgaming.com/about/sports-wagering-in-massachusetts/applications-for-sports-wagering-licenses/>
2. Select “Inquiry Regarding Sports Wagering Application” from the Reason for Submitting Form drop down menu
3. Complete all of the required fields
4. Click “Submit.”

A Commission representative will respond to each inquiry in a timely manner. ***At no time during the application process should any applicant, agent of the applicant, qualifier, or another associated individual contact or attempt to contact a Commissioner directly.***

This Application Form does not constitute an offer of any nature or kind to any applicant or its agents. The Commission is under no obligation to issue a license to any of the applicants. By submitting an Application, the applicant is deemed to agree to all of the terms of this process.

To the extent that anything contained in this application is inconsistent with any other guidance or policy-related document issued by the Commission in the past, this application shall control. To the extent that anything contained in this application is inconsistent with any provision of 205 CMR or G.L. c.23N, the governing law shall control.

Terms used in the application shall be given their most logical, plain meaning in the context of the application. The Commission reserves the right to amend or clarify this application at any time prior to the deadline for the submission of applications.

For each Application, all of the Commission’s costs and expenses of the administrative proceedings pursuant shall be borne by the applicant. All such costs and expenses shall be assessed to the applicant and collected by the Commission.

Applicant: _____

The Commission will utilize its website, www.massgaming.com, to provide notices of hearings, a notice of amendment or clarification of the Application Form, general updates, and general information relative to the application process.

Please be advised that any portion of this Application Form and any associated requests for information or documents may be changed at any time.

Applicant: _____

Non-Refundable Processing Fee

Pursuant to G.L. c. 23N, § 7(a), an applicant for an operator license shall pay to the commission a nonrefundable processing fee of \$200,000 for the costs associated with the processing of the application and investigation of the applicant; provided, however, if the costs of the investigation exceed the initial application fee, the applicant shall pay the additional amount to the commission not more than 30 days after notification of insufficient fees or the application shall be rejected.

Applicants may pay the \$200,000.00 processing fee via wire transfer, certified check, or cashier's check. Wiring information may be obtained by contacting:

Douglas O'Donnell
Revenue Manager
(617) 979-8425

Checks must be made out to the Massachusetts Gaming Commission and mailed to:

Massachusetts Gaming Commission
c/o Revenue Division
101 Federal Street, 12th Floor
Boston, MA 02110

Applicant: _____

Completing the Application

The application is divided into seven primary sections, each section containing questions relating to that section. The applicant should answer each question fully. While a cross-reference to other sections within the application may be included as part of an answer to a particular question, a cross-reference may not serve as the entire answer to any particular question. Please make sure to include the name of the applicant in the provided space at the top of the page for each question. If the answering of any question requires an attachment, please see below.

Format: Answers to questions should be formatted in the “Times New Roman” font, with a font size of 12.

Attachments: Where an applicant may wish to attach a document in response or to supplement its written response, or another exhibit of any nature, it may attach such documents and/or exhibits as set forth in the instructions for “[Electronic Application Format](#).” All attachments must be named and listed for the corresponding question. If the same attachment is responsive to multiple questions within the application, a copy of the attachment should be attached to each question, not just cross-referenced.

Every question must be answered completely. If a question or portion thereof is not applicable, enter “N/A” into the appropriate space on the application.

Applicants for Category 1 Sports Wagering Licenses and Category 2 Sports Wagering Licenses may refer the Bureau and Commission to prior application forms submitted to the Commission by the Applicant or previous information otherwise obtained by the Bureau or Commission regarding the Applicant.

Applicant: _____

Submission of Materials

The Application must be submitted by the application deadline. The deadline for **all applications (Category 1, 2 & 3) is Monday, November 21, 2022, at 2 p.m.** The Commission shall have no obligation to accept or review an application submitted after the established deadline.

How to Submit an MGC Sports Wagering Operator License Application

Entities interested in applying for a Sports Wagering Operators License must request a link to the MGC Secure File Transfer Site prior to submitting their application form and any additional documents. This link will allow for the secure and confidential upload and storage of all application materials.

How to Request a Link to the MGC Secure File Transfer Site:

Please Note: All link requests must be received no later than one week before the application deadline (November 14, 2022).

1. Please go to: <https://massgaming.com/about/sports-wagering-in-massachusetts/applications-for-sports-wagering-licenses/>
2. Select “Request Secure Link to Submit Completed Sports Wagering Application” from the Reason for Submitting Form drop down menu
3. Complete all of the required fields
4. Click “Submit.”

A Commission representative will provide the requested link and additional instructions on uploading the application materials securely via email. The information will be sent in two emails, with the link being in the first email and the password sent separately in the second email, for security purposes.

Applicant: _____

Electronic Application Format

When the electronic version of the application materials is submitted via the MGC Secure File Transfer Site and uploaded to the Commission's server, the applicant must abide by the following:

- (a) The applicant must submit this original completed Application Form that has not been printed, signed, and scanned, but with all answers electronically filled in, all attachments identified, and all necessary boxes checked. This version is being required so that it may be searched electronically by the Commission during the evaluation process. This document must be in PDF format.
- (b) The applicant must also submit this completed Application Form with all answers electronically filled in, all attachments identified, all necessary boxes checked, and all required signatures affixed. This version is identical to the document described in (a) above, but it should also be printed, signed, and scanned. This scanned document must be in PDF format.
- (c) The applicant must submit each attachment as its own electronic file. No electronic file should contain more than one document. Each attachment should be in PDF format unless otherwise required. The file names of all of the attachments must be named strictly in accordance with the following rules:
 - The first portion of the filename must contain the section number and subsection of the question followed by a hyphen, then and the attachment number for that particular question with a leading zero for numbers under 10 (e.g. "B1-b-##").
 - The file name should then contain the descriptive name of the attachment, in at most 20 characters.
 - The name of the attachment must not contain the name of the applicant.
 - The final portion of the filename should be the extension, such as ".pdf" or ".xls".
 - The file name should correspond to the list of attachments on the Application Form.
 - If the Applicant believes the attachment to be confidential, in whole or in part (i.e.- exempt from disclosure under the Public Records Law), then the filename must have the word "CONFIDENTIAL" in all capital letters placed directly before the file extension. Failure to include this label may result in the public release of the document.

Although a PDF version of each attachment is required, in certain cases providing an alternative file format may be helpful to the Commission in reaching its decision. For example, where the applicant is required to submit tables of calculations, such as a revenue projection, it should be submitted in spreadsheet format so that the Commission may numerically analyze this information. The applicant may also, although not required, provide other documents such as videos, interactive documents, or physical models. These types of documents do not readily lend themselves to conversion into PDF format. For these documents, the applicant should provide both the document in original format, and a PDF file describing the existence of such a document within the applicant's application materials. The file name of the alternate format, if it is in fact a computer-readable file, and the filename of the PDF format of the attachment should be identical, excluding the file extension.

No electronically submitted document to the Commission may be password protected. The individual documents should not be encrypted separately.

Any attachments containing a table of calculations, such as a revenue projection, should be included in the electronic submission in a spreadsheet format, preferably Microsoft Excel ".xls" files.

Applicant: _____

The following is an example of select files of a properly organized application:

B2-a-01 Additional Sports Wagering Licensure Information.pdf

B2-a-02 Additional Sports Wagering Jurisdiction Information.pdf

C2-a-01 Revenue Projections CONFIDENTIAL.pdf

C2-b-01 Revenue Projections CONFIDENTIAL.xls

Application.pdf

Signed Application.pdf

Applicant: _____

Public Records

Pursuant to G.L. c. 23N, §6(i), “[a]pplications for operator licenses shall be public records” Applicants should be mindful of this prior to submission of an Application. However, the law also provides “that trade secrets, competitively-sensitive or other proprietary information provided in the course of an application for an operator license under [chapter 23N], the disclosure of which would place the applicant at a competitive disadvantage, may be withheld from disclosure under [the Massachusetts public records law].”

To help inform applicants of the Commission’s intentions, a guide has been attached at the end of the Application advising which answers and attachments submitted with this form will be considered to presumptively meet the exception to the public records law and withheld from public disclosure. There is also space for an applicant to request exempt treatment of a specific document identified in the Application. **FAILURE TO FOLLOW THE INSTRUCTIONS PROVIDED IN THE GUIDE MAY RESULT IN PUBLIC RELEASE OF THE DOCUMENTS.**

Please note, though the Commission will use its best efforts to protect any information it deems subject to an exemption, final appeals are adjudicated by the [Secretary of the Commonwealth](#) in accordance with G.L. c.66, §10.

Applicant: _____

Checklist

Complete this checklist prior to submitting any materials to the Commission.

- The applicant has answered all of the questions in this Application Form that it was required to respond to
- Any question requiring an attachment has the attachment noted on the Application Form
- The applicant properly named all the files
- The applicant has properly organized all of the attachments
- No files have been password protected
- The applicant has signed all required pages of this application
- The applicant has paid the \$200,000.00 non-refundable processing fee
- The applicant will update the Commission if there are any changes to the information presented in the Application or any of the attachments.

Applicant: _____

SECTION A: GENERAL INFORMATION

A.1 APPLICANT NAME

Name

A.2 CATEGORY OF LICENSE APPLYING FOR (check one)

- Category 1** (In-Person Wagering at a Gaming Establishment)
 Category 2 (In-Person Wagering at a Live Horse Racing or Simulcasting Facility)
 Category 3 (Mobile Sports Wagering)

A.3 IF APPLYING FOR CATEGORY 3 (MOBILE SPORTS WAGERING) LICENSE, IS THIS APPLICATION TETHERED TO A CATEGORY 1 OR CATEGORY 2 APPLICATION (check one)

- No** (*Independent Application*)
 Yes, Tethered to Category 1 or Category 2 Applicant (*applicant name*):

A.4 STATE/COUNTRY IN WHICH THE BUSINESS ENTITY IS INCORPORATED, ORGANIZED, FORMED, OR REGISTERED

State/Province

Country

A.5 IDENTIFY THE APPLICANT'S TYPE OF BUSINESS (check one)

- Limited Liability Company** **Partnership** **Other** (*please describe*):
 C-Corporation **Limited Partnership** _____
 S-Corporation **Trust**
 Sole Proprietorship

A.7 FEDERAL TAX ID NUMBER

Federal Tax ID Number

A.6 APPLICANT LOCATION INFORMATION

Number and Street Address

City, State, & Zip Code

Phone Number

Email Address

Website

A.7 APPLICANT PRINCIPAL PLACE OF BUSINESS INFORMATION

Number and Street Address

Applicant: _____

City, State, & Zip Code

Phone Number

Email Address

A.7 PRIMARY CONTACT FOR THIS APPLICATION

Name

Title

Email Address

Phone Number

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

B.1 APPLICANT'S ABILITY TO OFFER SPORTS WAGERING IN THE COMMONWEALTH

Provide a thorough description of the applicant's ability to offer sports wagering in the Commonwealth. This should include the following:

- a. Background in sports wagering
- b. Experience and licensure in other jurisdictions with sports wagering
- c. Plans to offer the platform in coordination with other applicants or person
- d. Intention to limit participation in any allowable sports events

B.2 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING OPERATION
(Category 1 & 2 Applicants Only)

Provide a thorough description of the sports wagering operation proposed for the Commonwealth. This should include the following:

- a. Description of the customer experience, including options, promotions, and offers
- b. Overview of wagering activity
- c. Estimated volume of wagering activity (*annually*)
- d. Estimated market share within each jurisdiction

B.3 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING PLATFORM
(Category 3 Applicants Only)

Provide a thorough description of the sports wagering platform to be operated in the Commonwealth. This should include the following:

- a. Description of the customer experience, including options, promotions, and offers
- b. Overview of wagering activity
- c. Estimated volume of wagering activity (*annually*)
- d. Jurisdictions where the platform is currently licensed and operating
- e. Current integration in use with other wagering operators
- f. The number of user accounts maintained
- g. Estimated market share within each jurisdiction

B.4 SPORTS WAGERING EXPERTISE – TECHNICAL FEATURES & OPERATION OF PLATFORM
(Category 3 Applicants Only)

Provide a thorough description of the applicant's expertise in sports wagering and how it would be applicable in the Commonwealth. This should include the following:

Applicant: _____

- a. Overview of technical standards, features, and operation of the platform
- b. List of all current certifications or approvals from certified independent test labs and jurisdictions
- c. Plan for continuous support, maintenance, and change management of the platform
- d. Outline the features of the platform designed to support the customers
- e. Sample wagering menu the Applicant intends to offer, *pending approval from the Commission*
- f. Description of Applicant's proposed ability to commence mobile sports wagering on the platform
- g. How the Applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.
- h. Outline any technology to be used or features offered that the applicant believes sets their platform apart from those of (potential) other applicants

SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

- a. The number of current full-time and part-time employees within the Commonwealth
- b. The number of current work locations within the Commonwealth
- c. The number of proposed full-time and part-time positions that will be created within the Commonwealth
- d. The title, job description, salary, and benefits information for each of the proposed positions
- e. The training that will be required and made available for all proposed positions
- f. The number of proposed work locations that will be created within the Commonwealth
- g. Description of plans for workforce development opportunities for Applicant's staff within the Commonwealth
- h. Outline the strategy for focusing on job opportunities and training in areas and demographics with high unemployment and/or underemployment

C.2 PROJECTED REVENUE

Provide studies and projections for gross sports wagering revenue for each of the first five years of wagering operations on a best, average, and worst, case basis. The studies and information provided should include:

- a. Projected figures for sports wagering revenue and methodology used to arrive at these projections
- b. Projected figures for any non-sports wagering revenue and methodology used to arrive at these projections
- c. Projected figures for all tax revenue to the Commonwealth and methodology used to arrive at these projections
- d. Profitability of sports wagering operation (in-person & mobile) in other jurisdictions where the applicant is licensed
- e. History of operating performance versus revenue projections for the last five years for other jurisdictions where the platform is licensed – *includes documentation outlining the applicant's record of success or failure in meeting the performance objectives*
- f. Description of methods to ensure that revenues are maximized within the Commonwealth
- g. Description of plans to compete with other nearby jurisdictions and to market to Massachusetts patrons

C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

- a. A detailed timeline of construction
- b. Proposed location within the gaming establishment, including plans for the construction of a new section within the gaming floor and/or any potential additions to the facility
- c. Approximate square footage of the sports wagering area
- d. Secure location for storing funds issued by a cage, to be used in the operation, including all security measures and procedures

Applicant: _____

- e. Proposed security and surveillance of the sports wagering area and operation and how the applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.
- f. Reasonable measures the applicant will take to ensure the safety and security of all employees and patrons of any sports wagering related events
- g. Accessibility of patrons to the proposed sports wagering area, including all means of entry and exit, including handicapped access, and the volume of traffic that can be sustained
- h. Number and location(s) of ticket window(s)
- i. Number and location(s) of wagering kiosk(s)
- j. Location and display format for all wagers, available to the public
- k. Location of posting of house rules
- l. *If applicable* – description regarding any proposal of providing food, beverages, and other concessions to patrons

C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY (Category 2 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

- a. Location of proposed sports wagering operation (*address*)
- b. A detailed timeline of construction
- c. Proposed location of sports wagering area within the facility, including plans for the construction of a new section and/or any potential additions to the facility
- d. Approximate square footage of the sports wagering area
- e. Secure location for storing funds issued by a cage, to be used in the operation, including all security measures and procedures
- f. Proposed security and surveillance of the sports wagering area and operation and how the applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.
- g. Reasonable measures the applicant will take to ensure the safety and security of all employees and patrons of any sports wagering-related events
- h. Accessibility of patrons to the proposed sports wagering area, including all means of entry and exit, including handicapped access, and the volume of traffic that can be sustained
- i. Number and location(s) of ticket window(s)
- j. Number and location(s) of wagering kiosk(s)
- k. Location and display format for all wagers, available to the public
- l. Location of posting of house rules
- m. *If applicable* – description regarding any proposal of providing food, beverages, and other concessions to patrons

Capital Investment

In accordance with G.L. c.23N, §3, Category 2 licensees shall make a capital investment of not less than \$7,500,000.00 within 3 years after receiving a sports wagering license, which the applicant must agree to expend.

Please provide a thorough description, including the following:

- n. How the applicant proposes to realize the required capital investment
- o. The financial commitments and guarantees the applicant is prepared to provide the Commission
- p. How the applicant will ensure that the project is completed, the license conditions are fulfilled, and sufficient working capital is available to allow operation in the promised fashion
- q. Any mitigation measures the applicant will take to reduce any impact on the local community

C.5 COMMUNITY ENGAGEMENT

Provide a thorough description of how the Applicant will contribute to economic & business development, tourism & community relations, and the promotion of charitable causes in the Commonwealth. Including:

Applicant: _____

- a. Creating partnerships for any community, economic development, and tourism opportunities with local or regional entities including but not limited to the Massachusetts Office of Business Development, Chambers of Commerce, Regional Tourism Councils, and the Massachusetts Marketing Partnership
- b. Plans, measures, and steps the applicant intends to take to avoid any negative impact on the revenues currently generated by the Massachusetts State Lottery, including cross-marketing strategies and increasing ticket sales
- c. Promoting local businesses, including restaurants, hotels, and retail outlets
- d. Cross-marketing with live entertainment venues and/or attractions
- e. Supporting any community enhancements being incorporated at the local level
- f. Highlighting unique business and marketing strategies to draw new revenues from new customers

SECTION D: DIVERSITY, EQUITY, & INCLUSION

D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

Provide a thorough description of the applicant's willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

- a. Applicant's current diversity, equity, and inclusion team – *please include the name and title of those individuals currently identified as part of the diversity, equity, and inclusion staff/team, as well as a copy of their location on the applicant's organizational chart*
- b. Applicant's workforce diversity, equity, and inclusion policy
- c. Workforce demographics, demonstrating the applicant's current workforce diversity
- d. Efforts to be made to cultivate workforce diversity, equity, and inclusion by identifying, recruiting, and hiring minorities, women, persons with disabilities, and veterans
- e. Memberships and/or intentions for joining any local, regional, state, and/or national organizations committed to the development and promotion of diversity, equity, and inclusion initiatives

D.2 DIVERSITY, EQUITY, & INCLUSION - SUPPLIER SPEND

Provide a thorough description of the Applicant's overall and specific goals, applicable to the total dollar amount of contracts, for the utilization of:

- a. Minority-owned business enterprises
- b. Women-owned business enterprises
- c. Veteran-owned business enterprises

Please include how each of these enterprise groups will participate as:

- Contractors in the design and/or building of the sports wagering platform
- Vendors in the execution, maintenance, and/or support of the sports wagering platform
- Vendors in the provision of goods and services

D.3 DIVERSITY, EQUITY, & INCLUSION – CORPORATE STRUCTURE

Provide a thorough description of the Applicant's commitment to diversity, equity, and inclusion initiatives in the Commonwealth. This should include:

- a. The makeup of the Applicant's ownership, leadership, and governance structure, – *including minorities, women, and veterans in positions of leadership throughout the corporate structure*
- a. How the Applicant intends to create joint ventures with corporate partners and/or partnerships with local or regional entities, including but not limited to programs, non-profit organizations, and agencies, dedicated to establishing a welcoming and inclusive experience for all patrons, users, and employees in the Commonwealth

SECTION E: RESPONSIBLE GAMING**E.1 RESPONSIBLE GAMING POLICIES**

Referencing the following documents:

- [MGC Responsible Gaming Framework](#)
- [Applying Principles of the Massachusetts Responsible Gaming Framework to Sports Wagering Policy & Practice](#)
- [GameSense Logic Model](#)
- [Responsible Gaming Considerations for Gambling Advertising](#)

Provide a proposed responsible gaming plan draft that, at a minimum, incorporates policies and tactics for the following key strategies:

- a. Commitment to corporate social responsibility
- b. Support positive play
- c. Promote public health and safety
- d. Ensure responsible advertising and marketing
- e. Manage high-risk financial transactions
- f. Engage the community
- g. Commitment to improvement and reporting

E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant's ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

- a. Estimated marketing budget in the Commonwealth
- b. Promotion and player loyalty programs
- c. Advertising plans – *must include information for any third-party marketing firm applicant plans to partner with for advertising in the Commonwealth*
- d. Measures to ensure that marketing reaches the target audience and not underage or vulnerable populations
- e. Player acquisition models – *specify minimum age to participate*
- f. Plans to incorporate responsible gaming and problem gambling information
- g. Strategies for converting those customers wagering via unlicensed or illegal means to wagering legally in the Commonwealth
- h. Examples of marketing, advertising, and promotional materials/activities recently used in other jurisdictions

E.3 HISTORY OF DEMONSTRATED COMMITMENT

Provide a thorough description of the policies and procedures that the applicant has adopted to:

- a. Promote responsible gaming within the gaming establishment or mobile application and in the community
- b. Assist patrons and users that are experiencing gambling-related harm
- c. Cooperate and support any government or regulatory agencies to promote responsible gaming and/or mitigate gambling-related harm
- d. List any membership or partnership with an agency or organization whose mission is in whole, or part, dedicated to responsible gaming or problem gambling
- e. List any awards or recognition the applicant has received, related to efforts to promote responsible gaming, or mitigating gambling-related harms
- f. List any fines, violations, citations, and/or corrective action required by the applicant in response to insufficient or improper policies, procedures, operations, advertising/marketing, and/or any other business related to sports wagering or other gambling enterprises

SECTION F: TECHNOLOGY**F.1 GEOFENCING**

Applicant: _____

Provide a thorough description of how the applicant will ensure that authorized users placing online sports wagers on their platform are geographically located in the Commonwealth of Massachusetts. This information must include:

- a. Which geolocation system(s) will be utilized to reasonably detect the physical location of an authorized user attempting to place a wager on the platform
- b. How the system will:
 1. Accurately detect the physical location of an authorized user attempting to access or place a wager on the platform through accurate location data sources (Wi-Fi, GSM, GPS)
 2. Block or deny unauthorized attempts to access the platform, or place a wager, from outside of the Commonwealth
 3. Update the IP address and physical location if they change while the user is active on the platform
 4. Identify attempts to circumvent the requirement to be physically located in the Commonwealth
- c. How the applicant will log information received from the system
- d. How the applicant will report the information received from the system to the Commission

F.2 KNOW YOUR CUSTOMER

Provide a thorough description of how the Applicant will ensure the verification of information provided by users opening a new account on the platform.

1. Ensure the integrity of the user's account information
2. Ensure the integrity of a user's device if it indicates tampering or suspicious activity
3. Notify the applicant of potential risks or fraudulent activity

F.3 TECHNOLOGICAL EXPERTISE AND RELIABILITY

Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

- a. Wager acceptance
- b. Systems for monitoring structured wagers, real-time data feed, and any unusual or suspicious wagering activity
- c. Description, location, and periodic testing of servers
- d. Security of servers, applications, and communications networks
- e. Security of patron personal and wagering information
- f. Integrity monitoring and reporting, including any current affiliations related to integrity monitoring

SECTION G: SUITABILITY

G.1 SUITABILITY – CORPORATE INTEGRITY

Applicants must also complete and submit the following documents, before any suitability investigations or background checks will commence:

- [Massachusetts Gaming Commission Business Entity Disclosure Form](#)
- a. Joint Venture Agreements for the implementation of a sports wagering operation:
 1. Other Applicants
 2. Businesses
 3. Contractors
 4. Vendors

G.2 SUITABILITY - INDIVIDUAL QUALIFIER INTEGRITY

Any Key Persons or Employees associated with an applicant must also complete and submit the following documents, before any suitability investigations or background checks will commence:

- [Massachusetts Gaming Commission Multi-Jurisdictional Personal History Disclosure Form](#)

- [Massachusetts Gaming Commission Supplemental Form](#)

G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- b.** Documentation demonstrating the financing structure and plan for the proposal, including all sources of capital. *Please include current capital commitments, as well as plan and timing for meeting future capital needs*
- c.** A detailed budget of the proposal cost, including any construction, design, legal and professional, consulting, and all other developmental fees. *Also identify all other pre-launch costs, including training, marketing, and initial startup capital*
- d.** An analysis, including best, worst, and average case scenarios, that demonstrates the applicant's plan and capacity for accommodating steep downturns in revenues, and provides examples of those plans and strategies that have been successful in other jurisdictions
- e.** What are the Applicant's annual liquidity, leverage, and profitability ratios, including current ratio, debt-to-equity ratio, and gross/net margin ratios?
- f.** Information pertaining to contracts, loan agreements, and/or commitments that the applicant has breached or defaulted on during the last ten years. *Provide information for any lawsuit, administrative proceeding, or another proceeding that occurred as a result of the breach or default*
- g.** A description of any administrative or judicial proceeding, during the last ten years, in which the applicant or any entity that owns 5%, or greater share, was found to have violated a statute or regulation governing its operation
- h.** Any bankruptcy filings made, or proceedings commenced, for any entities owned or controlled by the applicant and any entity owning a 5% or greater share of the applicant
- i.** Any financing amounts or ownership interests that are anticipated to come from minorities, women, and/or disadvantaged businesses. *If the applicant, or any portion of the applicant, is a public company, it is not necessary to list shareholders*
- j.** Examples and/or narratives that substantiate the applicant's understanding of and experience with Internal Controls.

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- a.** Been employed by the Massachusetts Gaming Commission
- b.** Possessed a gaming license (casino, video gaming, charitable games, lottery, pari-mutuel, sports wagering, etc.) issued by any jurisdiction – *if so, please provide a copy of each license*
- c.** Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth
- d.** Withdrawn a gaming license application, in any jurisdiction – *if so, please submit a detailed description of each withdrawal*
- e.** Been denied a gaming-related license or finding of suitability, in any jurisdiction – *if so, submit a detailed statement describing the denial and/or related findings*
- f.** Had a gaming license suspended, in any jurisdiction – *if so, include a detailed statement regarding each suspension*
- g.** Had a gaming license revoked, in any jurisdiction, or has had disciplinary action initiated to revoke a license – *if so, submit a detailed description of each revocation or action initiated*
- h.** Had a gaming license non-renewed or considered for non-renewal, in any jurisdiction – *if so, provide a detailed description of the circumstances*
- i.** Been found unsuitable gaming license non-renewed or considered for non-renewal, in any jurisdiction – *if so, provide a detailed description of the circumstances*

Applicant: _____

SIGNATURE FORMS

Applicant: _____

VERIFICATION AND AUTHENTICATION

The applicant, _____, hereby authorizes the Commission, the Executive Director of the Commission, the Investigations and Enforcement Bureau, and/or their respective designees to take all necessary and reasonable steps to verify and authenticate any information or materials submitted in conjunction with this application and agrees to fully cooperate in such an inquiry. Further, the applicant is aware that if any of the responses to any question in this application are determined to be false, or if they are misleading, the application may be denied. The applicant acknowledges its continuing duty to provide updated information and/or promptly notify the Commission of any changes to the information or materials, of which it becomes aware or should be aware, that were provided in response to any question in this application.

Name of Authorized Individual

Signature of Authorized Individual

Position with Applicant

Date

Applicant: _____

ATTESTATION

I, _____, on behalf of _____ hereby swear or affirm under the pains and penalties of perjury that the information contained in this Application form and all materials accompanying said form are true and accurate to the best of my knowledge and understanding; that I have reviewed the information contained in the Application form for accuracy; that I read and understand the questions and responses on the Application form; that any document accompanying this Application that is not an original document is a true copy of the original document; that I have read and understood all applicable provisions of 205 CMR and G.L. c.23N; that the applicant agrees to all terms, conditions, and obligations made applicable to all applicants for a sports wagering operator license; that in the event that the applicant is awarded an operator license it agrees to all obligations, terms, and conditions imposed upon a successful applicant; and that I am authorized to submit this application on behalf of the applicant.

Name of Authorized Individual

Signature of Authorized Individual

Position with Applicant

Date

Applicant: _____

WAIVER OF LIABILITY

_____ hereby holds the Commonwealth of Massachusetts and its instrumentalities and agents, including but not limited to the Massachusetts Gaming Commission and its agents, representatives and employees harmless, both individually and collectively, from any and all claims of liability for damages of whatever kind, resulting at any time from any disclosure or publication of information acquired during the application process or the use of any information provided in furtherance of this application.

Name of Authorized Individual

Signature of Authorized Individual

Position with Applicant

Date

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

B.3 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING PLATFORM

B3-f-01 - The number of user accounts maintained CONFIDENTIAL



As noted earlier, Super Group currently has over 2.6 million monthly unique active customers.

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

B.3 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING PLATFORM

B3-g-01 - Estimated market share within each jurisdiction CONFIDENTIAL

Listed below are the estimated DGC market share percentages for 2024.

The first five states in which DGC has taken the Betway brand live in the USA, being Colorado, Indiana, Pennsylvania, New Jersey, and Iowa, have not yet been migrated onto the Betway Global Sportsbook (the best-in-class technology used by Betway in our other non-African markets), and remain reliant on third-party technology. The Betway Global Sportsbook is scheduled to be rolled out across all currently live states in the next 12 months, and all future states to come (including Massachusetts if this proposal is successful).

The Betway Global Sportsbook product utilizes our proprietary data and analytics engine, which provides us with a holistic view of our customers. Through data-modelling and real-time events processing, this enables us to make the right decisions, at the right time, in the right market. As a business focused on our customers and the unique value proposition we offer them, using data to drive a highly personalized and customized entertainment offering is key to our ongoing engagement with our customers. Migrating from third-party technology to the Betway Global Sportsbook will have a substantial impact on DGC's ability to acquire and retain customers in the five initial states, thus favorably impacting market shares.

Prior to rolling out the Betway Global Sportsbook, we have been conservative with our marketing investment in the five initial states. We will significantly increase our marketing investment once the Betway Global Sportsbook is rolled out, as the product will ensure all customers enjoy world-class entertainment in a safe and secure environment.

Given the evolving nature of our business, we believe that showing estimated 2024 market share best represents DGC's initial prospects, based on conservative projections that factor in additional marketing spend and the comparatively better user experience with Betway Global Sportsbook. We are very confident in achieving the prudent market shares presented below by 2024, given our 20+ years of experience in successfully scaling our sports betting and gaming business in markets across the world.

State	2024 Estimated Market Share
Colorado	██████████
Indiana	██████████
Pennsylvania (sports betting only)	██████████
New Jersey (sports betting only)	██████████
Iowa	██████████
Arizona	██████████
Virginia	██████████

C2-d-01 – Profitability

ATTACHMENT 1

SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH **C.2 PROJECTED REVENUE**

C2-d-01 - Profitability of sports wagering operation (in-person & mobile) in other jurisdictions where the applicant is licensed

2021 ADUATED FINANCIAL STATEMENTS



DIGITAL GAMING CORPORATION

Digital Gaming Corporation USA

Consolidated Financial Statements

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D2-a-01 MINORITY OWNED BUSINESS

ATTACHMENT 1

SECTION E: RESPONSIBLE GAMING
E.2 ADVERTISING & PROMOTIONAL PLANS

E2-a-01 Estimated marketing budget in the Commonwealth

While DGC’s long-term expectation is that marketing will be between ██████████ of NGR, the focus is to initially upweight spend in the launch phase to ensure that adequate brand awareness and a solid customer base are built, to deliver against growth ambitions. This strategy, which has been tried and tested in many competitive regulated markets around the world, includes a larger marketing spend during the initial years after launch. This investment phase enables DGC to build a solid footing in any new market that it enters and follows the approach that Super Group takes around the world. The estimates outlined below are, if anything, on the conservative side and marketing spend in the initial years could be higher, depending how DGC sees the market playing out in its early stages. As a rough guide, DGC’s planned investment in media spend for the first three years is below:

TYPE OF SPEND	YEAR 1	YEAR 2	YEAR 3

It is worth highlighting that this marketing media budget is based solely on pure advertising media spend and does not take into account the below elements where DGC either leverages existing internal resource, or costs are shared across multiple states due to existing deals or partnerships. As in many other markets in which DGC operates, DGC’s overall strategy will include not just the global skills, expertise and brand from the rest of the business, but also very Massachusetts-centric targeting.

- Creative Agency Retainer – Annual retainer with DGC’s US creative agency which develops master creative assets across all channels to be leveraged in consumer-facing advertising/communications
- Media Agency Retainer – Annual retainer with DGC’s US media agency which will plan, purchase, and measure its media investment in each state
- Research and Insight – US agency partner will conduct various national and state-specific research projects to understand more about its target consumers, and also the impact of its marketing investments in each state
- Brand Health Tracking – Key to understanding the brand’s competitive position across Awareness, Consideration and First Choice, and how its marketing efforts are supporting its growth ambitions

D2-a-01 MINORITY OWNED BUSINESS

- Creative Production – Production of assets will be supported through a mix of both internal creative department and agency resource to deliver the core marketing assets needed for each state’s activation
- Platform Partnership Costs – These will be national (and sometimes even global) partnership deals/supporting costs that will be a shared cost across all states. Examples include Facebook, Sportsradar data feeds etc.
- Brand Ambassadors – While part of DGC’s national strategy will look to appoint a Brand Ambassador in 2023/24, the individual state budgets will only be used to leverage the asset in paid media, and be supported by local brand ambassador(s) where necessary

Consistent with the Massachusetts Responsible Gaming Framework, Betway is committed to ensuring that all brand communications are focused to appeal to consumers that are of a legal age. DGC, supported by Super Group, actively works with all its agencies, media outlets and platform partners to direct all media buys and placements towards an audience the overwhelming majority of which is over the age of 21 based on reliable, up-to-date audience composition data. This includes foregoing advertising in or near schools and other youth-oriented locations. Any advertising will also include relevant Terms and Conditions as well as 21+ messaging, and will not contain images, symbols, cartoon figures, celebrity/entertainer endorsements, and/or language directed to or intended to appeal to minors.

In terms of frequency of advertising, the majority of paid media spend is leveraged right before, and during key live sporting events – locally, nationally and internationally – and where DGC can guarantee the majority of the audience is of legal gambling age.

Outside of traditional advertising, any content that is generated for social platforms is targeted towards sports fans above the age of 21. Super Group ensures that content is not appealing to a younger audience and if exposed, any underage participant will be able to see the prominently feature 21+ messaging.

Lastly, any partnerships the Group has (including sponsorships) follow the same strict rules around the targeted audience for advertising. All contracts have strict 21+ terms around leveraging the brand with their fans. Super Group also work closely with each sponsorship team on a Code of Conduct which provides relevant information on state-specific regulations and our own legal requirements, as well as ways of working to ensure we all act in a responsible way and in a safe environment.

E1-c-01 PUBLIC HEALTH SAFETY

ATTACHMENT 1

SECTION E: RESPONSIBLE GAMING
E.1 RESPONSIBLE GAMING POLICIES

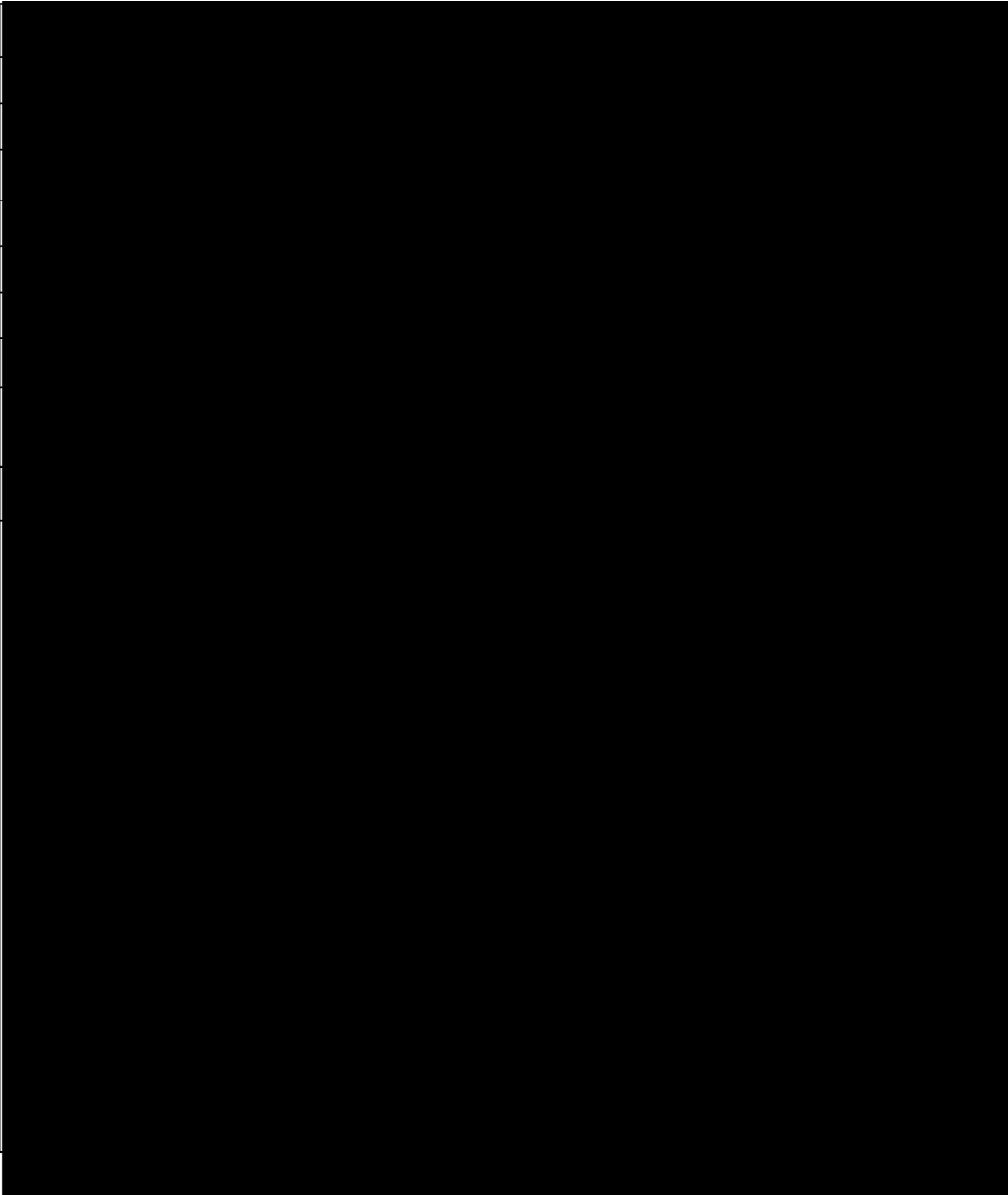
E1-c-01 – Promote public health and safety

DGC's Responsible Gambling and Patron Complaints Internal Control documents
(attached).

Responsible Gambling Policy

Business Governance Policy Document

CONFIDENTIAL



1. Introduction

DGC is committed to keeping gambling fair and safe for everyone. We incorporate the social responsibility requirements that a licensed operator must adhere to as well as the implications of company misconduct in our company culture.

DGC maintains a constant awareness and understanding of the developments within the field of responsible gambling. DGC further believes that there is a shared responsibility to help prevent the development of gambling related problems and ensure that problem gambling support services are available for those individuals requiring assistance.

DGC is committed to raising consumer protection standards in a genuine and transparent manner in order to secure a relationship of trust with its patrons. Through the provision of multiple innovative responsible gambling measures, easily accessible information and proactive customer interaction we ensure that consumers can monitor and control their gambling. These measures are further detailed below.

1.1 Purpose

The purpose of this policy document is to set out how Digital Gaming Corporation (hereafter referred to as “DGC”) intends to promote a culture of responsible gambling, not only internally but also through consistent communication and awareness to DGC’s patrons.

1.2 Scope

This policy document applies to all brands operating under DGC’s remote casino license.

1.3 Departments

This policy document applies to all DGC Group companies and third-party companies who provide services to DGC.

2. Objectives

Social responsibility is all about protecting people from gambling-related harm. In this respect, DGC has three objectives:

- **Keeping crime out of gambling.**
- **Conducting gambling in a fair and open way.**
- **Protecting children and other vulnerable persons from harm or exploitation from gambling.**

We continually strive to align our practices and procedures with these objectives.

2.1 Protection of Children and Other Vulnerable Persons

All account applicants must be 21 years or to participate in gambling activity within the DGC Group. Minors are strictly prohibited from using the casino software.

To further protect children, as required by state specific regulations, DGC may perform checks prior to the release of withdrawals to certify a patron is not delinquent on their child support.

2.2 Access to Gambling by Children and Young Persons

DGC warns potential patrons that underage gambling is an offence. We require patrons to verify their age before they are able to:

- deposit funds into their account
- access free-to-play games
- gamble with their own money, free bets or bonuses

DGC trains staff in the effective use of our age verification procedures. We perform regular reviews of our age verification systems and procedures, improving and updating them when new technologies and information become available.

In order to further safeguard against underage gambling, our gambling websites recommends filtering software to restrict access.

2.3 Employment of Children and Young Persons

DGC does not employ anyone under the age of 21.

2.4 Responsible Gambling

DGC offers various measures to allow patrons to manage their own betting levels and ensure they are gambling in a responsible manner and using our product for entertainment purposes. We also utilize a proactive Duty of Care program to assist patrons in highlighting when Responsible Gambling tools are required.

The Responsible Gambling logo is clearly displayed on our website with a direct hyperlink to our Responsible Gambling page to ensure full visibility and accessibility to our patrons.

In order to meet our Responsible Gambling and Duty of Care responsibilities, DGC offers the followings tools:

2.4.1 Visibility

Responsible Gambling Page

DGC has a Responsible Gambling page available on our website which clearly defines Responsible Gambling and contains the following information:

- DGC’s Responsible Gambling policy and commitment to keeping gambling fun and safe;
- Direct links to internet resources and websites which can assist with Problem Gambling;
- Information on practical tips to stay within responsible limits, myths associated to gambling, potential signs of a gambling problems as well as information regarding the risks associated with gambling;
- Full list of available Responsible Gambling Tools and instructions on how to use them including setting Wager, Deposit, Spend or Time limits as well as information on Temporary and Permanent Self Exclusion options;
- Information on External Internet/Statewide Exclusion options and the state relevant links;
- **State Specific Regulations**
 - DGC will display the Responsible Gambling messaging as required by Casino/Sports Betting regulations for example: “If you or someone you know has a gambling problem and wants help, call 1-800-GAMBLER” displayed as a prominent message
 - DGC will display a direct link to one or more organizations based in the United States dedicated to helping people with potential gambling problems as required by Casino/Sports Betting regulations

Session Duration

All patrons are provided with visibility into the duration of their current session.

State Specific

DGC offers the additional visibility tools to our patrons where required by state specific Casino/Sports Betting regulations:

- **Log in Notification**
 - Upon each login, the patron is advised of the previous login date and time.
 - Upon each login, the patron receives an electronic mail advising of the login. Should patrons not wish to receive these notifications, they can opt out.
- **Reality Check**
 - A pop-up notification is triggered upon a patron having US\$2500 lifetime deposits. This notification advises the patron of their Lifetime Deposits, the Responsible Gambling Tools available to them and of the 1-800-GAMBLER resource. Additionally, patrons are required to acknowledge this message prior to any further deposits or gameplay is permissible.
 - A reminder notification is triggered to each patron on the anniversary of the initial message advising of Responsible Gambling Tools available to them and of the 1-800-GAMBLER resource. Additionally, patrons are required to acknowledge this message prior to any further deposits or gameplay is permissible.

2.4.2 Limits (State Regulation Specific)

All limits are self-managed by the patron via the software platform to ensure complete control. The following options are available:

- Time Limits offered on a daily basis
- Deposit Limits offered on a daily, weekly and/or monthly basis
- Loss Limits offered on a daily, weekly and/or monthly basis
- Wager Limits offered on a single bet basis

Increases and decreases are permitted however there are measures in place to ensure patrons remain responsible.

Limit Decreases

Any decrease applied to an existing limit will be effective immediately or no later than upon the patron's next login.

Limit Increases

DGC will implement increases as defined by state Casino/Sports Betting Regulations with the following options available:

1. Any increase set to a patron's existing limit will become effective only after the time period of the previously set limit has expired and after the patron has confirmed the new limit.
2. Any increase set to a patron's existing limit will become effective after a 24-hour period.

2.4.3 Exclusion

DGC is committed to offering an extensive Exclusion program which serves in the patron's best interest. Our Staff are trained to direct patrons who wish to self-exclude to the most immediate method of performing and completing their request.

Upon receipt of a Self-Exclusion request, DGC intends to act in accordance with set regulatory guidelines to ensure a responsible, fair and transparent gambling environment. DGC also commits to participate in any required Regulatory Authority(s) Self-Exclusion Program.

Cooling Off is offered to patrons to provide a short-term period during which access will be restricted. Patrons are able to request cooling off over the following periods:

- 72 hours
- 1 week

- 1 month
- 3 months

Internal Exclusion is offered to patrons for a longer-term period whereby patrons will have no access to their account. Patrons are able to exclude for 6 months, 1 year or 5 years directly via the product or via Customer Support. Internal Exclusion will only be offered in the states where it is permitted by Casino/Sports Betting Regulations.

External Exclusion is offered to patrons for a longer-term period whereby patrons will have no access to their account. Patrons are able to exclude for 1 year, 5 years or on a lifetime basis directly via the product or by applying to the relevant regulatory body.

2.4.4 Duty of Care Program

The Customer Interaction Program is used to ensure DGC proactively identifies concerning behaviors and addresses them with our patrons. This program is based on series of key indicators which signify potential concerns in behavior. Using our knowledge of the expected behavior of a responsible gambler, we use models and other deterministic factors to identify where there is out of the ordinary behavior taking place.

DGC commits to ensuring all patrons are contacted when CIP determines it is required in order to maintain a responsible environment.

Further information can be obtained in the Duty of Care Program Internal Control document.

3. “Fair and Open” Provisions

DGC is committed to treating patrons fairly and openly. We display our Terms and Conditions and House Rules on all our gambling websites in an easily accessible way.

DGC’s terms and practices are aligned to the requirements and best practices detailed in the Casino Control Act as well as each state specific Casino/Sports Betting regulations.

DGC aims to empower patrons to make informed decisions about whether or not to gamble. We display the rules for each of our gambling opportunities in accordance with the requirements of each regulatory body. As additional requirements are released, DGC will update the Terms and Conditions, House Rules and Responsible Gambling page.

4. Marketing

DGC takes all reasonable steps to prevent marketing communications from posing a risk to vulnerable groups and to ensure all marketing of gambling products and services are performed in a socially responsible manner. DGC’s marketing does not target or entice minors, vulnerable persons or Excluded patrons.

We strive to be clear and transparent in our marketing.

Patrons with accounts closed for Exclusion or Self-Exclusion are removed from receiving marketing materials in a maximum of 72 hours from their account being closed.

Further details on our marketing can be found in a separate policy, the Marketing Guidelines Policy.

5. Measurement

DGC commits to ensuring all Responsible Gambling functionality, information display, communication and staff are held to a high level of measurement to ensure full compliance.

Ongoing training is provided to ensure all staff are optimally knowledgeable on all policies, processes and procedures. Functional testing is done to ensure all RG tools are performing as expected and the Responsible Gambling page is displaying the correct, and most up to date, information possible. Exception reporting is used to monitor the functionality and the communication in order to ensure any failures are identified as quickly as possible and corrected.

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SECTION E: RESPONSIBLE GAMING
E.2 ADVERTISING & PROMOTIONAL PLANS

E2-a-01 Estimated marketing budget in the Commonwealth

While DGC’s long-term expectation is that marketing will be between [REDACTED] of NGR, the focus is to initially upweight spend in the launch phase to ensure that adequate brand awareness and a solid customer base are built, to deliver against growth ambitions. This strategy, which has been tried and tested in many competitive regulated markets around the world, includes a larger marketing spend during the initial years after launch. This investment phase enables DGC to build a solid footing in any new market that it enters and follows the approach that Super Group takes around the world. The estimates outlined below are, if anything, on the conservative side and marketing spend in the initial years could be higher, depending how DGC sees the market playing out in its early stages. As a rough guide, DGC’s planned investment in media spend for the first three years is below:

TYPE OF SPEND	YEAR 1	YEAR 2	YEAR 3

It is worth highlighting that this marketing media budget is based solely on pure advertising media spend and does not take into account the below elements where DGC either leverages existing internal resource, or costs are shared across multiple states due to existing deals or partnerships. As in many other markets in which DGC operates, DGC’s overall strategy will include not just the global skills, expertise and brand from the rest of the business, but also very Massachusetts-centric targeting.

- Creative Agency Retainer – Annual retainer with DGC’s US creative agency which develops master creative assets across all channels to be leveraged in consumer-facing advertising/communications
- Media Agency Retainer – Annual retainer with DGC’s US media agency which will plan, purchase, and measure its media investment in each state
- Research and Insight – US agency partner will conduct various national and state-specific research projects to understand more about its target consumers, and also the impact of its marketing investments in each state
- Brand Health Tracking – Key to understanding the brand’s competitive position across Awareness, Consideration and First Choice, and how its marketing efforts are supporting its growth ambitions
- Creative Production – Production of assets will be supported through a mix of both internal creative department and agency resource to deliver the core marketing assets needed for each state’s activation

SECTION E: RESPONSIBLE GAMING
E.2 ADVERTISING & PROMOTIONAL PLANS

- Platform Partnership Costs – These will be national (and sometimes even global) partnership deals/supporting costs that will be a shared cost across all states. Examples include Facebook, Sportsradar data feeds etc.
- Brand Ambassadors – While part of DGC’s national strategy will look to appoint a Brand Ambassador in 2023/24, the individual state budgets will only be used to leverage the asset in paid media, and be supported by local brand ambassador(s) where necessary

Consistent with the Massachusetts Responsible Gaming Framework, Betway is committed to ensuring that all brand communications are focused to appeal to consumers that are of a legal age. DGC, supported by Super Group, actively works with all its agencies, media outlets and platform partners to direct all media buys and placements towards an audience the overwhelming majority of which is over the age of 21 based on reliable, up-to-date audience composition data. This includes foregoing advertising in or near schools and other youth-oriented locations. Any advertising will also include relevant Terms and Conditions as well as 21+ messaging, and will not contain images, symbols, cartoon figures, celebrity/entertainer endorsements, and/or language directed to or intended to appeal to minors.

In terms of frequency of advertising, the majority of paid media spend is leveraged right before, and during key live sporting events – locally, nationally and internationally – and where DGC can guarantee the majority of the audience is of legal gambling age.

Outside of traditional advertising, any content that is generated for social platforms is targeted towards sports fans above the age of 21. Super Group ensures that content is not appealing to a younger audience and if exposed, any underage participant will be able to see the prominently feature 21+ messaging.

Lastly, any partnerships the Group has (including sponsorships) follow the same strict rules around the targeted audience for advertising. All contracts have strict 21+ terms around leveraging the brand with their fans. Super Group also work closely with each sponsorship team on a Code of Conduct which provides relevant information on state-specific regulations and our own legal requirements, as well as ways of working to ensure we all act in a responsible way and in a safe environment.

E2-d-01 MARKETING TARGET AUDIENCE

ATTACHMENT 4

SECTION E: RESPONSIBLE GAMING **E.1 RESPONSIBLE GAMING POLICIES**

**E1-a-g-01 - Commitment to corporate social responsibility/
Support positive play/Promote public health and safety/Ensure responsible advertising and
marketing/Manage high-risk financial transactions/Engage the community/Commitment to
improvement and reporting**

DGC takes our responsibilities to our millions of customers extremely seriously. They play with Betway because they enjoy the social experiences that sports bring to their lives and the freedom that following your instincts gives you. They trust us to provide them with an enjoyable online gambling experience. And they know that we stand by fair gaming and provide a safe, secure, and responsible environment to play in.

We put considerable effort into getting to know our customers. The vast majority use our platforms to gamble in a responsible way and we will always actively defend their right to gamble responsibly across our range of first-class entertainment products.

But we are fully aware that, for a small minority of players, gambling can cause and/or exacerbate personal, financial, and mental health problems. So, we take our responsibility to provide them with a safe gambling environment and offering of support tools extremely seriously. Moreover, we are aware of the Commission's commitment to responsible gaming, not only in the upcoming round of sports licensure but also in its historic regulation of responsible gaming in the casino context. Massachusetts is recognized as a leader in this area for a reason – it has consistently called on operators to take problem play seriously, to honor requests for self exclusion, and to provide players with meaningful information on problem gaming. DGC shares this commitment and believes it applies readily to online sports wagering.

As such DGC has developed, and will maintain, amend, and adjust as necessary, a Responsible Gambling Policy which is set forth below, with notations as to the many intersections between the Policy and the Massachusetts Responsible Gaming Framework (the "RGF"). The procedures will be followed by the designated employees. All employees of DGC are expected to be knowledgeable of, and follow approved procedures consistent with, the policy. As part of their new employee orientation and annually as reinforcement training, all employees will receive training on the scope, practice, and procedures of DGC's RG policy.

In substance, DGC will ensure that:

1. All customer-facing employees are educated on responsible gaming.
2. All customer-facing employees are educated on how to recognize the signs of compulsive and problem gambling.
3. All customer-facing employees are educated on the social and economic costs of gambling disorder including debt, treatment costs, suicide, criminal behavior, unemployment, and domestic issues.

E2-d-01 MARKETING TARGET AUDIENCE

4. All customer-facing employees are educated on the relationship between gambling disorder and other addictive behaviors.
5. All customer-facing employees are educated on techniques to be used when a gambling disorder is suspected or identified.
6. All customer-facing employees are educated on techniques to be used to discuss gambling disorder with registered customers and advise registered customers to contact the 24 hour Massachusetts Problem Gambling Helpline (1-800-426-1234) for treatment information.
7. Links and/or electronic brochures and/or other literature describing responsible gaming, explaining characteristics of compulsive and problem gambling, and where to find professional assistance and/or treatment, are made available to customers and employees.
8. Underage gambling is prevented.
9. The relevant Responsible Gaming Line including a help resource is displayed on all webpages.
10. Advertising is done responsibly and avoids using individuals who appear to be under 21 years of age.
11. All customer-facing employees are educated on self-exclusion including where to direct a customer who requests to be self-excluded.
12. Effective procedures are implemented to ensure that all aspects of regulations concerning self-exclusion are complied with.
13. Attendance at employee orientation is mandated and attendance at annual reinforcement training is mandated regarding compulsive and problem gambling for all customer-facing employees.
14. Orientation and annual reinforcement training content is reviewed annually, or more frequently, by the relevant Director, Divisional Manager or RG-related Specialist.

DGC's Responsible Gambling Policy (attached) provides in pertinent part:

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E2-d-01 MARKETING TARGET AUDIENCE

ATTACHMENT 5

SECTION E: RESPONSIBLE GAMING
E.2 ADVERTISING & PROMOTIONAL PLANS

DGC Responsible Gambling Policy

Responsible Gambling Policy

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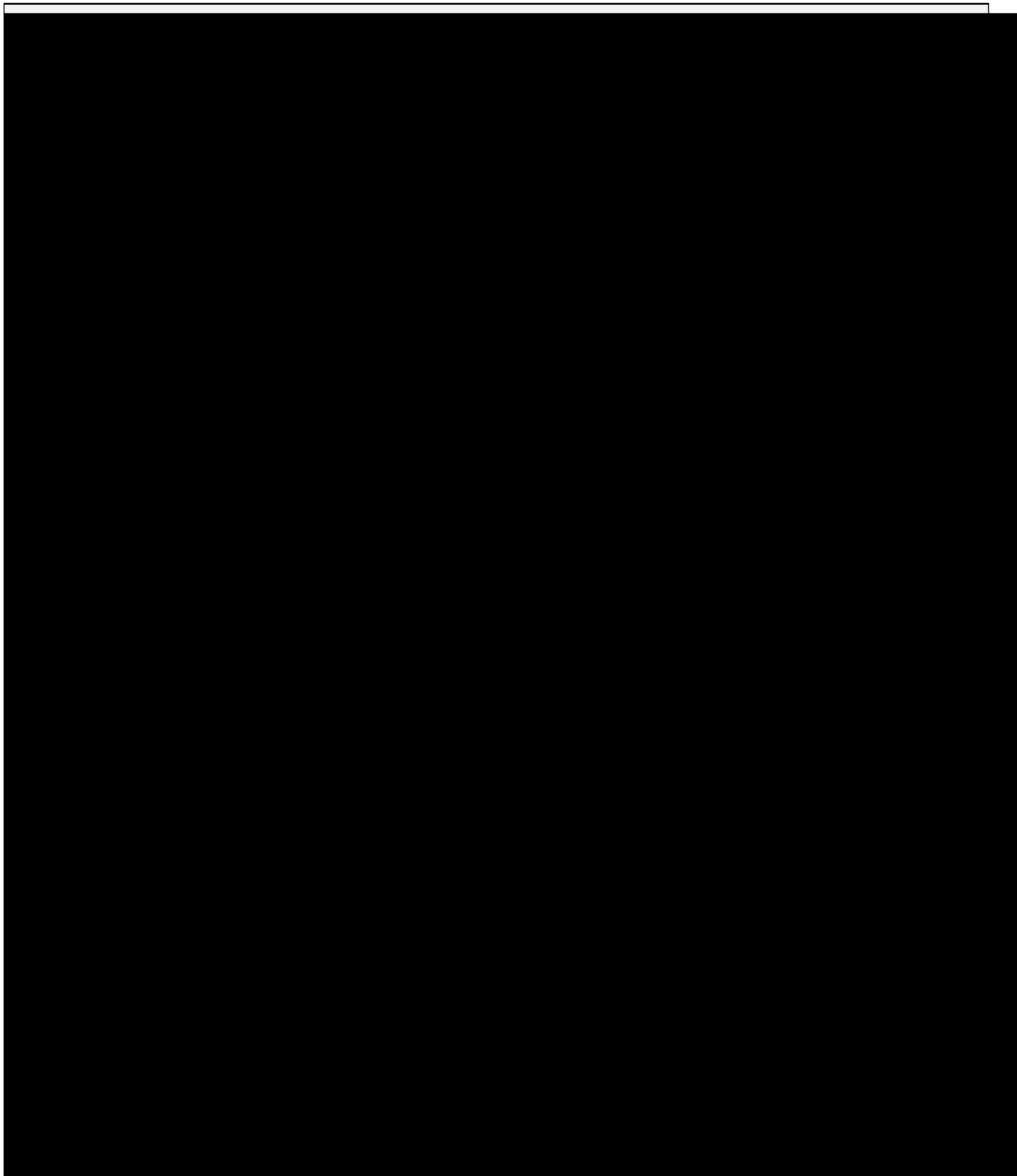
SECTION E: RESPONSIBLE GAMING
E.2 ADVERTISING & PROMOTIONAL PLANS

DGC Responsible Gambling Policy

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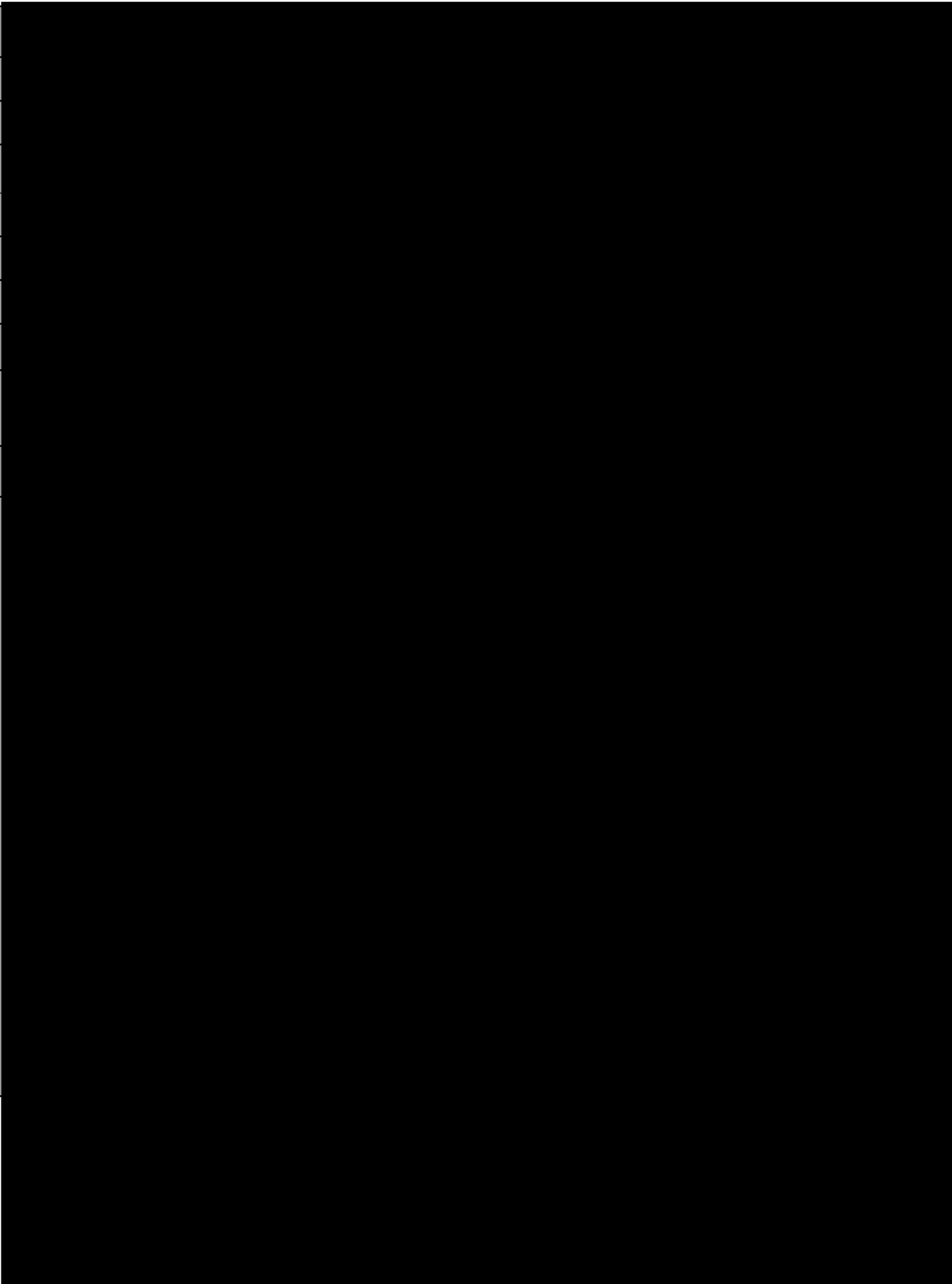
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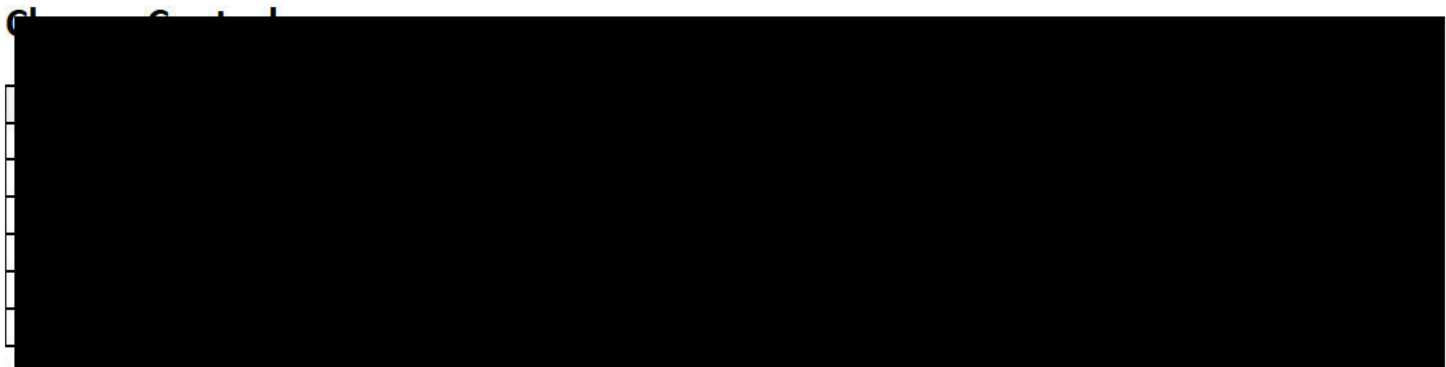
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E2-g-01- WAGERING LEGALLY

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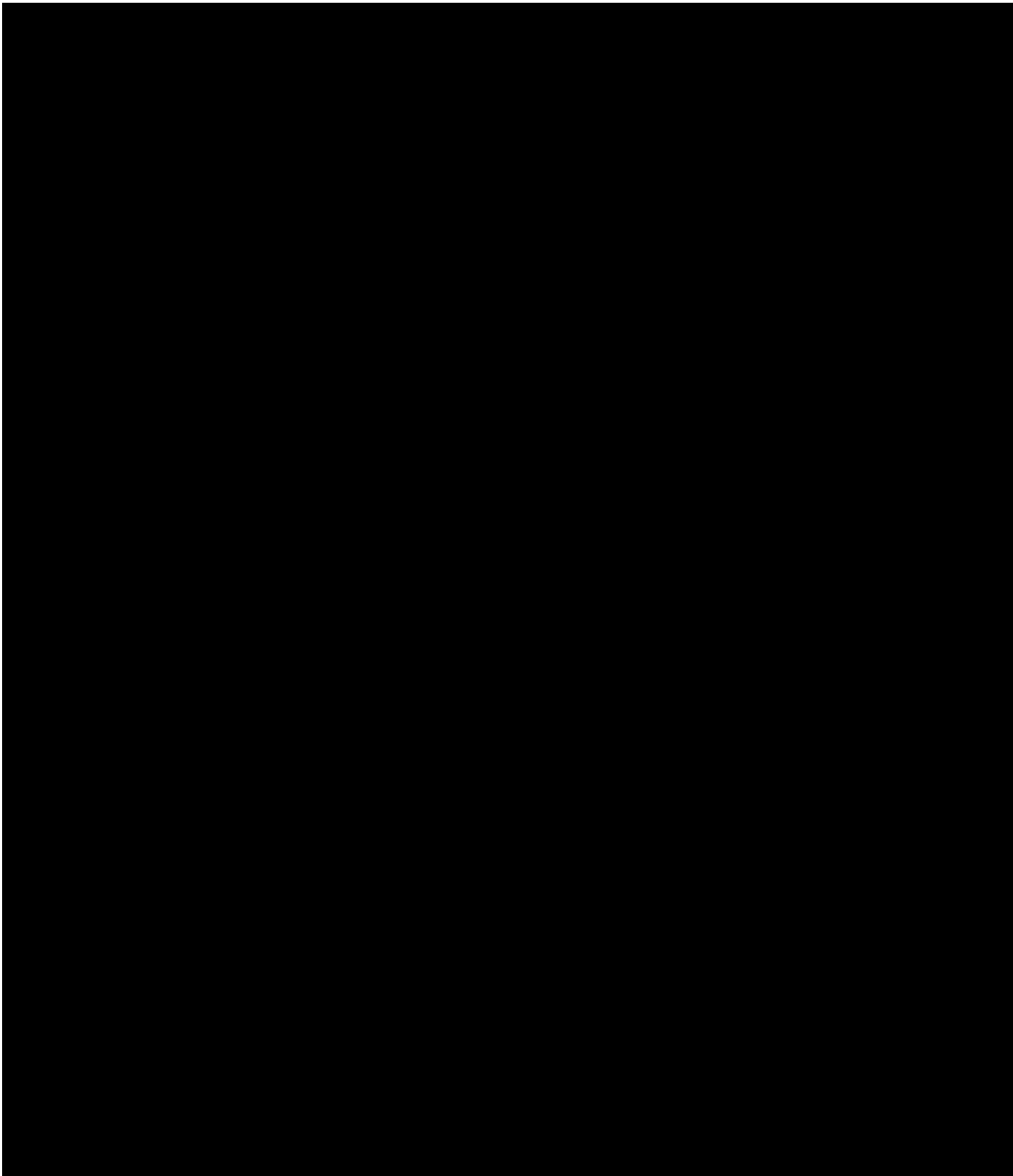
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E2-h-01-MARKETING PROMOTIONS

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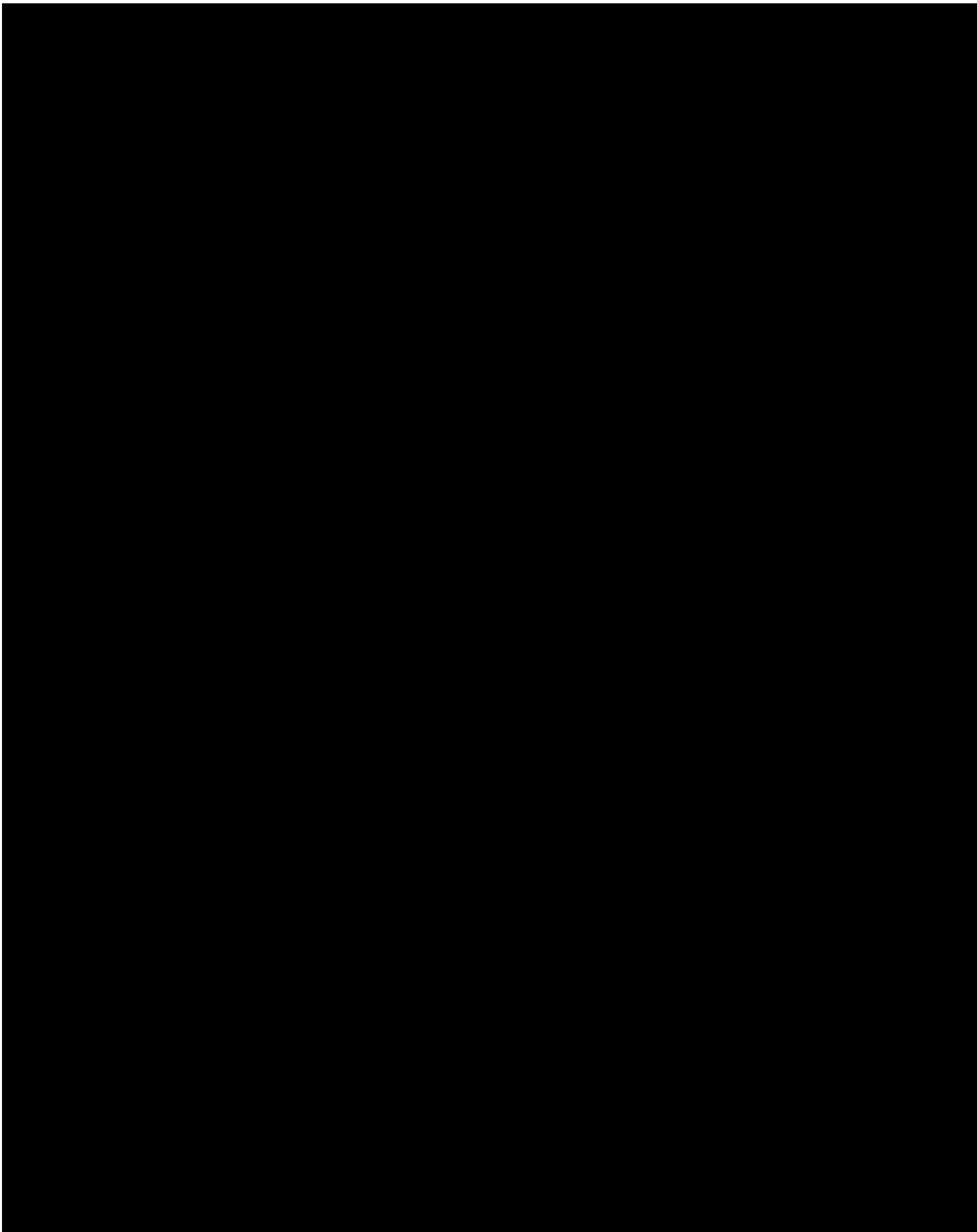
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E3-c-01-MITIGATE GAMBLING HARM

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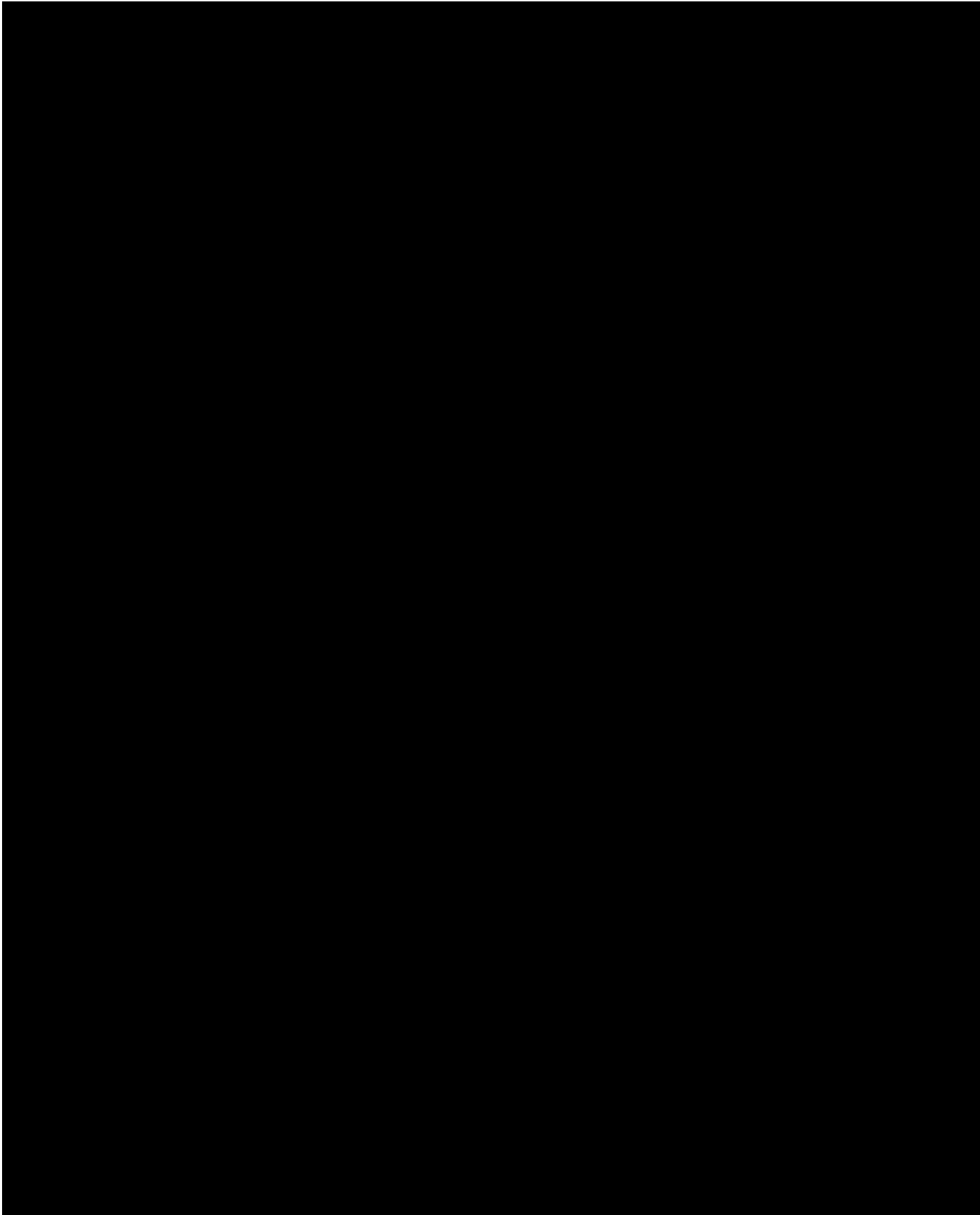
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E3-d-01-PROBLEM GAMBLING

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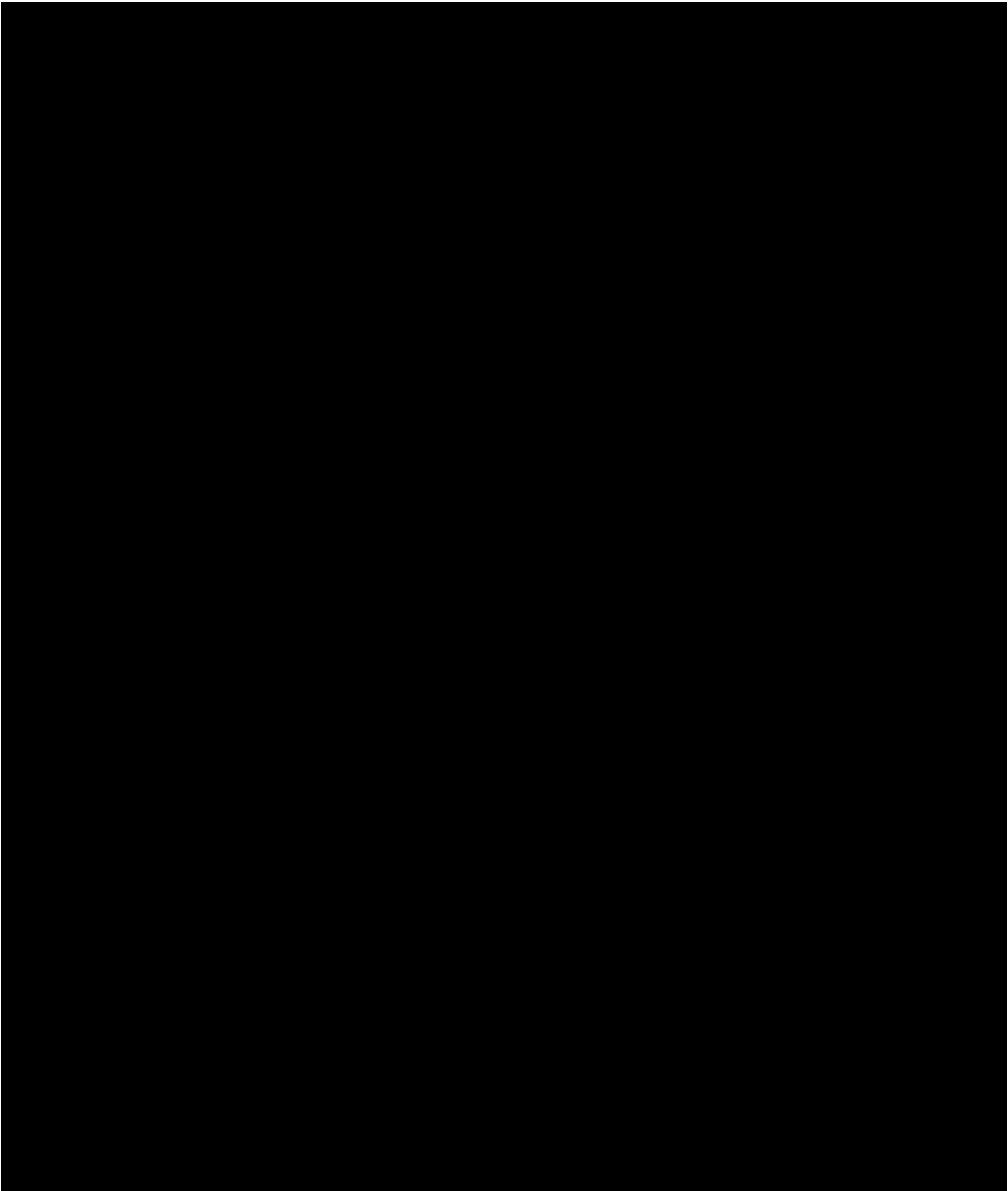
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E3-e-01-AWARDS RECOGNITION

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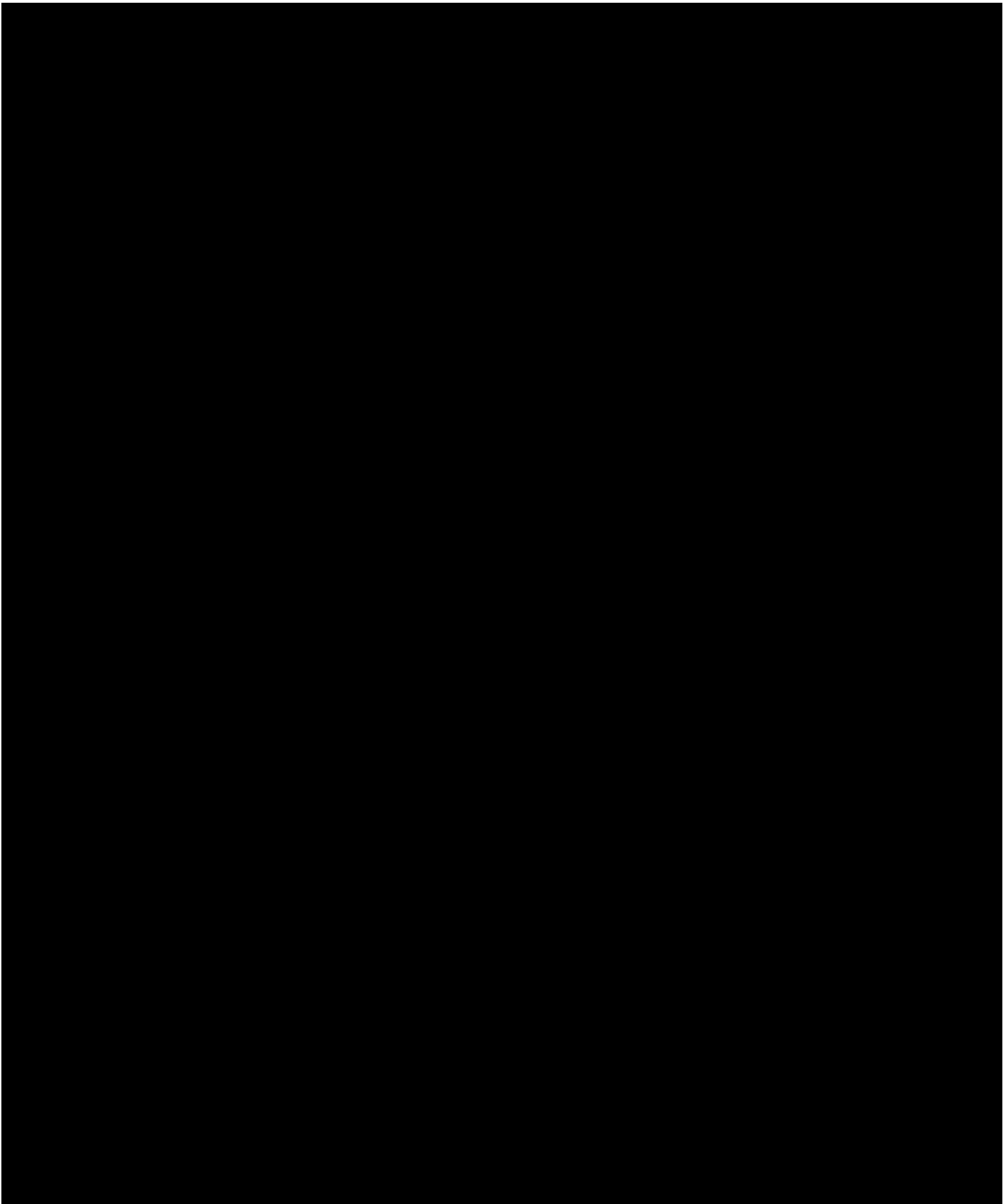
SECTION E: RESPONSIBLE GAMING
E.1 RESPONSIBLE GAMING POLICIES

DGC Responsible Gambling Policy

Responsible Gambling Policy

Business Governance Policy Document

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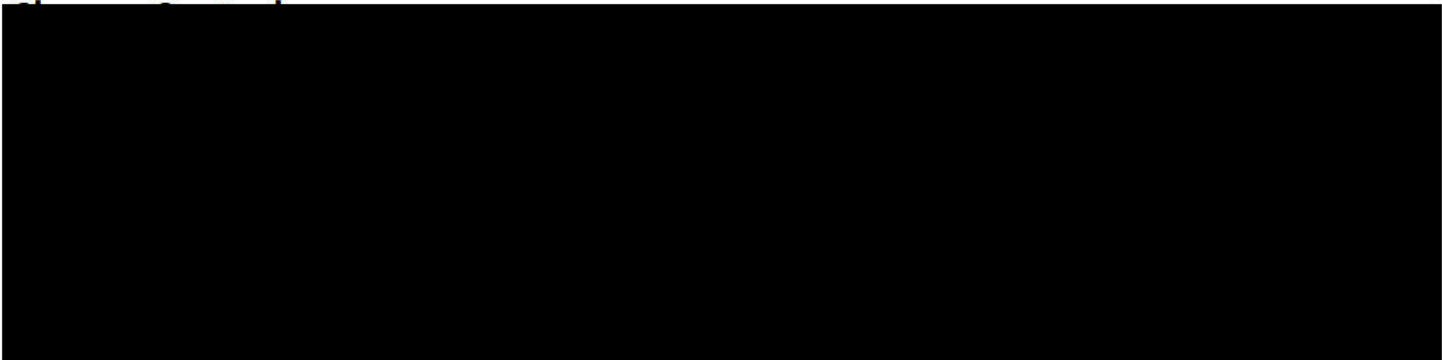
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SECTION E: RESPONSIBLE GAMING
E.3 HISTORY OF DEMONSTRATED COMMITMENT

E3-f -01 - List any fines, violations, citations, and/or corrective action required by the applicant in response to insufficient or improper policies, procedures, operations, advertising/marketing, and/or any other business related to sports wagering or other gambling enterprises

Regulatory Authority	Date of Fine Violation Citations	Nature of Incident	Outcome
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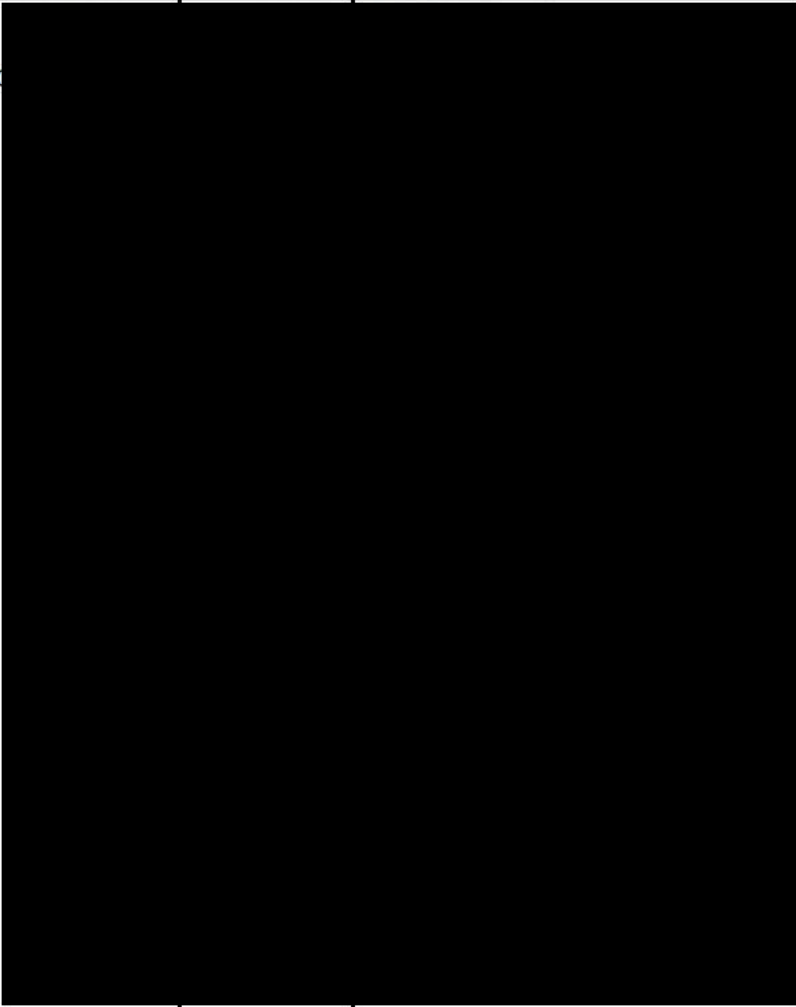
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E.3 HISTORY OF DEMONSTRATED COMMITMENT

Regulatory Authority	Date of Fine Violation Citations	Nature of Incident	Outcome
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SECTION E: RESPONSIBLE GAMING
E.3 HISTORY OF DEMONSTRATED COMMITMENT

Regulatory Authority	Date of Fine Violation Citations	Nature of Incident	Outcome
			

SECTION E: RESPONSIBLE GAMING
E.3 HISTORY OF DEMONSTRATED COMMITMENT

Regulatory Authority	Date of Fine Violation Citations	Nature of Incident	Outcome
			

F2-1-01-USER ACCOUNT INFORMATION

ATTCHMENT 2

SECTION F: TECHNOLOGY
F.2 KNOW YOUR CUSTOMER

DGC Anti-Money Laundering & Counter-Terrorism Financing Compliance Program and Global Sanctions Policy (attached).

Anti-Money Laundering & Counter-Terrorism Financing Compliance Program

Business Governance Document

Anti-Money Laundering & Counter Terrorism Financing Compliance Program

Category	Business Governance Document
Version	V9
Applicability	All Employees and third-party companies who provide services to Digital Gaming Corporation USA
Release Date	March 19, 2021
Next Review Date	March 01, 2022
Owner	AML Officer

PURPOSE

The purpose of this document is to set out how Digital Gaming Corporation USA (DGC) intends to maintain its AML Compliance Program and identify, prevent and report suspicion of money laundering and terrorist financing.

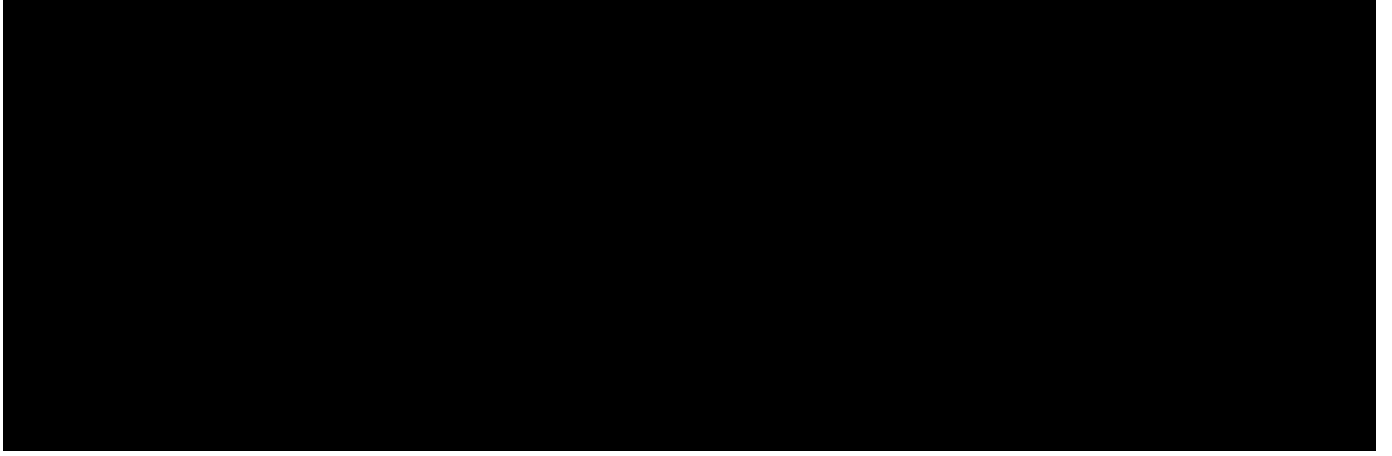
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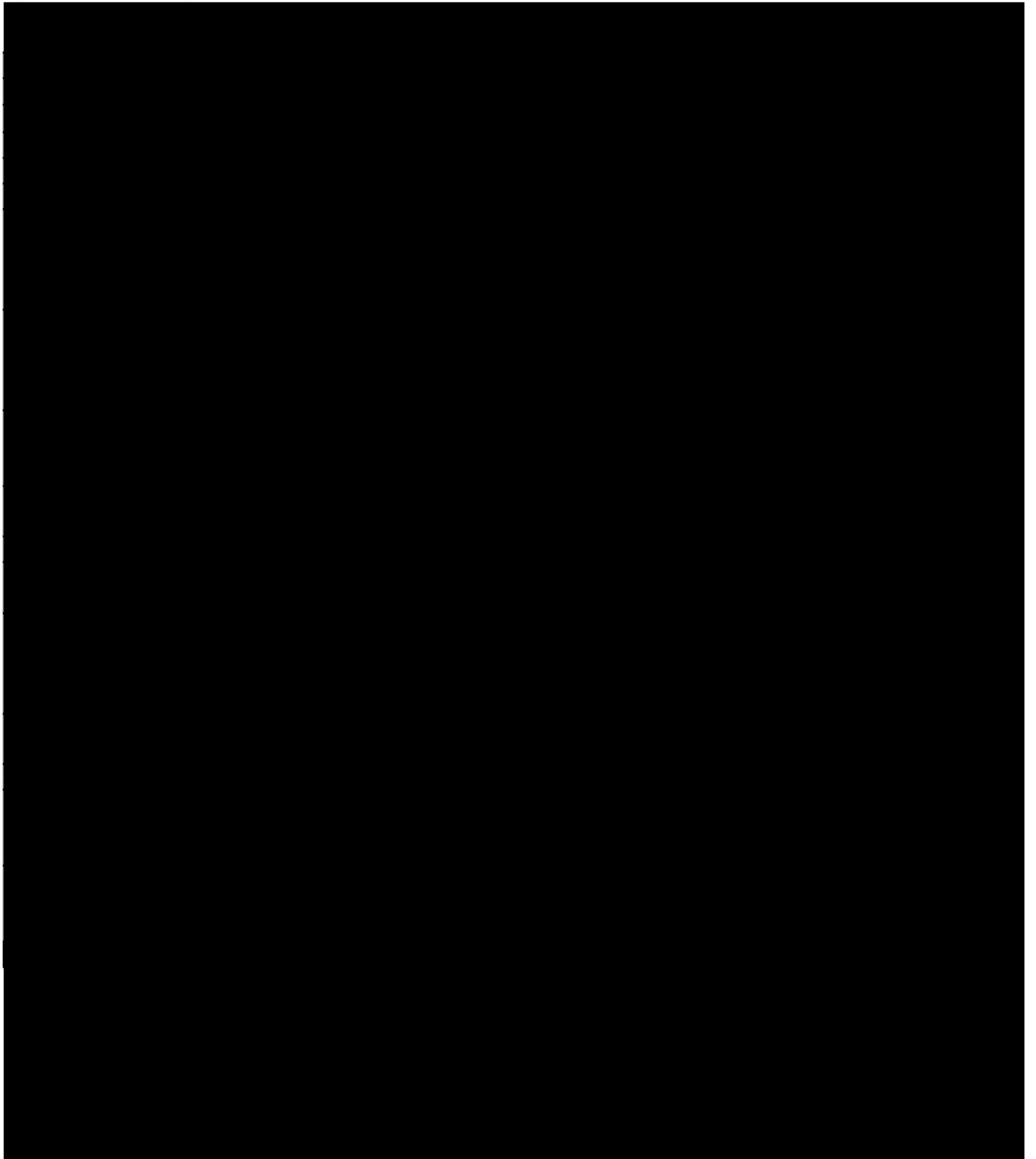
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F2-3-01-RISK FRAUDULENT ACTIVITY

ATTCHMENT 2

SECTION F: TECHNOLOGY
F.2 KNOW YOUR CUSTOMER

**DGC Anti-Money Laundering & Counter-Terrorism Financing Compliance Program and
Global Sanctions Policy (attached).**

Anti-Money Laundering & Counter-Terrorism Financing Compliance Program

Business Governance Document

Anti-Money Laundering & Counter Terrorism Financing Compliance Program

Category	Business Governance Document
Version	V9
Applicability	All Employees and third-party companies who provide services to Digital Gaming Corporation USA
Release Date	March 19, 2021
Next Review Date	March 01, 2022
Owner	AML Officer

PURPOSE

The purpose of this document is to set out how Digital Gaming Corporation USA (DGC) intends to maintain its AML Compliance Program and identify, prevent and report suspicion of money laundering and terrorist financing.

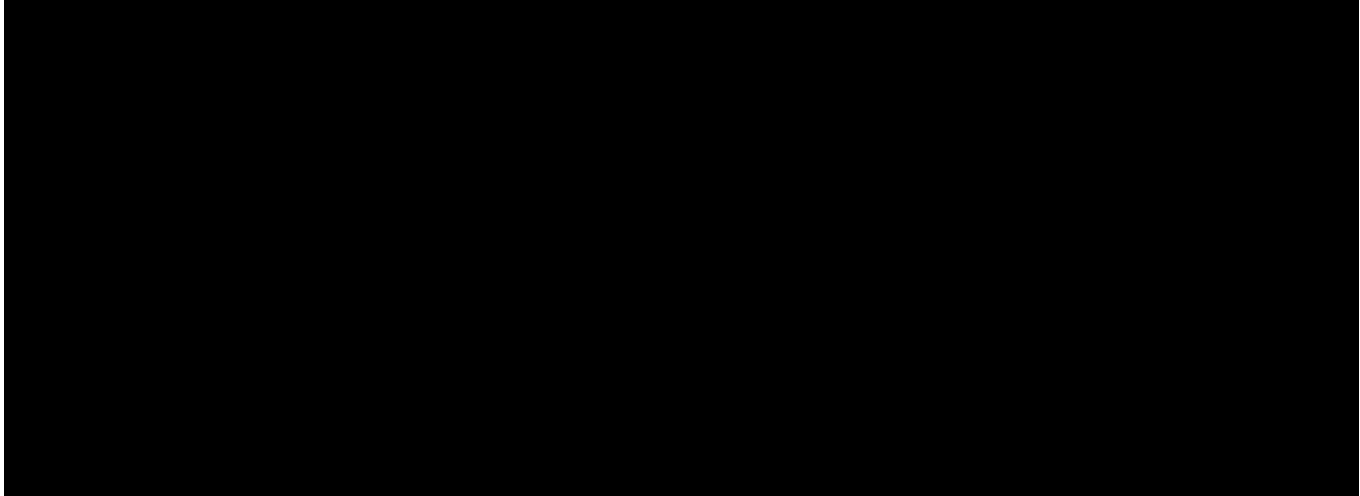
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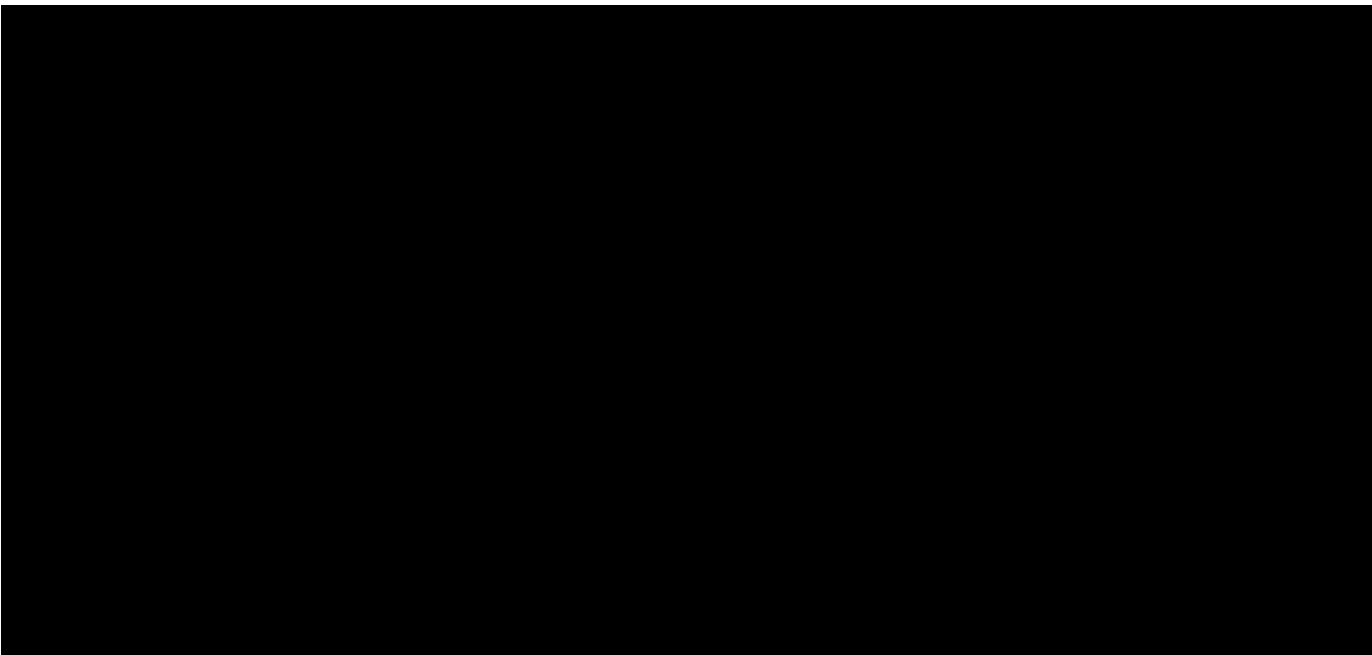
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Change Control

Version	Date	Changed by	Comments/Reason
Draft	March 9, 2020	Charl Baard	Creation
V1	April 7, 2020	Marsha Brusgard	Draft finalized
V1.1	April 20, 2020	Christa Baard	Glossary added
V1.2	August 26, 2020	Christa Baard	Changed draft to final.
V1.3	August 31, 2020	Christa Baard	Updated DGC physical address
V2	September 17, 2020	Marsha Brusgard	Addendum A, B & C added, restructuring of policy, addition of AML Risk Committee requirements, addition of Source of Funds policy, addition of Risk Assessment Matrix
V3	November 13, 2020	Marsha Brusgard & Elina Portman	Appendix D-J added, restructuring of policy. Enhancement of SOW and SAR Filing requirements, enhancement of Risk Matrix, renaming of addendum to appendix.
V3.1	November 30, 2020	Marsha Brusgard & Elina Portman	Minor adjustments to formatting; update of training section; preparation of document for signature by Board
V3.2	December 15, 2020	Marsha Brusgard	Addition of MRB related policy under Section 8.1.2 and additional information added under 4.3.1.
V.4	December 18, 2020	Marsha Brusgard	Addition of Appendix K
V4.1	January 27, 2021	Marsha Brusgard	Enhancement of MRB related policy under 7.4.5.2, 8.1.2
V4.2	February 11, 2021	Marsha Brusgard	Addition of Finance Manager, Divisional Manager – Retention Operations and Divisional Manager – Ecommerce and Risk to AML Compliance Committee in 4.3
V5	February 18, 2021	Andre Chapman & Marsha Brusgard	Addition of Appendix L, full review of program
V6	February 26, 2021	Andre Chapman	Addition of Appendix M, approval of AML Policy
V7	March 11, 2021	Elina Portman & Marsha Brusgard	Minor adjustments to the language about land-based casinos to make the policy more broadly applicable.
V8	March 16, 2021	Elina Portman	Further adjustments to the language about land-based casinos to make the policy more broadly applicable
V9	March 19, 2021	Adam Felman	Minor adjustments and revised attachment M