



NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), and St. 2025, c. 2, notice is hereby given of a public meeting of the **Massachusetts Gaming Commission**. The meeting will take place:

Thursday | February 26, 2026 | 10:00 a.m.

VIA REMOTE ACCESS: 1-646-741-5292

MEETING ID/ PARTICIPANT CODE: 111 456 8928

All meetings are streamed live at www.massgaming.com.

Please note that the Commission will conduct this public meeting remotely utilizing collaboration technology. Use of this technology is intended to ensure an adequate, alternative means of public access to the Commission's deliberations for any interested member of the public. If there is any technical problem with the Commission's remote connection, an alternative conference line will be noticed immediately on www.massgaming.com.

All documents and presentations related to this agenda will be available for your review on the morning of the meeting date by visiting our website and clicking on the News header, under the Meeting Archives drop-down.

PUBLIC MEETING - #583

1. Call to Order – Jordan Maynard, Chair

2. Meeting Minutes

- a. January 29, 2026 **VOTE**
- b. February 9, 2026 **VOTE**
- a. Executive Session Minutes

- I. Executive Session **VOTE**

The Commission anticipates that it will meet in executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and c. 23N, § 6(i): **January 13, 2023**; G.L. c. 30A, § 21(a)(3): **July 27, 2023, February 1, 2024, November 12, 2025 and November 20, 2025 at 11:32 AM**; and G.L. c. 30A, § 21(a)(7); G.L. c. 23N, § 6(i); and G.L. c. 4, § 7(26)(c) and (n): **November 20, 2025 at 10:39 AM**. The public session of the Commission meeting will reconvene at the conclusion of the executive session.

- January 13, 2023 **VOTE**



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- July 27, 2023 **VOTE**
- February 1, 2024 **VOTE**
- November 12, 2025 **VOTE**
- November 20, 2025 at 10:39 AM **VOTE**
- November 20, 2025 at 11:32 AM **VOTE**

3. Administrative Update – Dean Serpa, Executive Director

- a. Snow Emergency Recognition of MGC Gaming Agents

4. Community Affairs Division – Derek Lennon, CFAO; Mary Thurlow, Senior Program Manager

- a. Encore Boston Harbor Quarterly Report – Juliana Catanzariti, Executive Director, Legal; Tom Coffey, Executive Director of Security and Investigations

- i. Executive Session **VOTE**

The Commission anticipates that it will meet in executive session in accordance with G.L. c.30A, §21(a)(7) to comply with G.L. c.23K, §21(a)(7) for the specific purpose of reviewing the proposed multi-year capital expenditure plan [described in 205 CMR 139.09], and any corresponding materials, submitted relative to Encore Boston Harbor, as discussion of this matter in public would frustrate the purpose of the statute and associated legal authorities where the capital expenditure plan at issue is covered by a nondisclosure agreement between the Massachusetts Gaming Commission and Encore Boston Harbor. The public session of the Commission meeting will reconvene at the conclusion of the executive session.

- b. Plainridge Park Casino Quarterly Report – North Grounsell, General Manager; Thomas Alger, VP of Finance; Robert Charette, Director of Security; Kathy Lucas, Vice President of Human Resources

- i. Executive Session **VOTE**

The Commission anticipates that it will meet in executive session in accordance with G.L. c.30A, §21(a)(7) to comply with G.L. c.23K, §21(a)(7) for the specific purpose of reviewing the proposed multi-year capital expenditure plan [described in 205 CMR 139.09], and any corresponding materials, submitted relative to Plainridge Park Casino, as discussion of this matter in public would frustrate the purpose of the statute and associated legal authorities where the capital expenditure plan at issue is covered by a nondisclosure agreement between the Massachusetts Gaming Commission and Plainridge Park Casino. The public session of the Commission meeting will reconvene at the conclusion of the executive session.



Massachusetts Gaming Commission

- c. MGM Springfield Quarterly Report – Daniel Miller, Compliance Director
 - I. Executive Session **VOTE**
 The Commission anticipates that it will meet in executive session in accordance with G.L. c.30A, §21(a)(7) to comply with G.L. c.23K, §21(a)(7) for the specific purpose of reviewing the proposed multi-year capital expenditure plan [described in 205 CMR 139.09], and any corresponding materials, submitted relative to MGM Springfield, as discussion of this matter in public would frustrate the purpose of the statute and associated legal authorities where the capital expenditure plan at issue is covered by a nondisclosure agreement between the Massachusetts Gaming Commission and Blue Tarp ReDevelopment, d/b/a MGM Springfield. The public session of the Commission meeting will reconvene at the conclusion of the executive session.
 - d. Update on FY2027 Community Mitigation Fund Grant Applications
5. Sports Wagering Division – Carrie Torrisi, Division Chief of Sports Wagering
- a. Update to Penn Sports Interactive House Rules – Andrew Steffen, Compliance Operations Manager **VOTE**
 - b. MGM Springfield Request to Payout Lost Wagers pursuant to 205 CMR 238.47 – Andrew Steffen, Compliance Operations Manager **VOTE**
 - c. Petition by FanDuel to add SIS eSports to the Event Catalog pursuant to 205 CMR 247.03(1) – Andrew Steffen, Compliance Operations Manager **VOTE**
6. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
- a. Review of the IEB’s Recommendation of Assessment of a Civil Administrative Penalty pursuant to 205 CMR 232.02(2), regarding noncompliance related to email communications sent by Bally’s Interactive, LLC (“Bally’s”) to excluded individuals. – Nathaniel Kennedy, Enforcement Counsel **VOTE**
7. Legal Division – Kevin Scanlon, General Counsel; Justin Stempeck, Chief Deputy General Counsel
- a. 205 CMR 116.10: *Interim Authorization* - Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption – Justin Stempeck, Chief Deputy General Counsel; Caitlin Monahan, Director of Investigations and Enforcement Bureau **VOTE**
 - b. 205 CMR 238.30: *Acceptance of Sports Wagers* - Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption – Justin Stempeck, Chief Deputy General Counsel; Carrie Torrisi, Division Chief of Sports Wagering **VOTE**



Massachusetts Gaming Commission

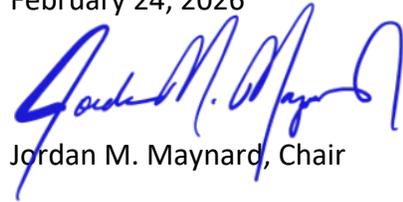
8. Continued discussion of VIP Programs - Mark Vander Linden, Director of Research and Responsible Gaming; Carrie Torrisi, Division Chief of Sports Wagering

9. Commissioner Updates

10. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: February 24, 2026 | 10:00 a.m. EST

February 24, 2026



Jordan M. Maynard, Chair

If there are any questions pertaining to accessibility and/or further assistance is needed, please email Grace.Robinson@massgaming.gov.



Massachusetts Gaming Commission



**Massachusetts Gaming Commission
Meeting Minutes**

Date/Time: January 29, 2026, 9:30 a.m.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 996 2599

The Commission conducted this public meeting remotely utilizing collaboration technology. Use of this technology was intended to ensure an adequate, alternative means of public access to the Commission’s deliberations for any interested member of the public.

Commissioners Present:

Chair Jordan Maynard
Commissioner Eileen O’Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

1. [Call to Order](#) (00:00)

Chair Maynard called to order the 579th Public Meeting of the Massachusetts Gaming Commission (“Commission”). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. [Meeting Minutes](#) (00:38)

a. [December 18, 2025](#) (00:48)

The December 18, 2025 public meeting minutes were included in the Commissioners’ Packet on pages 4 through 23.

Commissioner Brodeur moved that the Commission approve the December 18, 2025 public meeting minutes as included in the Commissioners’ Packet and discussed here today, subject to any revisions for typographical errors or other non-material matters. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. January 8, 2026 (01:32)

The January 8, 2026 public meeting minutes were included in the Commissioners' Packet on pages 24 through 28.

Commissioner Brodeur moved that the Commission approve the January 8, 2026 public meeting minutes as included in the Commissioners' Packet and discussed here today, subject to any revisions for typographical errors or other non-material matters. Commissioner O'Brien seconded the motion

Roll call vote:

Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Abstain.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed, 4-0 with one abstention.

3. Racing Division (02:25)

a. Race Horse Development Fund benefits for drivers and jockeys

Director of Racing and Chief Veterinarian Dr. Alexandra Lightbown explained that this matter was initially brought forward at the December 18, 2025 public meeting. She explained that on December 18, 2025, the Commission voted on the funds to be distributed to the standardbred drivers for health and benefits funds, and that before the Commission now was the determination of funds to be distributed to the thoroughbred jockeys. She noted that the distribution was different due to how the jockey and driver organizations were set up. *A memorandum and letters from stakeholders were included in the Commissioners' Packet on pages 29 through 35.*

Dr. Lightbown explained that there were no active jockeys in Massachusetts, but there were five permanently disabled jockeys. She stated that in the past, the jockeys would receive \$1,000 in benefits and that it was suggested at the December 18, 2025 meeting that there could be a 3% cost-of-living adjustment ("COLA"). She noted that the New England Horsemen's Benevolent and Protective Association ("NEHBPA") had 100 members on old age assistance and that they had not received a COLA increase on payments received. She noted that the Race Horse Committee previously decided how the money was split and that the figures had not changed since 2021. She stated that the Race Horse Committee could convene, review the distributions holistically, and determine whether it made sense to change the percentages.

Dr. Lightbown explained that 80% of the Race Horse Development Fund went to purses, 16% went to the breeder program, and 4% went to health and pension benefits. She noted that these percentages were then split between thoroughbred jockeys and standardbred drivers. She explained that 92% of the purses went to standardbreds and 8% went to thoroughbreds. She stated that 75% of the breeder program funds went to standardbreds and 25% went to thoroughbreds. She noted that health and pension funds were split evenly between standardbred and thoroughbred.

Commissioner Skinner withdrew her previous request to consider a 3% COLA for this year on the amount given to jockeys. She stated that she was able to review the budgeting calculations and thanked the NEHBPA for cooperating with the Commission's requests. She stated that she now understood more about the process and that she would withdraw her request on the condition that the Commission take the steps necessary to reconvene the Race Horse Committee.

Commissioner Hill thanked Commissioner Skinner for bringing this topic to the Commission's attention. He noted that he wanted to see the payments increase but recognized that it was a complicated formula and revenue scheme. He suggested that he and Commissioner O'Brien could reconvene the Race Horse Committee to review the numbers. The Commission reached a consensus to reconvene the Race Horse Committee.

Commissioner Hill moved that under G.L. c. 23K, § 60(c)(iii), \$1000 shall be paid by the Thoroughbred horsemen's organization to the thoroughbred jockeys' organization for the reasons discussed here today and as included in the Commissioners' packet. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

4. Finance Division (12:27)

a. FY2026 Mid-Year Budget Update

Chief Financial and Accounting Officer ("CFAO") Derek Lennon presented the mid-year budget update. *A memorandum and budget spreadsheets were included in the Commissioners' Packet on pages 36 through 44.*

CFAO Lennon explained that the budget was updated to increase the Gaming Control Fund's IT spending projections due to the renewal of central monitoring system contract. He stated that this change was budget neutral due to savings in payroll and fringe benefits. He stated that the

assessments on licensees for the Gaming Control Fund and Public Health Trust Fund would be adjusted to align with each licensee's proportional share of gaming positions.

2. Sports Wagering Division (17:32)

a. DraftKings Request for Temporary Waiver from Commission's Amended 205 CMR 247.07(5) and 205 CMR 248.10(2)

Chief of Sports Wagering Carrie Torrisi presented DraftKings' request for temporary waiver from the Commission's amended versions of 205 CMR 247.07(5) and 205 CMR 248.10(2). She explained that effective December 19, 2025, the Commission's regulations prohibited indirectly funding a sports wagering account by converting cryptocurrency to cash. She stated that before this amendment went into effect, DraftKings was working towards the launch of a new deposit method that would allow for deposit of converted cryptocurrency through a third-party platform.

Chief Torrisi further explained that DraftKings was launching the new deposit method in four states but not Massachusetts. She stated that DraftKings was developing technology necessary to segregate funds deposited from converted cryptocurrency in other jurisdictions so that those funds could not be utilized by Massachusetts accounts. She stated that DraftKings was seeking a waiver from the requirements of 205 CMR 247.07(5) and 205 CMR 248.10(2) through May 1, 2026 so that it could implement the fund segregating technology and perform testing to ensure funds are segregated. *A memorandum and DraftKings' request were included in the Commissioners' Packet on pages 47 through 51.*

Chief Torrisi stated that the Sports Wagering Division recommended the approval of the temporary waiver with the condition that DraftKings provide a full reporting of any transactions in which a Massachusetts account received cryptocurrency converted to cash indirectly from an authorized jurisdiction during the waiver period. She stated that the Division further recommended that Commission staff conduct an audit six-months after the segregation tool was finalized to ensure that no indirect cryptocurrency funds were transferred to a Massachusetts account after the waiver expired.

Commissioner O'Brien asked if all cryptocurrency funds that were transferred to a Massachusetts account during the waiver period would be segregated out once the technology was implemented. Chief Torrisi stated that the accounting would take place during the waiver period and would end once the tool to segregate funds was implemented. She stated that the audit would occur six months after that. Commissioner O'Brien stated that she had a fundamental opposition to the request given the status of cryptocurrency. She noted that this deposit method would not be launching in most jurisdictions and asked that DraftKings defer implementation in the other states until it was ensured that funds could be segregated.

Commissioner Skinner expressed that she shared Commissioner O'Brien's concerns in that deferring implementation would be preferable, but she did not want to stand in the way of business moving forward. She stated that it was not unreasonable to provide a waiver through May. She stated that it was important to conduct the audit to ensure that all concerns were addressed. She stated that she would be okay with granting the waiver request.

Chair Maynard stated that the regulation was changed while DraftKings was developing this deposit method and that he did not want to get in the way of its progress. He noted that Kentucky, Vermont, New Hampshire, and Illinois permitted use of cryptocurrency converted to cash and that asking DraftKings to defer implementation of the deposit method would affect those states' revenue. He stated that from a policy perspective, compliance was the goal and that DraftKings was working hard to comply. He stated that he would vote to approve the waiver.

Commissioner Hill stated that he agreed with Chair Maynard. Commissioner Brodeur stated that due to the reasons discussed, information provided, and limited nature of the waiver, he would vote to approve it.

Commissioner Hill moved that, pursuant to 205 CMR 202.03(2), the Commission issue a temporary waiver to DraftKings through May 1, 2026 from the requirements in 205 CMR 247.07(5) and 205 CMR 248.10(2), subject to the condition(s) discussed here today, as granting the waiver meets the requirements specified in 205 CMR 102.03(4) and is consistent with the purposes of G.L. c. 23N. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O'Brien: Nay.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-1.

b. [Updates to DraftKings House Rules](#) (26:54)

Compliance Officer David Harrison presented updates to DraftKings' house rules. *A memorandum and updated house rules language were included in the Commissioners' Packet on pages 45 through 46.*

Commissioner Hill moved that the Commission approve the updates to DraftKings' House Rules as included in the Commissioners' Packet and discussed here today. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

5. [Investigations and Enforcement Bureau](#) (29:39)

a. Plainridge Park Casino’s Request for an Amendment to the Beverage License

Licensing Manager Richard Lawless presented Plainridge Park Casino’s (“PPC”) request to amend its beverage license. He stated that the request would add two beverage carts to service to allow delivery of alcohol on the gaming floor and that the licensed beverage area would remain unchanged. He stated that the Licensing Division reviewed the application and recommended that it be approved. *PPC’s request and a memorandum were included in the Commissioners’ Packet on pages 52 through 55.*

Chair Maynard asked if it was standard practice in the industry to use beverage carts. Manager Lawless stated that other Penn Entertainment properties used beverage carts but that he was unaware if carts were used at other casinos. Chair Maynard stated that the information provided addressed his concerns related to storage and locking. Commissioner Skinner stated that she had seen similar requests before and that beverage carts were not a new concept.

Commissioner Skinner moved that the Commission approve the request submitted by Plainridge Park Casino to amend its beverage license to add two beverage carts to serve alcohol on the gaming floor as included in the Commissioners’ packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

6. [Legal Division](#) (41:03)

a. 205 CMR 250: Protection of Minors and Underage Youth from Sports Wagering – Discussion and Review of Regulation Amendments and Small Business Impact Statement for authorization to begin the promulgation process by Commission

Deputy General Counsel Jenna Hentoff presented proposed amendments to 205 CMR 250 for initial promulgation. *A memorandum, redline draft of 205 CMR 250, and Small Business Impact Statement were included in the Commissioners’ Packet on pages 56 through 60.*

Commissioner Skinner moved that the Commission approve the Small Business Impact Statement and the draft of 205 CMR 250 included in the Commissioners’ Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth to begin the regulation promulgation process. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. [205 CMR 149.00: Race Horse Development Fund, specifically, 205 CMR 149.04 – Discussion and Review of Regulation and Amended Small Business Impact Statement for Authorization to send to the Clerk of Senate, and Final Review and Adoption](#) (44:49)

Senior Associate General Counsel Judith Young presented proposed amendments to 205 CMR 149.04 for final approval. She explained that as this is a horse racing regulation, it was required to be filed with the clerks of the Massachusetts Senate and House for 60 days. She stated that at the close of the 60-day period, she would file the regulations with the Commonwealth, and the regulation would take effect on or after April 24, 2026. *A memorandum, redline draft of 205 CMR 149.04, and Amended Small Business Impact Statement were included in the Commissioners' Packet on pages 61 through 66.*

Executive Director of the NEHBPA Paul Umbrello stated that he joined the public hearing held on this regulation's promulgation to comment but that the meeting was closed at the time he joined. Chair Maynard asked for confirmation the public hearing was held. Senior Associate General Counsel Young stated that the hearing was held on January 13, 2026 and was presided over by Commissioner O'Brien. Interim General Counsel Justin Stempeck stated that Mr. Umbrello could send his questions to him as the public comment period and hearing, which were properly noticed, were closed.

Commissioner Skinner moved that the Commission approve the Amended Small Business Impact Statement and the draft of 205 CMR 149, specifically 205 CMR 149.04, as included in the Commissioners' Packet and discussed here today, and further, that staff be authorized to take the steps necessary to file the required documentation with the Legislature and thereafter, the Secretary of the Commonwealth to finalize the regulation promulgation process. Commissioner Brodeur seconded the motion.

Roll call vote:
Commissioner O'Brien: Aye.
Commissioner Hill: Aye.
Commissioner Skinner: Aye.
Commissioner Brodeur: Aye.
Chair Maynard: Aye.

The motion passed unanimously, 5-0.

Chair Maynard stated that the Commission would review Agenda Items 8 and 9 before returning to Item 7(c).

c. [Executive Session Minutes](#) (53:19)

Chair Maynard stated that the Commission anticipated that it would meet in executive session to review minutes from previous executive sessions as their discussion at an open meeting may frustrate the purpose for which the executive session was convened, pursuant to G.L. c. 30A, § 21(a)(7) and c. 23N, § 6(i): January 6, 2023; G.L. c. 30A, § 21(a)(7), c. 4, § 7(26)(g), and c. 23N, § 6(i): September 30, 2025; G.L. c. 30A, § 21(a)(7) and c. 4, § 7(26)(f): October 9, 2025 at 10:53 A.M.; G.L. c. 30A, § 21(a)(3), (6) and (7); and c. 4, § 7(26)(f) and (n): October 9, 2025 at 11:54 A.M.; and G.L. c. 30A, § 21(a)(3).

Commissioner Skinner moved that the Commission go into executive session for the reasons just stated by the Chair. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

Chair Maynard noted that the Commission would not reconvene the public meeting session following the executive session.

Transcriber's Note: The Commission entered executive session and did not return to the public meeting session.

8. [Commissioner Updates](#) (51:54)

Commissioner Hill stated that there were some proposed state budget changes, including that some funds were proposed to be put back into the Community Mitigation Fund. He stated that he would provide an overview of changes affecting the Commission at the next public meeting.

9. [Other Business](#) (53:04)

Hearing no other business, the Commission returned to Agenda Item 7(c).

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated January 27, 2026](#)
2. [Commissioner's Packet from the January 29, 2026, meeting](#) (posted on massgaming.com)



Massachusetts Gaming Commission
Meeting Minutes

Date/Time: February 9, 2026, 2:00 P.M.
Place: Massachusetts Gaming Commission
VIA CONFERENCE CALL NUMBER: 1-646-741-5292
PARTICIPANT CODE: 111 485 5030

The Commission conducted this public meeting remotely utilizing collaboration technology. Use of this technology was intended to ensure an adequate, alternative means of public access to the Commission’s deliberations for any interested member of the public.

Commissioners Present:

- Chair Jordan Maynard
- Commissioner Eileen O’Brien
- Commissioner Bradford Hill
- Commissioner Nakisha Skinner
- Commissioner Paul Brodeur

1. [Call to Order](#) (00:00)

Chair Maynard called to order the 580th Public Meeting of the Massachusetts Gaming Commission (“Commission”). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. [Legal Division](#) (00:36)

a. FBT Everett Realty, LLC Litigation Update

I. Executive Session

Chair Maynard stated that the Commission anticipated convening an executive session in accordance with G.L. c. 30A, §21(a)(3) to discuss strategy with respect to FBT Everett Realty, LLC v. Massachusetts Gaming Commission, as discussion at an open meeting may have a detrimental effect on the litigating position of the Commission. He stated that the public session of the Commission meeting would not reconvene at the conclusion of the executive session.

Commissioner Brodeur moved that the Commission go into executive session on the matter and for the reasons just stated by the Chair. Commissioner Hill seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

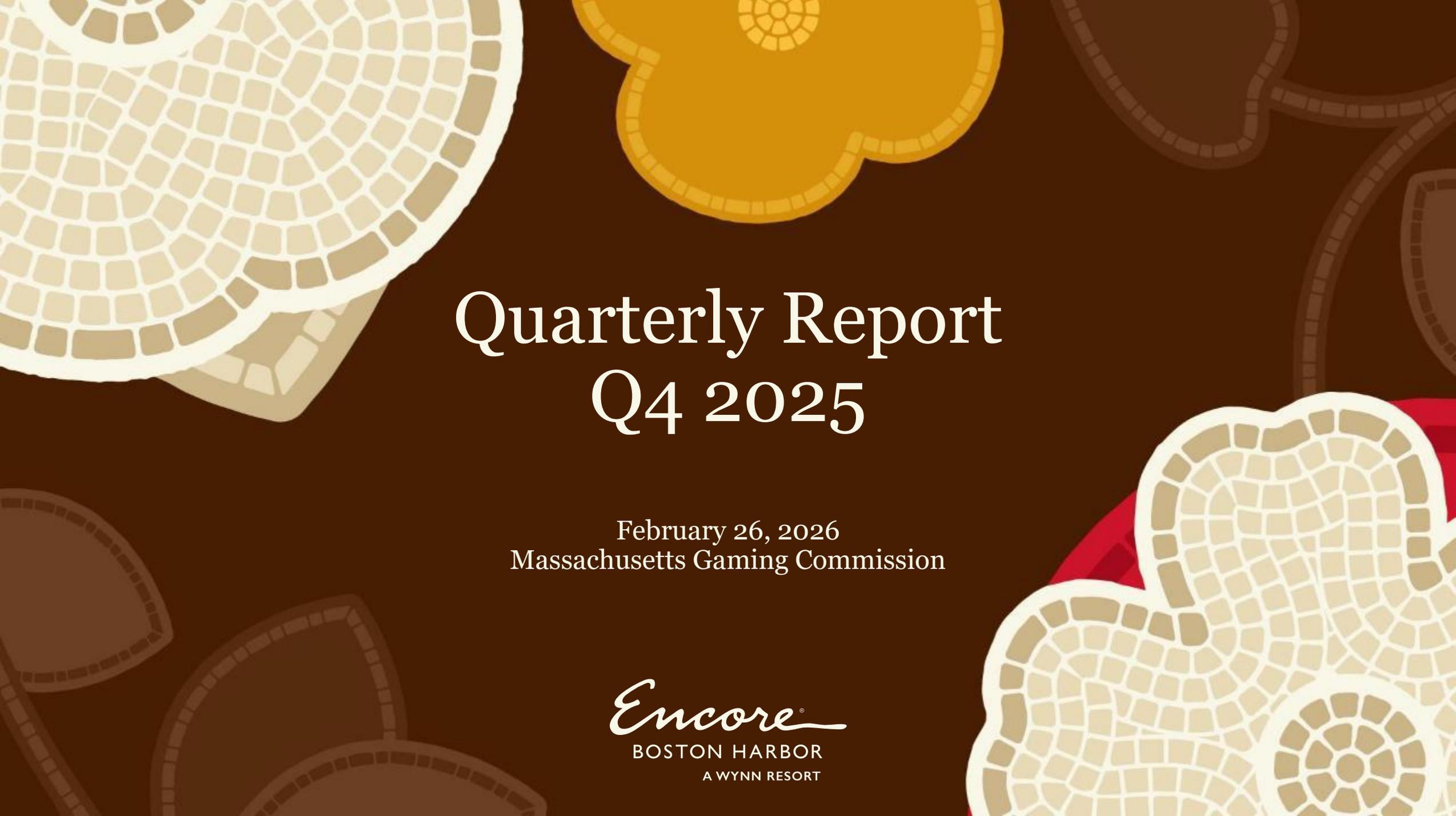
The motion passed unanimously, 5-0.

3. [Other Business](#) (01:56)

Hearing no other business, the Commission entered executive session at 2:05 P.M. and did not reconvene the public meeting session.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated February 5, 2026](#)



Quarterly Report Q4 2025

February 26, 2026
Massachusetts Gaming Commission

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Gaming Revenue, Taxes & Lottery Sales

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Gaming Revenue & Taxes: Q4 2025

Month	Slots GGR	Table Games GGR	Total GGR	State Taxes Collected
October	\$36,809,788.10	\$20,797,797.86	\$57,607,585.96	\$14,401,896.49
November	\$37,957,083.39	\$21,686,001.51	\$59,643,084.90	\$14,910,771.23
December	\$37,030,845.89	\$24,814,206.55	\$61,845,052.44	\$15,461,263.11
Total	\$111,797,717.38	\$67,298,005.92	\$179,095,723.30	\$44,773,930.83

Gaming Revenue & Taxes: Year-Over-Year

Year	Quarter	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
2024	Q1	\$91,803,193.22	\$103,968,890.63	\$195,772,084.05	\$48,943,021.01
	Q2	\$77,777,880.96	\$104,660,310.64	\$182,438,191.60	\$45,609,547.91
	Q3	\$79,846,301.53	\$104,247,558.45	\$184,093,859.98	\$46,023,465.00
	Q4	\$79,108,817.38	\$106,735,301.00	\$185,844,118.20	\$ 46,461,029.54
	Total		\$328,536,193.09	\$419,612,060.72	\$748,148,253.8
2025	Q1	\$77,646,987.06	\$106,086,032.96	\$183,733,020.02	\$45,933,255.01
	Q2	\$76,765,038.95	\$110,256,987.21	\$187,022,026.16	\$46,755,506.54
	Q3	\$72,661,542.20	\$111,649,122.65	\$184,310,664.85	\$46,077,666.22
	Q4	\$67,298,005.92	\$111,797,717.38	\$179,095,723.30	\$44,773,930.83
	Total		\$294,371,574.13	\$439,789,860.20	\$734,161,434.53

Sports Wagering Revenue & Taxes: Q4 2025

Month	Monthly Win	State Retail Taxes Collected
October	\$307,469.00	\$43,886.00
November	\$617,568.00	\$90,286.00
December	\$669,035.00	\$98,203.00
Total	\$1,594,072.00	\$232,375

Lottery Sales: Q4 2025*

Month	Lottery Sales	% Change from 2024
October	\$293,732.50	17.2%
November	\$399,203.00	-5.4%
December	\$464,693.50	48.2%
Total	\$1,157,629.00	17.4%

*The periods for which relevant sales are reported are based upon week-end totals, and may not correspond precisely to calendar month periods.

Lottery Sales: Year-Over-Year

Year	Quarter	Lottery Sales	% Change from Previous Year
2024	Q1	\$1,585,745.25	47.3%
	Q2	\$1,465,303.00	-0.1%
	Q3	\$949,657.50	-37.3%
	Q4	\$986,113.00	-32.5%
	Total	\$4,986,818.75	-9.7%
2025	Q1	\$1,027,647.50	-35.2%
	Q2	\$875,578.00	-40.2%
	Q3	\$1,207,603.00	27.2%
	Q4	\$1,157,629.00	48.2%
	Total	\$4,268,457.50	-14.4%

Workforce

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Workforce Composition

Sector	Goal	Q1 % ¹	Q1 Total # of Employees	Q2 % ²	Q2 Total # of Employees	Q3 % ³	Q3 Total # of Employees	Q4 % ⁴	Q4 Total # of Employees
Minority	40%	74%	2,137	74%	2,073	75%	2,096	75%	2,094
Veteran	3%	2%	67	2%	67	2%	68	2%	65
Women	50%	45%	1,536	45%	1,487	45%	1,500	45%	1,479
Local/Host/Surrounding Community Resident ⁵	75%	89%	3,048	89%	2,934	89%	2,959	89%	2,940
MA Residents	-	92%	3,153	92%	3,038	92%	3,062	92%	3,048
Total Number of Employees⁶									
			3,419		3,299		3,324		3,302
Full-time			2,394		2,327		2,330		2,322
Part-time			1,025		972		994		980
On-call			0		0		0		0

1. All Q1 figures are as of April 1, 2025. The total number of employees that did not specify their minority status during Q1 was 531.
2. All Q2 figures are as of July 1, 2025. The total number of employees that did not specify their minority status during Q2 was 512.
3. All Q3 figures are as of October 1, 2025. The total number of employees that did not specify their minority status during Q3 was 517.
4. All Q4 figures are as of January 1, 2026. The total number of employees that did not specify their minority status during Q4 was 514.
5. "Local/Host/Surrounding Community Residents" include residents from communities within thirty (30) miles of Encore Boston Harbor.
6. Please note that an employee may fall into more than one sector (e.g., minority and local) and, as such, totals may not be reflective of the sum of previous columns.

Workforce Composition: Employees Supervisory & Above

	Minority	Women	Veteran	Total Head Count (including non-minority employees)
ALL EMPLOYEES				
Number of Employees	2,094	1,479	65	3,302
% Actual	75%	45%	2%	
MANAGER AND ABOVE				
Number of Employees	75	75	9	196
% Actual	41%	38%	5%	
SUPERVISORS AND ABOVE				
Number of Employees	303	226	16	563
% Actual	60%	40%	3%	

Operating Spend

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A WYNN RESORT



Operating Spend¹: Diversity

Diversity Category	Annual Goal	Q1 %	Q1 Spend	Q2 %	Q2 Spend	Q3 %	Q3 Spend	Q4%	Q4 Spend
MBE Vendor Spend	8%	11%	\$2,200,395.09	13%	\$2,453,590.78	13%	\$2,414,182.20	14%	\$2,691,933.11
VBE Vendor Spend	3%	0%	\$49,791.50	0%	\$23,994.37	0%	\$63,934.56	0%	\$28,536.45
WBE Vendor Spend	14%	18%	\$3,642,371.19	22%	\$4,058,258.26	18%	\$3,401,202.44	13%	\$2,454,850.87
Total Diverse Spend	25%	29%	\$5,892,557.78	35%	\$6,535,843.41	31%	\$5,879,319.20	27%	\$5,175,320.43

¹ All spend figures referenced herein are based upon Encore Boston Harbor's Q4 discretionary spend amount of **\$18,894,292.44**.

Operating Spend¹: Diversity (Year-Over-Year)

Quarter	2024	2025
1	\$6,240,257.90	\$5,892,557.78
2	\$4,907,520.62	\$6,535,843.41
3	\$5,055,228.17	\$5,879,319.20
4	\$4,788,053.80	\$5,175,320.43
Total	\$20,991,060.49	\$23,483,040.82

Operating Spend: Local

Local Vendor Spend	Goal	Q1 %	Q1 \$	Q2 %	Q2 \$	Q3 %	Q3 \$	Q4 %	Q4 \$
Boston	\$20,000,000.00	16%	\$3,181,764.66	14%	\$2,652,995.29	13%	\$2,396,090.17	11%	\$2,000,244.82
Chelsea	\$2,500,000.00	2%	\$417,744.32	2%	\$368,179.75	2%	\$351,155.06	2%	\$340,504.12
Everett	\$10,000,000.00	10%	\$2,037,222.02	11%	\$2,074,839.63	12%	\$2,232,293.06	12%	\$2,259,819.44
Malden	\$10,000,000.00	1%	\$128,455.14	1%	\$97,378.58	0%	\$77,968.93	1%	\$119,124.88
Medford	\$10,000,000.00	2%	\$440,125.01	13%	\$314,244.85	2%	\$424,520.25	1%	\$210,135.31
Somerville	\$10,000,000.00	5%	\$944,592.02	4%	\$826,142.91	4%	\$805,847.81	3%	\$619,198.75
MA Vendor Spend	N/A	57%	\$11,451,079.68	59%	\$10,922,467.71	60%	\$11,530,129.41	65%	\$12,237,894.26

Operating Spend: Local* (Year-Over-Year)

Quarter	2024	2025
1	\$7,449,883.38	\$7,149,903.17
2	\$7,092,190.85	\$6,333,781.01
3	\$6,192,949.01	\$6,287,875.28
4	\$7,032,010.17	\$5,549,027.32
Total	\$27,767,033.41	\$25,320,586.78

*The local spend figures provided in this chart exclude the total spend for MA which is addressed in the next slide.

Operating Spend: MA (Year-Over-Year)

Quarter	2024	2025
1	\$12,357,812.75	\$11,451,079.68
2	\$10,950,982.50	\$10,922,467.71
3	\$9,899,870.85	\$11,530,129.41
4	\$10,492,394.04	\$12,237,894.26
Total	\$43,701,060.14	\$46,141,571.06

Compliance

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Compliance: Minors¹ Prevented from Gaming²

Month	Minors Intercepted on Gaming Floor and Prevented from Gaming	Minors Intercepted Gaming	Minors Intercepted at Slot Machines	Minors Intercepted at Table Games	Minors Intercepted Consuming Alcohol	Number of IDs NOT Checked that Resulted in Minor on Gaming Floor	Number of Fake IDs Provided by Minors that Resulted in Minor on Gaming Floor	Numbers of Minors on Gaming Floor Under 18 Years of Age
October	0	0	0	0	0	0	0	0
November	0	0	0	0	0	0	0	0
December	2	1	1	0	2	1	2	0
Total	2	1	1	0	2	1	2	0

¹ A “minor” is defined as a person under 21 years of age, provided however, that the last column of the above specifically refers to persons under 18 years of age.

² Please note that no minors were intercepted or found to be engaged in any sports wagering during Q4.

- The average length of time spent by a minor on the casino floor was 11 minutes.
- The longest length of time spent by a minor on the casino floor was 44 minutes.
- The shortest length of time spent by a minor on the casino floor was 9 minutes.

People & Culture Initiatives

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Annual Compliance Training



Annual Compliance training launched on October 9, 2025.



This training is mandatory for all employees and is designed to give employees the tools, knowledge, and confidence to make the right decisions at work. Compliance is a shared responsibility that is engrained in our culture, our Values, and our Behaviors – it's quite simply about doing what's right and being respectful to others.



To promote and support the completion of this important training, all eligible employees who completed their 2025 Annual Compliance Training by Friday, October 31 were entered into a drawing to win one of 25 prizes. The drawing was held on November 7.

Open Enrollment & Benefits Fair

The Annual Benefits Fair was held in November, giving employees the opportunity to learn about all of the benefits available to them and ask questions.



Veterans Day

In honor of Veterans Day, all employees who are active military/veterans who wanted to participate had a photo of them displayed in the BOH.

Displayed in Le Staff was Fallen Comrade Table to honor all those who have served and are no longer with us.



Annual Employee Gift Giveaway

The Annual Employee Gift Giveaway was held in December. Each employee received a choice between a branded bathrobe or branded cooler.



Promotions, Marketing, Special Events & Volunteerism

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New Years Eve 2025 - Yacht Rock Celebration



TRU Contributions: Q4 2025

Charitable Organization	Dollar Amount	Number of Tickets
Everett Citizens Foundation	\$8,364.84	64,807
Massachusetts Fallen Heroes	\$26,423.37	110,943
MSPCA-Angell	\$25,611.27	108,348
Wynn Resorts Foundation	\$9,712.67	68,095
Total	\$70,112.15	352,193

Community Relations Highlights - 2025



- During 2025, EBH employees volunteered 10,555 hours of their time to a number of organizations, including by participating in 116 EBH sponsored events.
- During 2025, employees, vendors and volunteers packed 1,191,978 meals during its Feed the Funnel Events – this is the highest meal count for any organization in the US.
- EBH finished the year with our second annual Holiday Market Sale where EBH raised \$155,794 in sales for the Wynn Resorts Foundation. With the company match, the total contribution from the sale was \$396,970.





Questions?



PLAINRIDGE PARK

Q4 2025 REPORT



RETAIL SPORTS WAGERING REVENUE AND TAXES

Year	Quarter	Net Sports Wagering Revenue	Sports Wagering Taxes
2024	Q1	\$1,026,537	\$153,981
	Q2	\$84,399	\$40,705
	Q3	\$938,110	\$140,717
	Q4	\$198,812	\$60,055
	Total	\$2,247,858	\$395,458
2025	Q1	\$575,358	\$86,304
	Q2	\$641,653	\$96,248
	Q3	\$705,081	\$105,762
	Q4	\$1,219,470	\$182,921
	Total	\$3,141,561	\$471,234

In addition to the Retail Sportsbook, Plainridge Park has 20 sports wagering kiosks.



GAMING REVENUE AND TAXES

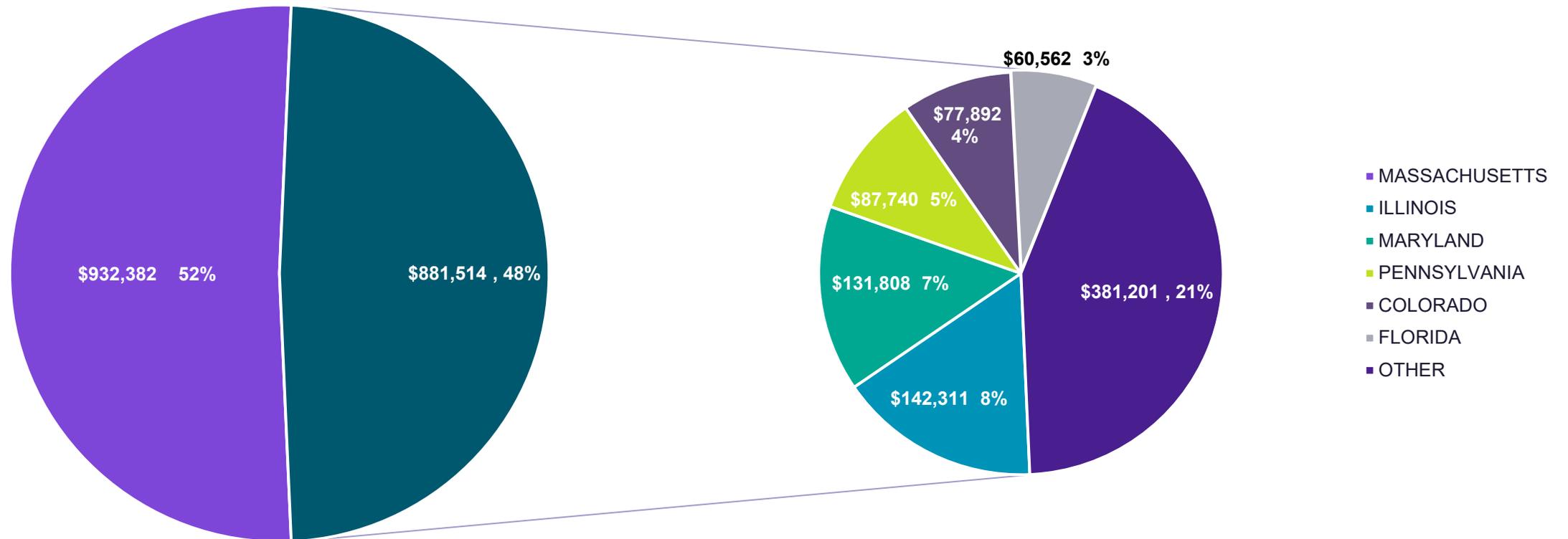
Year	Quarter	Net Slot Revenue	State Taxes	Race Horse Taxes	Total Taxes
2024	Q1	\$40,478,391	\$16,191,357	\$3,643,055	\$19,834,412
	Q2	\$42,015,386	\$16,806,154	\$3,781,385	\$20,587,539
	Q3	\$42,539,918	\$17,015,967	\$3,828,593	\$20,844,560
	Q4	\$43,493,668	\$17,397,467	\$3,914,430	\$21,311,898
	Total	\$168,527,363	\$67,410,945	\$15,167,463	\$82,578,409
2025	Q1	\$43,494,439	\$17,397,776	\$3,914,500	\$21,312,275
	Q2	\$46,342,475	\$18,536,990	\$4,170,823	\$22,707,813
	Q3	\$44,716,034	\$17,886,414	\$4,024,443	\$21,910,857
	Q4	\$43,807,743	\$17,523,097	\$3,942,697	\$21,465,794
	Total	\$178,360,691	\$71,344,277	\$16,052,462	\$87,396,739

LOTTERY SALES

Quarter	2025	2024	\$ Difference	% Difference
Q1	\$644,925	\$618,943	\$25,982	4.20%
Q2	\$615,801	\$628,352	(\$12,551)	-2.00%
Q3	\$666,543	\$611,190	\$55,354	9.06%
Q4	\$661,504	\$600,610	\$60,894	10.14%
Total	\$2,588,773	\$2,459,095	\$129,679	5.27%

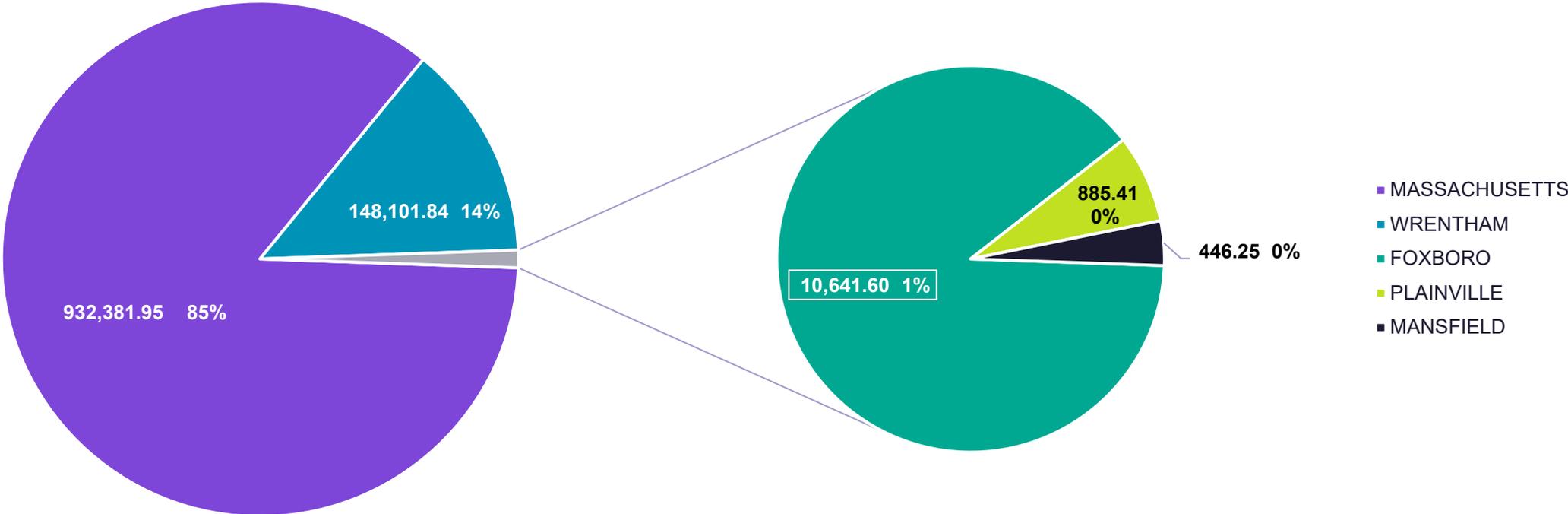
SPEND BY STATE

Q4 2025 Total Qualified Spend By State



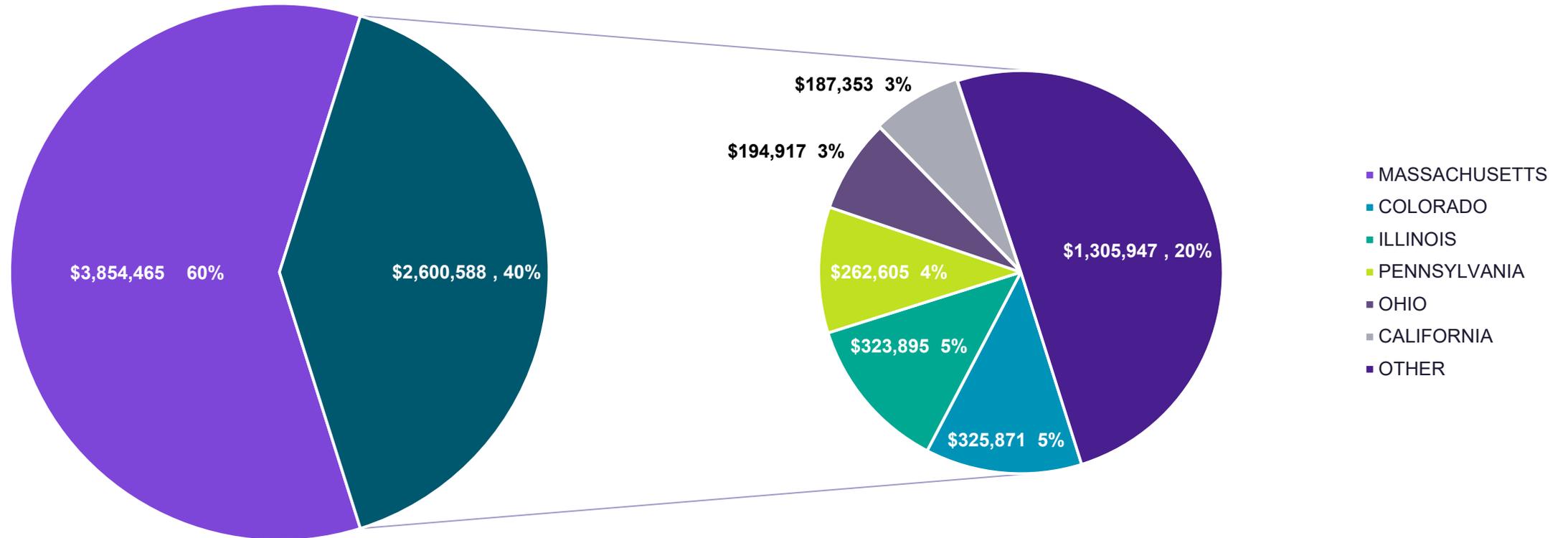
LOCAL SPEND

Q4 2025 Massachusetts vs Host & Surrounding Community Qualified Spend



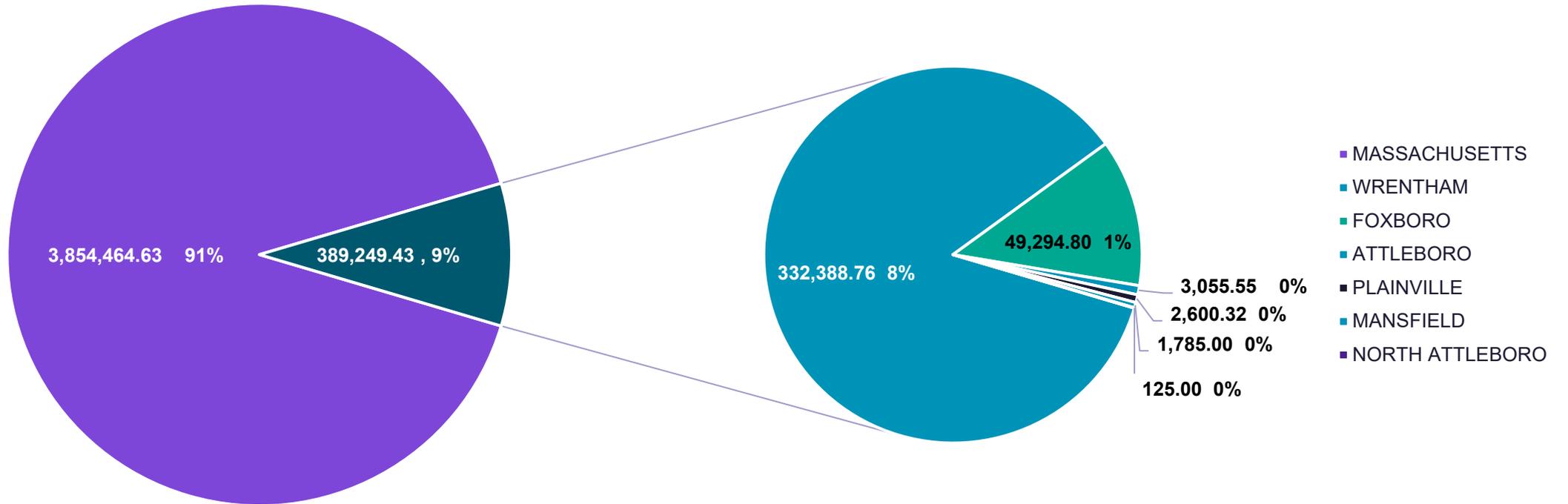
2025 YEAR END SPEND BY STATE

Year End 2025 Total Qualified Spend By State



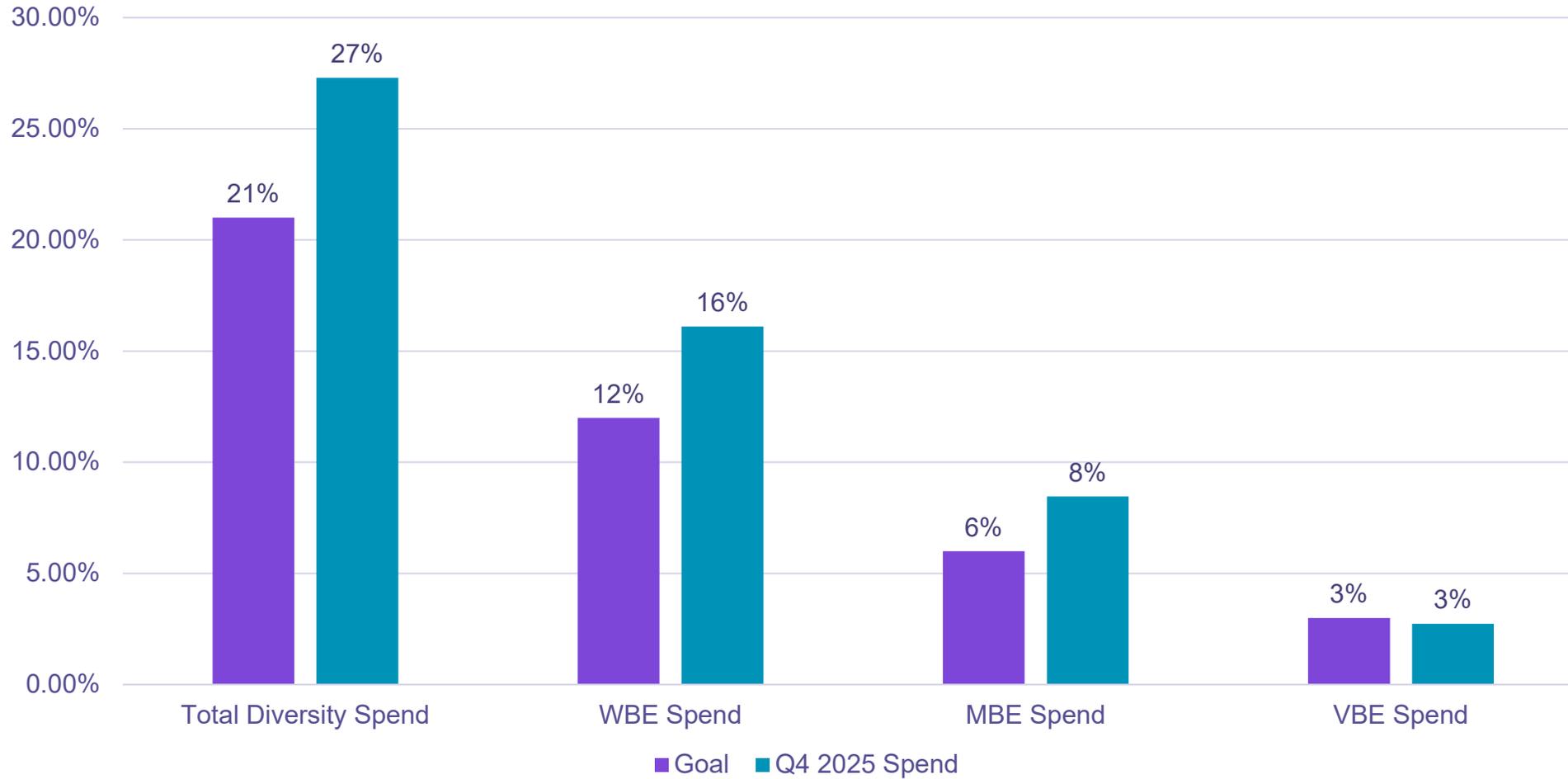
2025 YEAR END LOCAL SPEND

Year End 2025 Massachusetts vs Host & Surrounding Community Qualified Spend



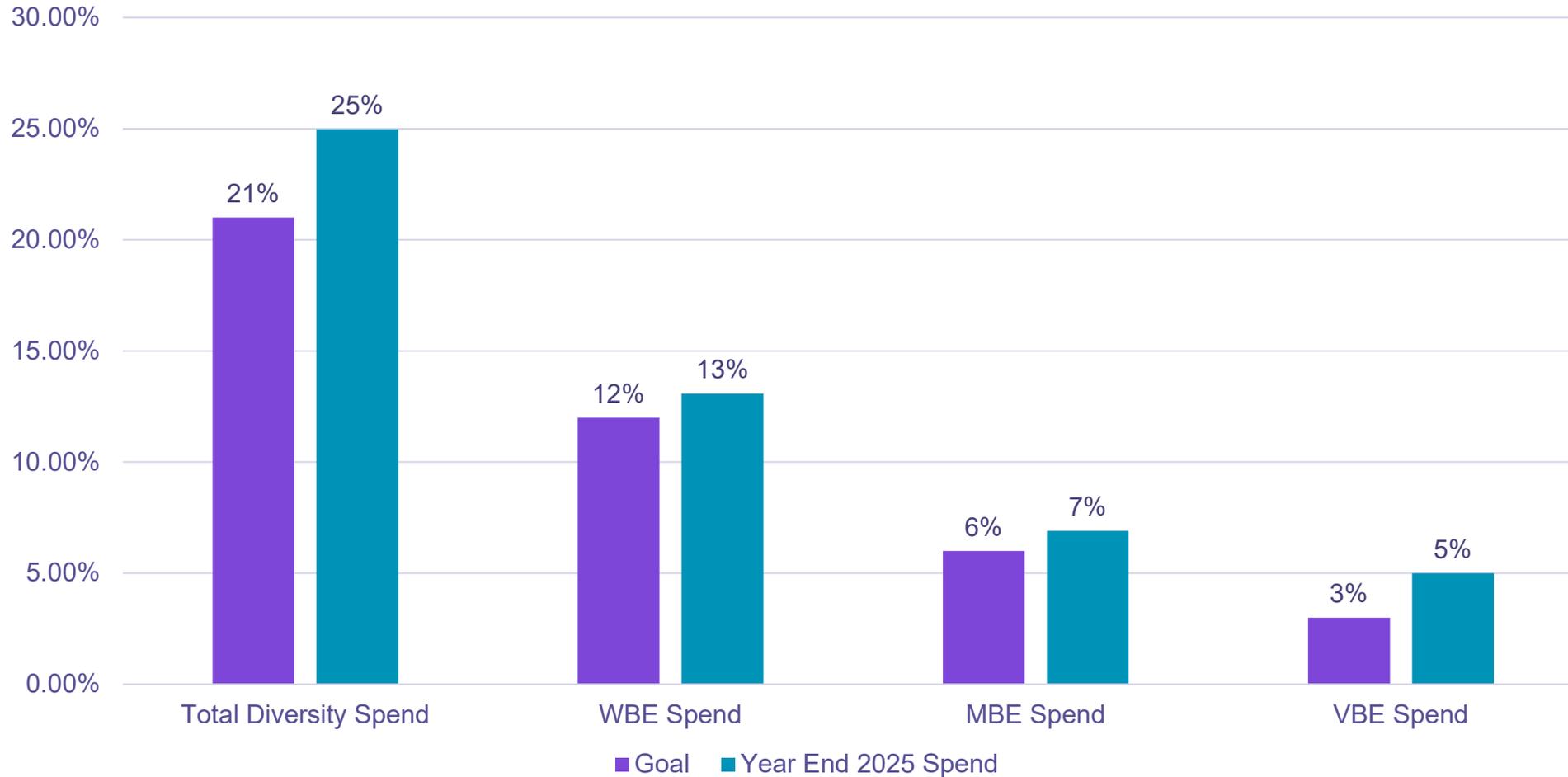
VENDOR DIVERSITY

Q4 2025 vs Goal



2025 YEAR END VENDOR DIVERSITY

Year End 2025 vs Goal



DIVERSE SPEND

Category ¹	Q4 2025	Q3 2025	\$ Difference	% Difference
WBE	\$292,135	\$177,030	\$115,105	65.02%
MBE	\$153,413	\$120,533	\$32,880	27.28%
VBE	\$49,569	\$101,985	(\$52,416)	(51.40%)
Total Diverse Spend	\$495,117	\$399,547	\$95,570	23.92%
Qualified Spend	\$1,813,896	\$1,730,605	\$83,291	4.81%

¹ Includes vendors that are certified in multiple diversity categories. Spend is reported in all qualified categories.

2025 YEAR END DIVERSE SPEND

Category ¹	2025	2024	\$ Difference	% Difference
WBE	\$844,386	\$676,025	\$168,361	24.90%
MBE	\$445,711	\$423,725	\$21,986	5.19%
VBE	\$322,603	\$318,962	\$3,641	1.14%
Total Diverse Spend	\$1,612,700	\$1,418,714	\$193,986	13.67%
Qualified Spend	\$6,511,635	\$5,734,181	\$777,454	13.56%

¹ Includes vendors that are certified in multiple diversity categories. Spend is reported in all qualified categories.

COMPLIANCE

Month	Prevented from Entering Gaming Establishment			Expired, Invalid, No ID	Fake ID	Weapons Detected	Minors & Underage Escorted from the Gaming Area	Minors & Underage found Gaming at Slot Machines	Minors & Underage Escorted from the Sports Wagering	Minors & Underage found Sports Wagering	Minors & Underage Consuming Alcoholic Beverages
	Total	Minors ¹	Underage ²								
October	43	15	6	20	0	2	0	0	1	0	0
November	29	3	11	11	0	4	0	0	0	0	0
December	28	1	10	16	0	1	0	0	0	0	0
Total	100	19	27	47	0	7	0	0	1	0	0

¹ Person under 18 years of age

² Person 18-21 years of age



EMPLOYMENT¹: ALL EMPLOYEES²

Employee Category	Percentage Goal	Total # of Employees in Category	Q4-25 Actual Percentage of Total Employees	Q3-25 Actual Percentage of Total Employees
Diversity	15%	142	33%	33%
Veterans	2%	15	3%	3%
Women	50%	210	46%	48%
Local ³	35%	133	29%	29%
MA Employees		258	57%	57%

¹ All employees referenced in this slide were current as of Q4 2025

² Total number of employees Q4 2025: 452

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

	Employees	Full-Time	Part-Time	Seasonal
Total	452	287	165	0
% of Total	100%	63%	37%	0%

EMPLOYMENT¹: SPORTSBOOK²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	1	14%
Veterans	0	0%
Women	5	36%
Local ³	4	29%
Full-Time	8	57%

¹ All employees referenced in this slide were current as of Q4 2025: 452

² Total number of **Sportsbook employees (does not include Sports restaurant employees)** Q4 2025: 14

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

EMPLOYMENT¹: SUPERVISOR AND ABOVE²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	14	17%
Veterans	4	5%
Women	29	36%

¹ All employees referenced in this slide were current as of Q4 2025

² Total number of Supervisor and Above Q4 2025: 81



PPC CARES

OUR DEVELOPMENT - Q4, 2025



CREATING OUTSTANDING LEADERS

To invest in the professional and personal development of TEAM MEMBERS by providing exposure to diverse perspectives and experiences, fostering growth and purpose-driven leadership, and promoting self-esteem and confidence in our team members.

MA Co



PPC: MANAGERS MEETING HOLIDAY EXCHANGE



PPC: CPR CERTIFICATION



PENN WOMEN: BOOK READING



PENN WOMEN: PURPLE BAG PROJECT



PPC: NEW HIRES ROBERT ROSE - SURVEILLANCE



PPC: FINANCIAL FAIR



ACES OF PENN: TEAM MEMBERS OF THE QUARTER



PPC CARES

OUR TEAM - Q4 2025



ENGAGED TEAM MEMBERS

To provide training, work environments, events, activities for TEAM MEMBERS to stay motivated, creative, and work well together to achieve shared goals. Our leaders should inspire team members that are eager to learn and grow, and feel valued for their feedback.



PPC: TREE DECORATING



PPC: COOKIE CONTEST



PPC: THANKSGIVING PIE CONTEST



PPC: THANKSGIVING



PPC: DECK THE DOOR CONTEST



PPC: HALLOWEEN CONTEST



PPC: DESK DECORATING CONTEST



PPC: MINI HOLIDAY TREE CONTEST



PPC CARES

OUR COMMUNITY - Q4 2025



PARTNERING SUCCESS

Working collaboratively with our community partners and TEAM MEMBERS to help mobilize resources and influence systems. Our team members will dedicate resources such as time, funding, and people with the necessary skills to enhance the mission of our community partners.



PPC: VETERANS DAY BUCKET GIVEAWAY



PPC: VETERANS DAY BUCKET GIVEAWAY



PPC: HOLIDAY HEAT



PPC: HOLIDAY HEAT



AMERICAN CANCER SOCIETY: FUNDRAISER



BOSTON PEARL FOUNDATION: HOLIDAY PARTY



PPC: HOLIDAY SIP & SHOP



HOCKOMOCY AREA YMCA TOY DRIVE



PPC: SIP & SHOP



PPC: SIP & SHOP



Q4 2025 Report Massachusetts Gaming Commission

February 26, 2026

Revenue, Taxes, Lottery & Spend Update

MGM Springfield Q4 2025

Q4 2025 Gaming Revenue & Taxes

Month	Gaming Revenue	MA Taxes
October	\$24,096,979	\$6,024,245
November	\$24,555,146	\$6,138,786
December	\$21,921,738	\$5,480,435
Total	\$70,573,862	\$17,643,466

2025 YOY Gaming Revenue & Taxes

Year	Quarter	Table Games Revenue	Slots Gaming Revenue	Total Gaming Revenue	MA Taxes
2024	Q1	\$13,966,721	\$54,936,465	\$68,933,186	\$17,233,296
	Q2	\$12,978,593	\$54,139,847	\$67,118,440	\$16,779,610
	Q3	\$14,226,647	\$53,918,082	\$68,184,729	\$17,046,182
	Q4	\$12,788,884	\$55,123,010	\$67,911,894	\$16,977,973
	Total	\$54,030,844	\$218,117,404	\$272,148,248	\$68,037,062
2025	Q1	\$12,906,917	\$56,317,096	\$69,224,013	\$17,306,003
	Q2	\$13,317,810	\$58,486,348	\$71,804,159	\$17,951,040
	Q3	\$13,895,059	\$57,277,469	\$71,172,528	\$17,793,132
	Q4	\$12,638,230	\$57,935,632	\$70,573,862	\$17,643,466
	Total	\$52,758,017	\$230,016,545	\$282,774,562	\$70,693,641

Q4 2025 Sports Wagering Revenue



Month	Taxable Revenue	Taxes
October	(\$14,304)	\$0
November	\$162,524	\$24,379
December	\$251,864	\$37,780
Total	\$400,084	\$62,159

Month	Taxable Revenue	Taxes
October	\$3,563,664	\$712,733
November	\$6,635,939	\$1,327,188
December	\$5,508,187	\$1,101,637
Total	\$15,707,790	\$3,141,558

Q4 2025 Lottery

Month	Lottery Sales	% Change from Previous Year
October	\$197,968	65%
November	\$199,804	(1%)
December	\$187,787	34%
Total	\$585,559	27%

2025 YOY Lottery Sales

Year	Quarter	Lottery Sales	% Change from Previous Year
2024	Q1	\$414,543	-
	Q2	\$347,063	-
	Q3	\$410,768	-
	Q4	\$461,933	-
	Total	\$1,634,307	-
2025	Q1	\$399,038	(4%)
	Q2	\$438,285	26%
	Q3	\$557,388	36%
	Q4	\$585,559	27%
	Total	\$1,980,271	19%

Q4 2025 Diversity Spend

Diversity Category	Annual Goal	Q4%	Q4 Spend
MBE Vendor Spend	10%	4%	\$263,159
VBE Vendor Spend	2%	2%	\$167,714
WBE Vendor Spend	15%	9%	\$653,868
Total	27%	15%	\$1,084,741

2025 Local Spend

Diversity Category	Q4%	Q4 \$
Local* Vendor Spend	35%	\$2,372,286
MA Vendor Spend	43%	\$2,926,219

Note: Total Biddable Spend excludes gaming vendors, utilities, insurance, banking fees/services, and other expenses outlined within the American Gaming Association Diversity Spending Exclusion List (MGM Springfield Diversity and Affirmative Junketing Program - Appendix D).

*Local Vendor Spend includes Springfield, Surrounding Communities and Western Massachusetts.

Q4 Procurement Efforts

Q4 Procurement Events:

- 9/25 NEPM Show presented by CWE
- 11/12 Reader Raves WBE Recognition with Park Cleaners
- 11/13 GNEMSDC Awards
 - Justin Glinski – Buyer of the Year Winner
 - Wynter Hawkins – Advocate of the Year Winner



Compliance

MGM Springfield Q4 2025

Q4 2025 Compliance

Month	Minors intercepted in Gaming Area and prevented from Gaming	Compared to 2024	# Change	Minors intercepted gaming	Compared to 2024	# Change	Minors intercepted consuming alcohol	Compared to 2024	# Change
Oct	1	6	-5	1	1	0	0	0	0
Nov	3	12	-9	5	2	3	1	0	1
Dec	3	12	-9	2	2	0	0	1	-1

- Longest time in Gaming Area – 40 minutes
- Shortest time in Gaming area – 2 minutes
- Two underage across the quarter, were under 18, the rest were between the ages of 18 – 20.

Employment

MGM Springfield Q4 2025

2025 Employment Numbers

2025	Goals	Q1 2025 %	Q1 2025 Total # of Employees	Q2 2025 %	Q2 2025 Total # of Employees	Q3 2025 %	Q3 2025 Total # of Employees	Q4 2025 %	Q4 2025 Total # of Employees
Minority	50%	52%	804	53%	821	54%	842	54%	887
Veteran	2%	4%	68	5%	73	5%	74	5%	73
Women	50%	41%	639	41%	636	40%	634	40%	655
Springfield Residents	35%	37%	575	39%	604	40%	620	40%	646
Western MA Residents	-	75%	1,165	75%	1,171	76%	1,184	76%	1,241
MA Residents	-	77%	1,190	77%	1,198	77%	1,210	78%	1,267
Total # Of Gaming Establishment Employees*	-		1,546		1,553		1,568		1,632
Full Time	-		984		974		979		990
Part Time	-		314		328		334		386
On Call	-		248		251		255		256

- MGM Springfield Sportsbook currently employs 11 team members.

Q4 2025 Workforce & Hiring Initiatives

Continued Property Tours and Presentations to Students of:

- Holyoke Community College (HCC) Hotel Certification Program

Career Fairs at:

- YMCA of Greater Springfield
- Holyoke Community College

Workforce Development:

- UMass Hospitality & Tourism Leadership Panel
- Dress For Success “Transferrable Skills” workshop
- Holyoke Community College (HCC) Hotel and Culinary program presentations
- UMass Casino Management class presentation
- Nourish-Your-Career student showcase



Community Outreach & Special Events

MGM Springfield Q4 2025

Q4 2025 Community Outreach & Special Events



Veterans Flagging



Toys for Tots



The Gray House



Mayflower Marathon



Springfield Open Pantry

Q4 2025 Community Outreach & Special Events



YMCA of Greater Springfield



Rays of Hope Walk



Square One Craft Event



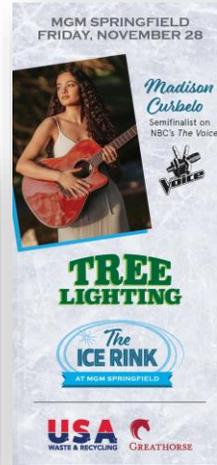
Festival of Trees



Q4 2025 Community Outreach & Special Events



United Way Grocery Event



Annual Tree Lighting and Ice Rink Opening



Square One Donation



Latin American Heritage Month
Restaurant Rebrand



Spirit of Springfield Bright Nights Ball



Q4 2025 Community Outreach

Partnered with Hunger Relief Organizations:

- Served over 1800 meals to local homeless
- Distributed hundreds of grocery bags with the United Way
- MGM Property Executives supported food sorting at the Springfield Open Pantry
- Collected over \$262,000 in cash and nonperishables for the Springfield Open Pantry ('25 Mayflower Marathon)
 - Hosted at MGM Springfield
 - Record-breaking Year

Proud Community Sponsors:

- Rays of Hope Cash and Water Sponsor
- Link to Libraries Donation
- Square One Donation
- YMCA of Greater Springfield Donation
- Collected 800+ toys for Toys for Tots of Western Massachusetts
- Spirit of Springfield Bright Nights Ball Sponsor
- Property Certificates for 501(c)3 Raffle Prizes
- Golf Tournament Raffle Donation Springfield Boys and Girls Club

2025 Philanthropic Totals:

- 3,416 total community volunteer hours
- 16.3% Property Volunteer Participation



Entertainment

MGM Springfield Q4 2025

Entertainment at MassMutual Center



OCT 18TH
11 am - 2pm

**DOWNTOWN
SPRINGFIELD**

HARVEST FESTIVAL

FREE ADMISSION | FUN FOR ALL AGES

PRESENTED BY: 

SPRINGFIELD DOWNTOWN THE LANDING

MassMutual Center MASSACHUSETTS CONVENTION CENTER AUTHORITY Western Mass SPRINGFIELD CULTURAL PARTNERSHIP



25th

SPRINGFIELD BOYS & GIRLS CLUB

Festival of Trees

November 28 - December 14

WED. DECEMBER 10 2025 ★ MASSMUTUAL CENTER



CLASSIC
SPRINGFIELD, MASSACHUSETTS

BIRTH PLACE

UMASS VS BOSTON COLLEGE

YALE VS ALBANY



JURASSIC QUEST

BRICK FEST LIVE

YOU'RE GONNA NEED A BIGGER WEEKEND

TWO EPIC FAMILY EVENTS

JANUARY 9-11 | WWW.JURASSICQUEST.COM



THE 100 YEAR TOUR

HARLEM GLOBETROTTERS
1926 100 2025
World's Finest

MASSMUTUAL CENTER | DEC 29
SPRINGFIELD, MA



MassMutual Center
SPRINGFIELD, MA

MONSTER X TOUR

FEEL THE XTREME

MONSTER TRUCKS & FREESTYLE MOTOCROSS!!

JANUARY 16TH AND 17TH
2 BIG SHOWS!

Tickets on Sale NOW! More Info visit MonstercXTour.com

Upcoming Entertainment at MassMutual Center

THE FUTURE OF TCG IS HERE

COSPLAY EVENT
Sun, 11 AM



Featuring:
Voice Actor
Meet & Greet,
Trading Card
Vendors,
Artist Alley,
& Vendor Hall

10 AM - 3 PM General Admission
Sat & Sun | March 14-15, 2026
VIP 9 AM Saturday Only

MASSMUTUAL CENTER
TCG & Collectibles Tradeshow SPRINGFIELD, MA
Get Your Tickets At: MASSMUTUALCENTER.COM



SPRINGFIELD
THUNDERBIRDS

VS.  **PROVIDENCE BRUINS** WED. MAR. 11 | @6:05PM

DROPKICK MURPHYS
POST GAME CONCERT

in partnership with  MassMutual Center

 SPECIALTY JERSEY GAME

SEASON PRESENTED BY  MGM



Disney ON ICE
presents
FROZEN & ENCANTO

MAR 19 - 22

MERCYME



The Wonder & Awe TOUR

WITH **TIM TIMMONS + SAM WESLEY**

MARCH 26
SPRINGFIELD, MA
MASSMUTUAL CENTER

ONTOUR TPR. TICKETS AVAILABLE AT MERCYME.ORG



AMERICAN GOLD

STARS ON ICE
2026 TOUR
MASSMUTUAL CENTER
APRIL 28
starsonice.com

WE HOST CHAMPIONS! SPRINGFIELD, MA



DI MEN'S HOCKEY REGIONAL

 2027

Q4 Entertainment at MGM Springfield & Symphony Hall



EDDIE GRIFFIN
OCT 4



ARIA BALLROOM

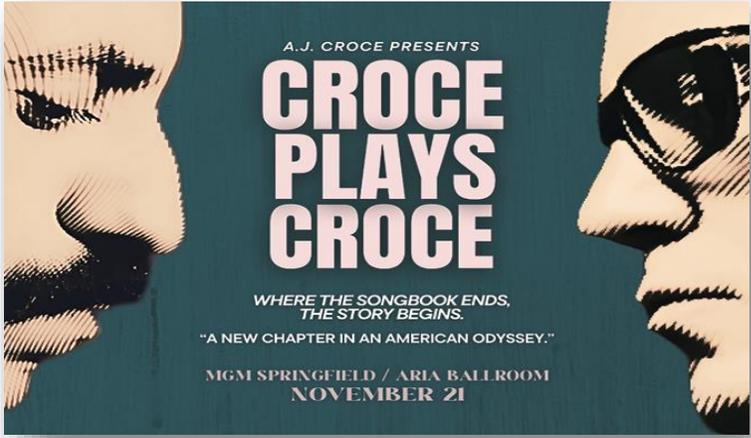
Air Supply Est. 1975
50TH ANNIVERSARY CELEBRATION
SATURDAY
NOVEMBER 15
SYMPHONY HALL



A.J. CROCE PRESENTS
CROCE PLAYS CROCE

WHERE THE SONGBOOK ENDS,
THE STORY BEGINS.
"A NEW CHAPTER IN AN AMERICAN ODYSSEY."

MGM SPRINGFIELD / ARIA BALLROOM
NOVEMBER 21



AN ALL-NEW LIVE ACROBATIC MUSICAL HOLIDAY EXPERIENCE

CIRQUE MUSICA
HOLIDAY WONDERLAND
DECEMBER 4
SYMPHONY HALL



TCG



12 DAYS OF CHRISTMAS TOUR

Christmastime
WITH
TRISHA YEARWOOD

Saturday, December 6
SPRINGFIELD SYMPHONY HALL

featuring  SPRINGFIELD SYMPHONY ORCHESTRA

COMING SOON 



 DECEMBER 6

DECEMBER 21, 2025

Aaron LEWIS
and the **STATLINERS**
AMERICAN AS IT GETS
12.21.2025




SYMPHONY HALL
SPRINGFIELD

PRESENTED BY


Upcoming Entertainment at MGM Springfield



CHelsea
HANDLER
THE HIGH AND MIGHTY TOUR

MARCH 29
SYMPHONY HALL

MARCH 29

S
SYMPHONY HALL
SPRINGFIELD

A promotional poster for Chelsea Handler's 'The High and Mighty Tour'. It features a photograph of Chelsea Handler with her hands clasped under her chin, set against a vibrant, multi-colored mandala background. The text is arranged in a clean, modern font, with the date and venue information clearly displayed.



LITTLE RIVER BAND

LRB

FIFTY YEARS

LITTLE RIVER BAND
FEB 28

MGM
SPRINGFIELD

ARIA BALLROOM

A promotional poster for the Little River Band's 50th anniversary. The design is split into two vertical panels. The left panel features a large, gold-colored circular logo with 'LRB' in the center and 'FIFTY YEARS' on a banner below it. The right panel is black with white text announcing the band's performance on February 28 at the MGM Springfield Aria Ballroom. The MGM logo is also present.



MICHAEL CARBONARO
WONDERBOY
ALL-NEW MAGIC. ALL-NEW MISCHIEF. ALL SUPERPOWERED.
FRIDAY, MARCH 6
ARIA BALLROOM · MGM SPRINGFIELD

A promotional poster for Michael Carbonaro's 'Wonderboy' magic show. It features a photograph of Michael Carbonaro holding a glowing orb of light. The text is bold and eye-catching, with the date and venue information clearly stated.



BRIT FLOYD

"THE WORLD'S PREMIER PINK FLOYD EXPERIENCE"
.. Rolling Stone

MARCH 8
SYMPHONY HALL

MGM
SPRINGFIELD

AND THE MOON WALL AND BEYOND

A promotional poster for Brit Floyd's Pink Floyd tribute show. The background is a dark, textured wall of bricks, with a Union Jack flag and a rainbow flag visible. The text is white and stands out against the dark background, announcing the performance on March 8 at the MGM Springfield Symphony Hall.



Thank you



TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Andrew Steffen – Compliance Operations Manager, Sports Wagering

MEMO: 1/30/2026
MEETING: 2/26/2026

RE: Update to Penn Sports Interactive House Rules

REGULATION BACKGROUND:

Pursuant to [205 CMR 247.02\(4\)](#), a Sports Wagering Operator shall not change or modify the House Rules without prior written approval of the Commission.

EXECUTIVE SUMMARY:

Penn Sports Interactive (“PSI”) has requested changes to their Massachusetts online sportsbook house rules. A full detailed summary of changes can be found in the attached redline exhibit.

The summary of changes is as follows:

1. **General Rules:** Slight settlement clarification to Same Game Parlays and Draft markets and props.
2. **Baseball:** Clarifications to player prop participation rules by removing MLB All-Star Game specifics and standardizing criteria for pitchers and position players; enhanced Same Game Parlay grading to include recalculated odds for pushes or voids without losses.
3. **Basketball:** Removal of exclusions in regular season player props, refinements to overtime inclusion and two-legged ties, added player participation definitions for quarters/halves, splits, adjustments to possession and attempt/type markets for blocked



Sports Wagering Division

shots; introduced recalculated odds for pushes/voids in Same Game Parlays.

4. **Football:** Streamlined player prop participation to require at least one snap for action; refinements to in-play team drive markets including removal of exclusions, updated grading for blocked punts/field goals; clarified player touchdown crediting on drives; added recalculated odds for pushes/voids in Same Game Parlays.
5. **Ice Hockey:** Introduced participation requirements for regular season and playoff player specials, ensuring action if the player is in at least one starting lineup; defined attacking goals and excluded own goals from player markets; added "Neither" as winner for next scorer if no further goals.
6. **Soccer:** Minor additions to statistics grading sources; clarified corner markets to grade based on when the corner is taken, not awarded; repeated handling for unlisted players in goalscorer markets and added logic for "No Goalscorer" selection if offered, otherwise graded as loss.
7. **Boxing:** Updated abandonment and postponement rules to void undetermined wagers if the event does not occur on the same local date, with carry-over provisions if a new date is announced.
8. **Golf:** Adjusted settlement clarification for hole-in-one markets if the tournament is reduced to 36 holes or fewer, unless already determined.
9. **Cricket:** Reordered and clarified moneyline grading for weather-affected matches, no-results, and super overs; added minimum 200 overs bowled for first-class draws to avoid voids.
10. **Darts:** Specified that bets stand as action if a player retires after throwing at least one dart; added voiding for Premier League daily/weekly specials if the scheduled number of matches do not occur, unless the outcome is already determined.
11. **Motorsports:** Removed reference to "The Field" including unlisted drivers in outright winners and applied general rules; required both drivers to start qualifying for matchup action; introduced new overtaking markets excluding first lap, pit entries, retirements, and lapping; specified FIA official website data for fastest pit stop awards and refined pit-stop winner as the first to enter the pit-lane.



Sports Wagering Division

CONCLUDING STATEMENT:

These updates aim to standardize grading, reduce ambiguities, and align with industry best practices, potentially minimizing disputes. The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and recommends approving these changes.

Section A: General Rules

5. Same Game Parlays

5.3

Live Same Game Parlays will be graded as follows (excluding Football, Basketball and Baseball, reference Football rule FO.8.1, Basketball rule BB.8.1 and Baseball rule BS.8.1):

- a) If all selections within a Same Game Parlay win, the wager will be graded as a win.
- b) If any selection within a Same Game Parlay loses, and there are no selections that are a push or void, the wager will be graded as a loss.
- c) If any selection(s) within a Same Game Parlay are a push or void, the wager will be graded no action and stakes refunded.

~~Live Same Game Parlay will be graded as follows:~~

- ~~a) If all the selections within a Live Same Game Parlay win, the wager will be graded as a win.~~
- ~~b) If any selection(s) within a Live Same Game Parlay are a push or void, the wager will be graded no action and stakes refunded.~~
- ~~c) If any selection within a Live Same Game Parlay loses, and there are no selections that are a push or void, the wager will be graded as a loss.~~

25. General Market Rules

25.29

Draft markets: Unless otherwise specified, all draft markets are considered action. All draft markets will be graded at the time of the draft. Any trades occurring after the draft will not be considered for grading purposes.

Draft Props: The official competition website will be used for grading purposes (e.g., a player's Nationality/Country, position, school, etc.).

Draft Position: For over/under markets, if a player is undrafted, the "over" selection will be deemed the winner.

Number X Overall Pick: Wagers will be settled according to the official draft position as the pick is made, irrespective of any trades made following the announcement of the pick.~~Draft markets:~~

~~All draft markets will be graded at the time of the draft. Any trades occurring after the draft will not be considered for grading purposes.~~

~~Draft props: the official competition website will be used for grading purposes (e.g., a player's Nationality/Country, position, school, etc.).~~

~~Draft position: for over/under markets, if a player is undrafted, the "over" selection will be deemed the winner.~~

~~Number X overall pick: wagers will be settled according to the official draft position as the pick is made, irrespective of any trades made following the announcement of the pick.~~

25.30

Player Award Markets: All bets will be considered action unless the award is not assigned to any individual. Settled on the winner announced by the League. Should the League or Governing Body announce multiple winners Dead Heat Rules Apply.

Player Awards markets (e.g., MVP): All bets will be considered action regardless of players taking part.

26. Exclusives, Boosts and Specials

26.13

Any Odds Boosts or Special Markets involving a team to win will be graded as a loss in case of a tie.

Section B: Sport-Specific Rules

Baseball

Specific market rules

BS.6.6

Player Prop wagers will be deemed to have participated in an event if: The starting pitcher must throw the first pitch for their team. If a player is a position player or designated hitter, they must be in the official starting line-up and make at least 1 plate appearance.

MLB All-Star Game Only: Player Prop wagers will be deemed to have participated in the event if: A pitcher records at least 1 pitch for their team. If a player is a position player or designated hitter, they must make at least 1 plate appearance. All bets will be graded on 9-inning play only, with the exception of moneyline bets, which will include any potential tiebreaker.

~~Player Prop wagers will be deemed to have participated in an event if: The starting pitcher must throw the first pitch for their team; If a player is a position player or designated hitter, they must be in the official starting line-up and make at least 1 plate appearance.~~

BS.6.8

Team/Player To Hit For The Cycle:

Team/Player to record a single, double, triple, and home run within the same game.

Same Game Parlays

BS.8.1

MLB Live Same Game Parlays will be graded as follows:

- a) If all selections within a Same Game Parlay win, the wager will be graded as a win.
- b) If any selection within a Same Game Parlay loses, the wager will be graded as a loss, regardless of any other selections that are a push, void, or win.
- c) If any selection(s) within a Same Game Parlay are a push or void, and all remaining selection(s) within that Same Game Parlay are a win (i.e., there are no losing selections), the wager will be graded as a win with re-calculated odds and payout reflecting the remaining legs that are not a push or void.
- d) If all selections within a Same Game Parlay are a push or void, the same game parlay selections will be graded no action and stakes refunded.

Basketball

Futures

BB.4.8

Regular Season player props markets, player to record X statistic, will be graded on the official result from the competition's governing body. The statistics from the NBA Cup Final and the WNBA Commissioner's Cup Final do not count towards grading these markets unless otherwise stated. Minimum 1 game played for bets to be action. Excluding markets listed in rule BB 4.10 player regular season average leaders.

Regular Season player props markets, player to record X statistic, will be graded on the official result from the competition's governing body. The statistics from the NBA Cup Final and the WNBA Commissioner's Cup Final do not count towards grading these markets unless otherwise stated. Minimum 1 game played for bets to be action.

General market rules

BB.5.1

Full game and second half markets include overtime for grading purposes, unless stated otherwise.

4th Quarter Markets do not include overtime, unless stated otherwise.

Full game and second half markets include overtime for grading purposes, unless stated otherwise.

BB.5.2

For all matches that are played as part of a two-legged tie, where the aggregate score is equal at the end of regulation time in the 2nd leg, overtime will be included to determine the outcome of 2nd leg match wagers.

In the event that a match finishes in a tie, but no overtime is played, all markets are settled according to the result at the end of regular time (except Moneyline, which is a push).

For all matches that are played as part of a two-legged tie, where the aggregate score is equal at the end of regulation time in the 2nd leg, overtime will be included to determine the outcome of 2nd leg match wagers.

BB.6.2

Quarter/Half Player Props:

Winning selections are determined by statistics achieved by the player in the specific listed quarter/half. All bets are action if the player is active in the game, regardless of whether the player takes part in the listed quarter/half. A player is deemed to have participated if they enter the court during the game, or specified time period, as applicable.

BB.6.3

Player First Field Goal Scorer/Basket/Rebound/Assist:

Wagers will be deemed no action and voided if the specified player does not start the specified period.

While we endeavor to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request.

As such, for First Field Goal Scorer/Basket/Rebound markets, if the points/rebounds are recorded by players not listed, all wagers will stand and be graded as if the winning selections were listed.

First Field Goal Scorer: Resulted on the first field goal of the game, free throws do not count.

First Basket: Resulted on the first score of the game, inclusive of free throws.

First Rebound: If the first rebound is a "team rebound", this market will settle as the first individual player to record a rebound after the "team rebound".

First Field Goal Scorer:

~~Wagers will be deemed no action and voided if the specified player does not start the specified period.~~

~~While we endeavor to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request. As such, for First Field Goal Scorer markets, if the points are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.~~

BB.6.6

Player To Record Double Double: An individual player must record 10 or more in at least two of the following five categories in a game: Points, Rebounds, Assists, Blocks, Steals.

Player To Record Triple Double: An individual player must record 10 or more in at least three of the following five categories in a game: Points, Rebounds, Assists, Blocks, Steals.

First Basket markets:

~~Wagers will be deemed no action and voided if the specified player does not start the specified period.~~

~~While we endeavor to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request. As such, for First Basket markets, if the points are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.~~

BB.6.10

Daily "Any 3 of 4" player markets: All players from different teams/events must play in the stated events for wagers to be considered as action. If any listed player does not play in the stated game, then all wagers will be deemed no action and refunded.

BB.6.11

Will There Be Overtime Yes/No:

Market will be settled as Yes if at the end of regular time the match finishes in a draw, regardless of whether or not overtime is played.

In-play

BB.7.1

Possession markets:

An offensive rebound during normal play continues a possession.

An offensive rebound from a free throw constitutes a new possession.

A jump ball where the defensive team gains possession will be graded as "Turnover".

Blocked shots that get rebounded by the defensive team will be graded as "Missed Field Goal".

Non-shooting fouls that lead to free throws will be graded as "Attempted Free Throw" if they occur during normal play.

Non-shooting fouls that lead to free throws during breaks in play will see possession continued.

Offensive basket interference will be graded as "Turnover".

Team to Score in their First/Next Possession Yes/No: Dead-ball technical FT(s) unrelated to the possession do not satisfy "Yes" or resolve the market; possession numbering/outcome continues afterward

Possession Outcome Markets: The outcome is graded as the final outcome before ceding possession. For example, in case of a team scoring a 2-pointer after rebounding a missed field goal, this will be graded as a made 2-pointer.

Possession markets:

~~An offensive rebound during normal play continues a possession.~~

~~An offensive rebound from a free throw constitutes a new possession.~~

~~A jump ball where the defensive team gains possession will be graded as "Turnover".~~

~~Blocked shots that get rebounded by the defensive team will be graded as "Defensive Rebound".~~

~~Non-shooting fouls that lead to free throws will be graded as "Attempted Free Throw" if they occur during normal play.~~

~~Non-shooting fouls that lead to free throws during breaks in play will see possession continued.~~

~~Offensive basket interference will be graded as "Turnover".~~

BB.7.2

Team/Player Attempt/Type/Exact Markets:

Wagers on Next Field Goal markets will be graded as void should there be no further field goals scored.

In the case of a review, for example a 2-point field goal is changed to a 3-point field goal and vice versa, the market is graded to the final ruling.

Any wagers not graded when a player fouls out, get ejected or is ruled out with injury will be graded as void.

In the case of a specific score not occurring in the game, all markets with the incorrect score listed in the market's context will be deemed as void. For example, if a 2-point field goal is changed to a 3-point field goal, the markets with the score reflective of the 2-point field goal will be void.

Player to Score Next Point: Technical/clear-path/away-from-play/dead-ball tech made free throws do not count except first point in the game.

Defensive goaltending/basket interference counts as a made field goal for the shooting team.

Team/player attempt/type/exact Markets:

~~Wagers on Next Field Goal markets will be graded as void should there be no further field goals scored.~~

~~Any wagers not graded when a player fouls out, get ejected or is ruled out with injury will be graded as void.~~

~~In the case of a specific score not occurring in the game, all markets with the incorrect score listed in the market's context will be deemed as void. For example, if a 2 point field goal is changed to a 3 point field goal, the markets with the score reflective of the 2 point field goal will be void.~~

Same Game Parlays

NBA/WNBA/NCAA Live Same Game Parlays will be graded as follows:

a) If all selections within a Same Game Parlay win, the wager will be graded as a win.

b) If any selection within a Same Game Parlay loses, the wager will be graded as a loss, regardless of any other selections that are a push, void, or win.

c) If any selection(s) within a Same Game Parlay are a push or void, and all remaining selection(s) within that Same Game Parlay are a win (i.e., there are no losing selections), the wager will be graded as a win with re-calculated odds and payout reflecting the remaining legs that are not a push or void.

d) If all selections within a Same Game Parlay are a push or void, the same game parlay selections will be graded no action and stakes refunded.

Basketball 3x3

Market grading is as per the Basketball section of these rules.

BB.9.1

Football

Specific market rules

FO.6.2

For pre-game player prop markets, if the player participated in the event and took the field for at least one play at any point of the event, all bets are action.

For live player prop markets, if the player has played one play at any stage of the event, before or after any wagers are placed, all bets are action.

If a player does not participate in the event, wagers will be deemed no action and refunded.

~~A player is considered to have participated in an event if they take to the field for at least one snap.~~

FO.6.13

Either Team To Record X Unanswered Scores:

PATs and 2-point conversions are excluded from the market.

In-play

FO.7.1

Team Drive Markets:

Team Drives are deemed to have started on the first offensive snap of the ball. Any drives which are completed due to the end of the half or game and do not explicitly result in one of the outcomes listed will be void. [Excluding Team Offensive Drive To Score Yes/No]

Team Offensive Drive To Score Yes/No: All bets stand. For all incomplete drives due to clock running out, "No" is the winning selection.

Field Goal Attempt is deemed the winning selection if the kicker kicks the ball. Blocked, scored, missed, or returned field goals will all be graded as "Field Goal Attempt". Botched/fake field goals are not considered a field goal attempt.

Punt is deemed the winner if the punter kicks the ball. All punts returned for a touchdown will be graded as "Punt".

Blocked and muffed returns will be graded as "Punt", and a new drive will begin with the next snap of the ball.

If the punt is blocked and results in a safety, the market will be graded as "Punt".

When a blocked punt or field goal results in a touchdown, the markets will result based on the conclusion of the offensive team's drive (i.e., punt or field goal, in these examples).~~Drive result markets:~~

~~Drives are deemed to have started on the first offensive snap of the ball. Any drives which are completed due to the end of the half or game and do not explicitly result in one of the outcomes listed will be void.~~

~~Field Goal Attempt is deemed the winning selection if the kicker kicks the ball. Blocked, scored, missed, or returned field goals will all be graded as "Field Goal Attempt". Botched/fake field goals are not considered a field goal attempt.~~

~~Punt is deemed the winner if the punter kicks the ball. All punts returned for a touchdown will be graded as "Punt".~~

~~Blocked and muffed returns will be graded as "Punt", and a new drive will begin with the next snap of the ball.~~

~~If the punt is blocked and results in a safety, the market will be graded as "Punt".~~

~~When a blocked punt or field goal results in a touchdown, the markets will result based on the conclusion of the offensive team's drive (i.e., punt or field goal, in these examples).~~

FO.7.3

New Set of Downs This Drive: A new first down achieved by pass, rush, or penalty will grade the market as "Yes". An offensive touchdown will grade the market as "Yes".

Next Play to Be a First Down: For pre-snap penalties where no play/down is completed, all bets are action and are graded on the next official play. For accepted post-snap penalties that result in a first down but with which no official play is recorded, all bets are action and are graded on the next official play.

The first down must be achieved by an offensive play. Additional penalty yards on the offensive play do not count toward the play resulting in a first down. For example, on 1st down and 10, a 7 yard pass completion plus additional 15 yard penalty on the defense would result in "No" being graded as a winner and "Yes" graded as a loser, as the 7 yard completion did not achieve the first down.

~~New Set of Downs This Drive: A new first down achieved by pass, rush, or penalty will grade the market as "Yes". An offensive touchdown will grade the market as "Yes".~~

FO.7.6

Player This Drive Markets:

Includes but is not limited to: Player Rushing Yards on Drive, Player Receiving Yards on Drive, Player Passing Yards on Drive. All bets are action, regardless of whether the player takes the field during the drive.

Player to Score a Touchdown This Drive: The market will grade as the player who is credited with the touchdown according to official statistics. For example, on a receiving touchdown, the winning selection will be the player who caught the pass, rather than the passing player. All bets are action regardless of if player takes the field during the drive.

Player Catch a Pass This Drive: The player must have officially recorded a reception on the drive. All bets are action regardless of if player takes the field during the drive.

~~Player to Score a Touchdown This Drive: The market will grade as the player who is credited with the touchdown according to official statistics. For example, on a receiving touchdown, the winning selection will be the player who caught the pass, rather than the passing player. All bets are action regardless of if player takes the field during the drive.~~

FO.7.7

Player To Record X Stat In Quarter/Half: Winning selections are determined by statistics acquired by the player in the specific listed quarter. All bets have action, as long as player is active in game regardless of whether the player takes part in a snap in the listed quarter or half.

~~Player Catch a Pass This Drive: The player must have officially recorded a reception on the drive. All bets are action regardless of if player takes the field during the drive.~~

FO.7.12

NCAA Football Team Next Play Type/Team Next Play Type & 1st Down Script:

For post-snap penalties where the play stands, the market will be settled according to official statistics of the play prior to the penalty being added. For accepted post-snap penalties and post-snap penalties where the play is aborted or negated with no official statistics recorded, the bets will be deemed no action and refunded. For pre-snap penalties where no play/down is completed, all bets are action.(Graded on next official play).

Bets will be deemed no action and refunded if the play does not result explicitly in a pass or run (for example, a field goal). For any play which does not occur due to the end of the half or game, the bets will be deemed no action and refunded. A sack will be graded as a rush attempt.

FO.7.13

NFL Team Next Play Type/Team Next Play Type & 1st Down Script:

Team Next Play Type: All wagers are graded regardless of an accepted post snap penalty as long as a play is completed. For pre-snap penalties where no play/down is completed, all bets are action.(Graded on next official play).

Team Next Play Type & 1st Down Script: Any 1st down achieved by penalty will be deemed no action and refunded.

Bets will be deemed no action and refunded if the play does not result explicitly in a pass or run (for example, a field goal). For any play which does not occur due to the end of the half or game, the bets will be deemed no action and refunded. A sack will be graded as a pass attempt.

Same Game Parlays

FO.8.1

NFL/NCAA Live Same Game Parlays will be graded as follows:

- a) If all selections within a Same Game Parlay win, the wager will be graded as a win.
- b) If any selection within a Same Game Parlay loses, the wager will be graded as a loss, regardless of any other selections that are a push, void, or win.
- c) If any selection(s) within a Same Game Parlay are a push or void, and all remaining selection(s) within that Same Game Parlay are a win (i.e., there are no losing selections), the wager will be graded as a win with re-calculated odds and payout reflecting the remaining legs that are not a push or void.
- d) If all selections within a Same Game Parlay are a push or void, the same game parlay selections will be graded no action and stakes refunded.

Ice Hockey

Futures

HO.4.5

All NHL Regular Season Player Specials are graded based on official results, statistics and scores recorded by the league. Unless otherwise stated, all wagers stand regardless of season length.

All NHL Playoff Team & Player Specials/Statistical Leaders (ex. Most Goals, Points, Shots On Goal, Wins, Winning Streak) are graded based on official results, statistics and scores recorded by the league. Unless otherwise stated, all wagers stand regardless of number of playoff games played by each team.

All wagers have action once the named player has participated in at least a single game after the time the wager was placed. Dead Heat Rules apply.

~~All NHL Regular Season Player Specials are graded based on official results, statistics and scores recorded by the league. Unless otherwise stated, all wagers stand regardless of season length.~~

~~All wagers have action regardless of the number of games played by the named player as long as the named player is in the official starting line up of at least a single game after the time the wager was placed.~~

HO.4.7

For Monthly Player Leader/Most markets involving players from different teams and/or events, all wagers are action regardless of individual number of games played. Markets will be graded based on all regular season games that are played within the stated calendar month. In the event of a tie, Dead Heat Rules apply. If any games within such calendar month are postponed to another calendar month, all wagers will be deemed no action and voided, unless the result of the wager has already been determined.

~~For monthly player Proposition specials involving players from different teams and/or events, all players listed in the specials market must play in the stated month for wagers to be declared action. If any listed player in the specials market does not play in the stated month, all wagers will be deemed no action and voided.~~

~~Markets will be graded based on all regular season games that are played within the stated calendar month. If any games within such calendar month are postponed to another calendar month, all wagers will be deemed no action and voided, unless the result of the wager has already been determined.~~

Specific market rules

HO.6.6

~~For the following rules related to player markets only, we define an Attacking Goal to be a goal that is not deemed to be an Own Goal, i.e., a goal scored by a player of the scoring team.~~

HO.6.7

~~Own Goals, in competitions where they are awarded, do not count towards the grading of player markets. Player markets will be graded on the next Attacking Goal player to score in the match.~~

~~For example, if the first goal of the match is an own goal, and the second goal of the match an Attacking Goal, then both the "First Goalscorer" and "Second Goalscorer" markets will be graded based on the scorer of the second goal.~~

HO.6.9

Official grading of Total Goals markets uses NHL.com's official scoring summary:

"1st Period Goal In The First Five Minutes: Total Goals - 1st Period (00:00-04:59)" markets refer to the first 5 minutes of the game starting from 0:00 and counting up until 4:59 has elapsed.

"1st Period Goal In The First Ten Minutes: Total Goals - 1st Period (00:00-09:59)" markets refer to the first 10 minutes of the game starting from 0:00 and counting up until 9:59 has elapsed.

In-play

HO.7.3

Team To Score Next Goal markets: Where no further goals are scored in a match "Neither" will be graded as a winning selection. Where no further goals are scored in a match, the "Next Scorer" market available will be graded as a winning selection for "Neither".

HO.7.4

For In-Play Interval Markets:

The first market offered in Periods 1-3 will be between 20:00 & 15:01 and the markets refer to the first 5 minutes of the period starting from 20:00 and counting down until 15:01 remains.

Subsequent markets will following the same counting down structure (e.g., 15:00-10:01, 10:00-5:01, etc.) with 5:00-0:00 referring to the last 5 minutes of the period.

All Goal Scorers and 5 minute interval winners will be graded in line with their given time intervals.

For In-Play Next Two Minute Markets:

These markets refer to 2 minute intervals of the period and count down.

For example, "Team To Record Shot On Goal In Next Two Minutes (20:00-18:01)" markets refer to the first 2 minutes of the game starting from 20:00 and counting down until 18:01 of time elapsed.

Official grading uses NHL.com's official scoring summary.

For time-based markets "Total Goals—1st Period (00:00-04:59)" and "Total Goals—1st Period (00:00-09:59)" the wagers refer to the first 5 and 10 minutes of the game. Starting from 0:00 and counting up until 9:59 has elapsed. Official grading of Total Goals markets uses NHL.com's official scoring summary.

For "Team To Record Shot On Goal In Next Two Minutes (20:00-18:01)" the wagers refer to the first 2 minutes of the period. Starting from 20:00 and counting down until 18:01 of time elapsed. For example, if Sidney Crosby scores a goal at 9:23 of period 1, the goal was scored 9:23 into the game (starting from 0:00), however the shot on goal resulting in the goal occurred at 10:37 of period 1 (starting from 20:00).

HO.7.8

For Next Faceoff Winner markets, (ex. 1st Period Next Face Off Winner after 17:27), the wagers refer to the time the last Face-off was recorded based on the game clock starting at 20:00 and counting down towards 0:00 in line with NHL.com official game log. The market will be graded based on the winner of the following Faceoff from the time posted, counting down towards 0:00 as the period ends.

HO.7.9

For "Next" (Xth) Goalscorer markets, if the quoted goal is not scored in regulation and overtime then bets will be refunded.

Soccer

General market rules

SO.5.3

For team and player statistics markets, grading will be based on statistics published by Opta or WhoScored. For team and player statistics markets such as "shots" or "shots on goal", grading will be based on statistics published by Opta or WhoScored.

SO.5.4

Corner markets are graded based on the number of corners taken in the match or period, not the number that are awarded. For example, if a corner is awarded, but the match moves to full time or beyond the specified match period before the corner is taken, this corner will not count for grading purposes. All corner markets offered in a specified interval will be graded on the time when the actual corner is taken(not the time it is awarded).

Corner markets are graded based on the number of corners taken in the match, not the number that are awarded. For example, if a corner is awarded, but the match moves to full time before the corner is taken, this corner will not count for grading purposes.

SO.5.5

Unless otherwise stated, all Shots markets (Total Team/Player Shots, Next Team/Player Shot) will include blocked shots.

SO.5.6

Specific to 'Shots on Target' markets only, these will be graded according to the following definition of a Shot On Target: Any attempt on goal that a) goes into the net (regardless of intent), or b) is a clear attempt to score a goal that would have gone into the net but for a goalkeeper save, or being stopped by the last line defender (with the goalkeeper having no chance of saving). Shots blocked by another player, who is not the last line defender, are not counted as shots on target

Specific market rules

SO.6.1

While we endeavor to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request.

As such, for player markets ("First Goalscorer", "Last Goalscorer", "Anytime Goalscorer" and similar), if goals are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.

In the case of No "First", "Next", "Anytime Goalscorer" in a match, where a "No Goalscorer" selection is offered, this will be graded as the winning selection. If a "No Goalscorer" selection is not offered, all wagers will be considered action and graded as a loss.

While we endeavor to quote all eligible players in player markets, we may on occasion not list a player, or to add a player to markets after the markets are first published. Patrons may request players to be added to markets on request.

As such, for player markets ("First Goalscorer", "Last Goalscorer", "Anytime Goalscorer" and similar), if goals are scored by players not listed, all wagers will stand and be graded as if the winning selections were listed.

SO.6.17

"First 10 minutes" markets refer to the first 10 minutes of the match (00:00 to 09:59). Corners, penalties or free kicks awarded in this period but not taken until after 10:00 will not count. Any event that occurs after 10:00 or later within the match will not count.

In-play

SO.7.1

For markets which feature an incident to occur in an upcoming time interval (e.g. Team To Record The Next Save After XX:XX), and there are only two selections (Home Team vs. Away Team), if the incident does not occur within the specified period all wagers will be voided and refunded.

Boxing

Abandonment or postponement

BX.2.1

~~If an event is abandoned, cancelled, or postponed, then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action and refunded if the event does not take place within 48 hours. If an event is abandoned, cancelled, or postponed without a new date for the fight, then wagers that have already been determined will be graded as such, while those that are yet to be determined will be deemed no action if the event does not take place on the same date (local time).~~

~~Where a fight is rescheduled with a new date announced, wagers will carry over the amended date.~~

Golf

Incomplete events

~~GF.2.2~~

~~Where an event is scheduled to play across multiple venues, for example the Alfred Dunhill Links Championship, all venues must have play according to the scheduled format for wagers to be considered as action.~~

Specific market rules

GF.5.6

Hole-in-one markets:

Should the tournament be reduced from the scheduled number of holes, then all wagers on this market will be deemed as no action and voided, unless already determined. In a specified player to make a hole-in-one market, that player must tee off for wagers to stand

~~Hole in one markets:~~

~~Should the tournament be reduced to 36 holes or fewer, then all wagers on this market will be deemed as no action and voided, unless already determined.~~

~~In a specified player to make a hole in one market, that player must tee off for wagers to stand.~~

Cricket

General market rules

CR.3.1

Money line wagers will be graded on the official result of the match. If the match is affected by external factors (such as weather), wagers will be graded based on the official competition rule that is relevant (this includes matches where the Duckworth Lewis Method is used, or where the scheduled number of innings is officially reduced). If a match is decided by a super over, then the result of the super over will determine the winner for betting purposes.

The exception to this is on any occasion where a "bowl-out" or coin toss is used to determine the official winner of an event, in which case any undetermined wagers at this point will be considered no action and refunded.

If a match is officially declared as a "no result", all wagers will be deemed as no action and refunded.

~~Money line wagers will be graded on the official result of the match.~~

~~If a match is officially declared as a "no result", all wagers will be deemed as no action and voided.~~

~~If the match is affected by external factors (such as weather) wagers will be graded based on the official competition rule that is relevant (this includes matches where the Duckworth Lewis Method is used, or where the scheduled number of innings is officially reduced).~~

CR.3.2

If the result of a Test Match, First Class Match, or any other 3-, 4- or 5-day match is a tie (all innings are complete and scores are equal), 3-Way Moneyline market will be settled as a Dead Heat between the two named sides and NOT as a Draw. In matches abandoned, decided by a coin toss or a bowl out, where there have been no balls bowled, all bets will be deemed no action and refunded. In matches abandoned due to outside interference (not including inclement weather), all bets will be deemed no action and refunded unless the official competition rules determine a winner.

If the result of a Limited Overs match (e.g., T20 or ODI) is a tie, and official competition rules do not determine a winner, then Dead Heat rules are applied to wagers. Where there is a tie (as determined by the official governing body) bets will be settled according to the official match result determining the winning side/side to progress. If a winner is determined by official competition rules, such as a Super Over or Eliminator Over, then this will be considered for grading purposes.

~~If the result of a Test Match, First Class Match, or any other 3,4 or 5 day match is a tie (all innings are complete and scores are equal), the Money Line or Match Winner market will be declared no action and wagers voided.~~

~~If the result of a Limited Overs match (e.g., T20 or ODI) match is a tie, and official competition rules do not determine a winner, then Dead Heat rules are applied to wagers.~~

~~If a winner is determined by official competition rules, such as a Super Over or Eliminator Over, then this will be considered for grading purposes.~~

CR.3.3

Unless otherwise stated in Specific market rules, Game Props and Player Props in Limited Overs matches (e.g., T20 or ODI) will be no action and void if it has not been possible to complete at least 80% of the overs scheduled to be bowled in either innings due to external factors, including bad weather, unless settlement of the bet has already been determined. In First Class matches that result in a draw, bets will be void if fewer than 200 overs have been bowled, unless settlement of the bet has already been determined.

Specific market rules

CR.4.2

Fall of Next Wicket and Highest Opening Partnership:

The Team score at the fall of the named wicket will be taken for settlement purposes. If a batsman retires hurt, and is replaced by a different player, this will not count as a wicket and the market will not be settled until a wicket has fallen. If the Innings reaches a natural conclusion (Declaration or reaches target) then the final Innings score will be deemed the result for settlement purposes, but it must be possible for the team to have surpassed quotes traded on or these bets will be void. If an Innings is curtailed due to the intervention of rain, then bets shall be settled if already determined (the total has been passed already) or voided if not already determined, should there be no further play. Extras and Penalty Runs will be included. In the event of an abandoned match, bets will be void unless settlement has already been determined.

Fall of Next Wicket:

~~Grading is based on the total innings runs a team has scored at the fall of the specified wicket.~~

~~If either batsman retires after the wager is placed, the wager continues to the next fall of wicket.~~

If there is no further dismissal before the innings close, then wagers will be graded based on the total number of innings runs at the close of innings.

All open wagers will be voided if 50 full overs are not bowled, unless one team has won, is dismissed, or declares prior to that point.

CR.4.7

Highest Score in First Over:

Both sides must bowl their first over in its entirety unless settlement has already been determined. For limited overs matches, if the second innings is shortened by more than 20% of the scheduled overs for any reason after the first over of the first innings has been bowled, then bets will be void. In first class or Test matches, the first over of the first innings only counts for settlement purposes. The score at the end of the over will be taken including extras and penalty runs. In the event of a tie, where the market is offered as a two-way option only, bets will be void.

CR.4.8

Match Extras:

Wides, No balls, Byes, and Leg Byes all count. Penalty Runs do not count as Extras for the purposes of this market. Where there are runs off the bat and an extra is bowled in the same delivery, the runs off the bat do not count towards the extras tally.

CR.4.9

Innings Markets:

For limited overs matches, the team must have the opportunity to face at least 80% of the originally scheduled overs, unless settlement is already determined, or bets will be void. For First Class or Test Matches, the Team's first innings only counts, unless specified, and at least 60 overs must be bowled in the innings unless the named team is all out or declares. Extras and Penalty runs will be included in the final total for settlement purposes if attributed at the time before the end of the innings, but not if added retrospectively. In the case of curtailed innings, any bets placed after the final delivery of the curtailed innings has been bowled will be no action and voided.

Darts

DA.1.6

If a player retires during a match, any bets on that player will be deemed action after one dart is thrown and markets settled accordingly.

DA.1.7

For markets such as "Most 180s & Win Match", "Most 180s, Highest Checkout & Win Match" and "Highest Checkout & Win Match", each of the aspects of the parlay must have been won for the bet to be deemed a winner. For example, if you wager on Luke Littler to have Most 180s & Win Match and he wins the game, but he and his opponent both throw 4 180s, the bet is a loser. Same would apply if there is a tie on highest checkout in any of the above related markets.

DA.1.8

Premier League: For All Premier League related futures, the player must take part in at least one league match for bets to stand.

To Finish Top Of The League: This refers to the player who tops the Premier league table following Night 16 fixtures.

To Win The Tournament: This refers to the player who wins the Premier League playoffs between the top 4 finishers in the league table on Night 17.

Premier League daily/weekly specials: Bets will be deemed no action and refunded if the scheduled number of matches do not take place in the specified Premier League day/week, unless the outcome has already been determined.

DA.1.9

Futures: Any bets on a player who does not take part are deemed no action and refunded. Any bets on a player to win a tournament is deemed action as soon as they throw a dart. For example, if a player were to withdraw during the tournament after they have already thrown a dart, it would be deemed a losing bet.

Motorsports

General market rules

MS.4.2

Outright Winner Markets:

Grading will be based on official competition results as determined at the end of the race, with dead heat rules applying where necessary. The Field includes any driver who is not listed.

Any post-race penalties or disqualifications will not be considered for grading purposes.

MS.3.1 rules apply to outright winner.

~~Grading will be based on official competition results as determined at the end of the race, with dead heat rules applying where necessary.~~

~~Any post race penalties or disqualifications will not be considered for grading purposes.~~

MS.4.7

If a driver is replaced during the race then bets will stand on his replacement.

MS.4.8

Fastest Qualifier is based on qualifying times (fastest times) and not the starting line up. Grid/starting position penalties and subsequent disqualifications do not apply for settlement purposes. If any driver fails to start Qualifying, wagers placed on that specific driver will be refunded.

Applies to qualifying matchups. Both drivers must start qualifying for wagers to be action.

Specific market rules

MS.5.1

Matchups:

Both drivers must start the race (e.g. cross the start line) for bets to be action. All match-ups will be settled as per the official governing body result at the end of the race. Any post-race penalties or disqualifications will not be considered for grading purposes.

If one driver fails to complete the race then the other driver will be declared the winner. Where both drivers fail to complete the race then the official placing as assigned by the controlling authority at the end of the race will determine the result. If both drivers fail to complete on the same lap, then the official placing as assigned by the controlling authority at the end of the race will determine the result.

Rule MS.2.1 applies.

~~Wagers on head-to-heads will be based on the order of finish at the completion of the specified stage.~~

MS.5.2

Group Betting:

All drivers must start the race (e.g. cross the start line) for bets to be action. All Group Betting will be settled as per the official governing body result at the end of the race.

If any driver fails to complete the race, then the official placing as assigned by the controlling authority will be used towards determining the result. If all drivers fail to complete on the same lap, then the official placing as assigned by the controlling authority at the end of the race will determine the result.

Rule MS.2.1 applies.

Overtaking Markets:

~~An overtaking must last until the end of a lap for grading.~~

~~Overtakings during the first lap are not considered for grading.~~

~~Overtakings of a driver in the same lap when they enter the pit lane are not considered for grading.~~

~~Overtakings of a driver during the lap of retirement are not considered for grading.~~

~~Lapping and unlapping is not considered as overtaking for grading.~~

MS.5.4

Pit-stops Markets:

The driver who enters the pit-lane first is considered as the winner for grading.

If a driver retires after entering the pit-lane they are still considered for grading.

FIA Fastest Pit Stop Award is settled based on the data recorded by the FIA official website.

Pit-stops Markets:

~~The driver who enters the pit-lane first is considered as the winner for grading.~~

~~If a driver retires after entering the pit-lane they are still considered for grading.~~

MS.5.5

Winning Manufacturer/Team:

All bets are action regardless of certain drivers not starting the race.

MS.5.6

Top Finishes/Top Manufacturer Driver:

All bets are action where the named driver participates in any part of the race (qualification, main race).

MS.5.7

Lap Markets:

Lap markets will be graded based on the results from the official governing body website.

MS.5.8

Driver To Be Classified:

All drivers will be considered classified finishers once they have completed 90% of the race laps. For the purpose of match and positional betting, the ranking given to the driver at the end of the race will apply.

MS.5.9

Fastest Lap:

Market will be graded based on the result from the official governing body website.

MS.5.10

Sprint Race Weekend (F1):

Unless otherwise stated, all markets will be graded based on the result of the main weekend race. All Sprint Race specific markets will be explicitly designated. Sprint Race wins will not count towards overall season race wins markets unless stated otherwise in market description.



TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Andrew Steffen – Compliance Operations Manager, Sports Wagering

MEMO: 1/30/2026
MEETING: 2/26/2026

RE: MGM Springfield Request to Payout Lost Wagers

EXECUTIVE SUMMARY:

MGM Springfield, a Category 1 Sports Wagering Operator, has submitted two requests seeking Commission approval to satisfy claims for lost sports wagering tickets pursuant to 205 CMR 238.47(1)(b). Each request pertains to a patron who alleges the loss of a valid wagering ticket prior to redemption. MGM Springfield has conducted internal reviews for both claims and has provided supporting documentation indicating that the tickets were valid, unpaid, and otherwise eligible for redemption.

REGULATION BACKGROUND:

Pursuant to 205 CMR 238.47, Sports Wagering Operators are prohibited from paying a sports wagering ticket unless the ticket is physically presented for redemption. However, 205 CMR 238.47(1)(b) provides a limited exception, allowing payment of a lost, stolen, or destroyed ticket when the Commission determines that payment is appropriate based on documentation and information submitted by the Operator.

Specifically, 205 CMR 238.47(1)(b) permits payment where the Operator demonstrates, to the Commission's satisfaction, that the claim is valid and that payment would not result in fraud, duplication, or other integrity concerns.

“(1) Validation Process. The Sports Wagering Operator shall define and implement procedures to ensure the validity of winning Sports Wagering tickets and vouchers, and process payouts thereof.”



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(b) The Sports Wagering Operator shall not satisfy claims on lost, mutilated, or altered Sports Wagering tickets without authorization of the Commission.”

DISCUSSION:

MGM Springfield has submitted two separate requests via email seeking Commission authorization to pay patrons who reported lost sports wagering tickets. In both instances, MGM Springfield represented that the patrons reported the lost ticket and provided sufficient information to allow the MGM to identify the wagers through its surveillance and other internal systems.

Request #1

- From MGM Springfield via email on 12/19/25
- Wager amount: \$600.00
- Pending Payout: \$1,080.00

Request #2

- From MGM Springfield via email on 1/21/26.
- Wager amount: \$220.00
- Pending Payout: \$420.00

For each request, MGM Springfield conducted an internal investigation, which included verification that:

- The ticket was validly issued by MGM Springfield;
- The wager resulted in a winning outcome;
- The ticket had not been previously redeemed;
- No conflicting claims or indicators of fraud were identified; and
- The requested payment amount aligns with the recorded wagering data.

MGM Springfield supplied documentation supporting each claim, including wager details, ticket identifiers, timestamps, and internal system records. SWD reviewed the materials submitted and found them to be consistent with the requirements of 205 CMR 238.47(1)(b).

Based on SWD review, there are no indications that approval of these requests would compromise wagering integrity or result in duplicate payment. Both claims appear to meet the regulatory standard for lost ticket payment under the applicable regulation.

ADDITIONAL QUESTION OF DELEGATION:

Should the Commission be so inclined, the authorization required by 205 CMR 238.47(1)(b) could be delegated to the SWD in the future. Such authorization could be delegated in all



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circumstances or in circumstances where the payout is below a particular dollar threshold. For example, the Commission could delegate to the SWD the authority to provide such authorization under 205 CMR 238.47(1)(b) where the claim on a lost, mutilated, or altered sports wagering ticket is for a payout of \$5,000 or less.

CONCLUDING STATEMENT:

The SWD recommends the Commission approve MGM Springfield's request to pay the two patrons for their lost sports wagering tickets pursuant to 205 CMR 238.47(1)(b). Approval of these requests reflects the Commission's application of 205 CMR 238.47(1)(b) to fact-specific lost ticket claims supported by sufficient documentation and staff review, where no indicators of fraud, duplication, or wagering integrity concerns have been identified.

Additionally, the SWD seeks guidance from the Commission on whether you would like to delegate in any capacity the authorization required by 205 CMR 238.47(1)(b).



TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Brad Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Andrew Steffen – Compliance Operations Manager, Sports Wagering

MEMO: 12/29/2025
MEETING: 2/12/2026

RE: FanDuel Request to add SIS eSports to the MGC Event Catalog

EXECUTIVE SUMMARY:

FanDuel Sportsbook has submitted a petition requesting that SIS eBasketball, eFootball, and eSoccer be added to the Massachusetts Gaming Commission's (MGC) Event Catalog for approved wagering. This memo provides background on the request, relevant regulatory considerations, and an overview of SIS's eSports product, including governance and integrity controls.

REGULATION BACKGROUND¹:

Pursuant to 205 CMR 247.03(1), a sports wagering operator must petition the Commission for approval of a new sporting event or wager category.

Additionally, under 247.03(3)(e), if the proposed event is based on eSports activities, an operator must meet several additional criteria such as the proposed location, the video game and publisher used, and information on the event operator.

SUPPORTING DOCUMENTATION:

- FanDuel Event Petition Form
- FanDuel House Rules (excerpt to be added to full house rules document)
- SIS eSports Product Manual

¹ [205 CMR 247.00](#)



- Regulator Overview
- eSports FAQ

DISCUSSION:

Timeline

During the January 24, 2023, public meeting where the initial event catalog was discussed and ultimately approved, the Sports Wagering Division (“SWD”) asked the Commission to exclude eSports at that time as the division considered the information provided by the licensees was insufficient for its governing bodies and oversight. During that meeting, it was stated the SWD requested further information from the operators, however, no additional information was gathered and eSports was not included in the initial publication of the event catalog.

On July 7, 2025, the SWD met with Sports Information Services (SIS) to discuss the potential of eSports in the Commonwealth. During the meeting, it was stated that an operator with whom SIS is partnered would submit an official event petition form to begin the process with the MGC.

On July 21, in anticipation of the event petition, the SWD met with eSports Integrity Commission (ESIC)² to discuss their oversight role and integrity monitoring framework for competitive gaming.

On July 31, FanDuel Sportsbook submitted the official Event Petition Form, the additional House Rules to cover eSports, the SIS eSports Product Manual, and a Regulator Overview. The notification also provided additional information such as the official league, prize money, integrity policy, and approved jurisdictions. On December 3, FanDuel resubmitted the official Event Petition Form to include SIS eFootball, which SIS launched in December 2025.

What is eSports?

For the purposes of this petition, eSports, short for “electronic sports,” refers to organized, competitive video gaming where individuals compete against one another in structured sports simulation matches.

The eSports industry has evolved into a multi-billion-dollar global market³, with professional players, teams, sponsors, and media rights deals similar to traditional sports. Matches are typically streamed on platforms like Twitch and YouTube, and major publishers often oversee their own competitive circuits.

Petition Overview

² [ESIC official website](#)

³ [Per iGaming Business article dated 2/10/25](#)



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SIS, founded in 2018, is a U.K.-based company that produces competitive gaming content for wagering purposes. The company operates in-house studios where gamers, broadcasters, and referees (all SIS employees) compete in short, head-to-head matches using standardized rules and settings. Player matchups are determined using performance-based algorithms designed to ensure balanced competition. Each event is streamed live, with real-time odds available to sportsbook operators. SIS maintains a detailed integrity policy, employs referees to oversee gameplay, and utilizes shift managers who conduct continuous monitoring and spot checks to ensure adherence to all integrity protocols.

League Governance and Integrity Controls

The governing body for the eSports competitions offered through SIS is 49's (Competitive Gaming) Limited, an entity within SIS's corporate group, which owns and operates the H2H Global Gaming League (H2HGGL). SIS exercises direct oversight of all aspects of competition, including game settings, gameplay rules, operational procedures, and integrity standards. These requirements are documented in the H2HGGL manual and are designed to align with standards established by ESIC.

While ESIC is not the governing body of the league, referees are trained under ESIC guidelines, and H2HGGL has been awarded ESIC's Gold Standard accreditation for eSports betting products, which is subject to an annual audit. In addition to referees, league managers oversee gameplay in real time and maintain direct communication with referees and sportsbook operators. If suspicious activity is observed or reported, gameplay is immediately halted and an investigation is initiated.

Player performance within the league is continuously monitored using specialized algorithms, including an ELO-based ranking system⁴, which ranks participants and determines competitive matchups. Game schedules, matchups, statistics, and results are made publicly available through a dedicated League website.

SIS and the H2H Global Gaming League do not accept wagers or monitor betting activity directly. Wager monitoring and risk management are conducted by licensed sportsbook operators. SIS and the league support integrity efforts consistent with IBIA principles, including accountability, compliance, stakeholder cooperation, and market oversight.

Regulation Criteria

Pursuant to 205 CMR 247.03(3)(e), additional criteria must be met regarding an eSports event petition. These criteria are designed to ensure that all eSports-based events offered for wagering meet appropriate standards for integrity, transparency, and consumer protection. If the proposed

⁴ The ELO system is a method to calculate players' relative skill, assigning a numerical score that predicts match outcomes and adjusts after games based on expectation versus actual performance.



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sporting event is based on eSports activities, an operator must provide complete information about:

- 1) The proposed location of the eSport event: **FanDuel confirmed the location of the eSport event will take place in Milton Keynes, England.**
- 2) The video game used for the eSport event, including the publisher of the game: **As FanDuel is requesting eBasketball, eFootball, and eSoccer, the video games currently in use are NBA 2K26 (published by 2K Sports) as well as Madden 26 and EA FC 26 (both published by EA Sports).**
- 3) The eSports event operator, whether the eSports event operator is approved to host events by the video game publisher, and whether the eSports event operator has any affiliation with the video game publisher: **Per FanDuel, SIS is approved to host events by the video game publisher but does not have affiliations with the publisher.**
- 4) The manner in which the eSports event is conducted by the eSports event operator, including, without limitation, eSports event rules and certification from a third party, such as an eSports event operator or the game publisher, that the eSports event meets the Commission's event integrity requirements: **Only those participating in the current scheduled game are to be allowed within each studio. This includes: Two Gamers for eBasketball, eFootball, and eSoccer, a Caster (commentator) and a Referee.**

SIS has further indicated that any changes to official game versions, patches, or gameplay settings are subject to internal review and testing prior to adoption. Gamers participate in testing and data collection, and sportsbook operators are notified in advance of any approved changes before they are introduced into the live production environment.

FanDuel has indicated that SIS eSports is currently approved in 16 jurisdictions, including Arizona, Colorado, Connecticut, Kansas, Kentucky, Maryland, Missouri, New Jersey, North Carolina, Ohio, Tennessee, Vermont, Virginia, Washington D.C., West Virginia, Wyoming, and Ontario. FanDuel also confirmed that as of December 30, 2025, the event petition is pending in Puerto Rico (as well as Massachusetts). Michigan is the only jurisdiction which has not approved the event, however FanDuel stated that no reason was provided.

Event Catalog



Sports Wagering Division

Below is a proposed event catalog listing the publisher, tournament organizer, and the specific video games used for approved wagering.

Sport	Publisher	Tournament Organizer	Games
eSports	2K	SIS H2H Global Gaming League - eBasketball	NBA 2K26
	EA Sports	SIS H2H Global Gaming League - eFootball	Madden 26
Return to Index		SIS H2H Global Gaming League - eSoccer	EA FC 26

CONCLUDING STATEMENT:

The Sports Wagering Division has reviewed all submitted materials, met with relevant stakeholders and other state regulators, and finds no identified integrity, operational, or regulatory concerns with the proposed addition of SIS eBasketball, SIS eFootball, and SIS eSoccer to the MGC Event Catalog. The Division submits this matter to the Commission for consideration and guidance as to whether it wishes to expand the Event Catalog to include these eSports offerings.



MASSACHUSETTS GAMING COMMISSION

PETITION FOR A SPORTING EVENT OR WAGER CATEGORY

In accordance with 205 CMR 247.03

Directions:

Please fill out and address all areas of the form. If an area does not apply to the request, please place 'NA' in the section. Each section will extend to accommodate large answers. If needed, one may attach additional documents. Please make sure any attachments reference the relevant section and number in their title.

SECTION A **BACKGROUND**

1. NAME OF OPERATOR(S) PETITIONING:
2. REQUESTING A SPORTS WAGERING EVENT OR WAGERING CATEGORY:
3. NAME OF EVENT OR WAGERING CATEGORY:
4. IS THIS A VARIATION OF AN AUTHORIZED SPORTING EVENT OR WAGER CATEGORY?
5. IS THIS A COMPOSITE OF AUTHORIZED SPORTING EVENTS OR WAGER CATEGORIES?
6. IS THIS A NEW SPORTING EVENT OR WAGER CATEGORY?
7. PLEASE INDICATE THE JURISDICTION(S) IN WHICH YOU OPERATE WHERE THIS EVENT/ WAGER CATEGORY HAS BEEN APPROVED OR HAS BEEN SUBMITTED FOR APPROVAL:

WEBSITE LINK FOR THE EVENT AND/OR GOVERNING BODY:

SECTION B **A COMPLETE AND DETAILED DESCRIPTION OF THE SPORTING EVENT OR WAGER CATEGORY FOR WHICH APPROVAL IS SOUGHT**

1. A summary of the Sporting Event or Wager Category and the manner in which Sports Wagers would be placed and winning Sports Wagers would be determined.
2. A draft of the proposed House Rules, including a description of any technology that would be utilized to offer Sports Wagering on the Sporting Event or Wager Category.
3. Any rules or voting procedures related to the Sporting Event or Wager Category.
4. Assurance that the Sporting Event or Wager Category meets the requirements of 205 CMR 247.03(4) (*details are required in the minimum criteria section below*).
5. Whether and to what extent the outcome of the Sporting Event or Wager Category is determined solely by chance.



SECTION C
IF THE PROPOSED SPORTING EVENT OR WAGER CATEGORY IS BASED ON ESPORTS
ACTIVITIES, PLEASE ANSWER THE FOLLOWING QUESTIONS

1. The proposed location(s) of the eSports event(s).
2. The video game used for the eSports event, including, without limitation, the publisher of the video game.
3. The eSports event operator, whether the eSports event operator is approved to host events by the video game publisher, and whether the eSports event operator has any affiliation with the video game publisher.
4. The manner in which the eSports event is conducted by the eSports event operator, including, without limitation, eSports event rules and certification from a third party, such as an eSports event operator or the game publisher, that the eSports event meets the Commission's event integrity requirements.

SECTION D
POLICIES AND PROCEDURES REGARDING EVENT INTEGRITY

To the extent known by the operator(s), please provide a description of policies and procedures regarding event integrity. What integrity monitoring system is in place for the event? Has the Operator contacted them?



SECTION E
MINIMUM CRITERIA

1. Can the outcome of the Sporting Event or Wager Category be verified? If yes, explain the verification process.
2. Is the Sporting Event generating the outcome conducted in a manner that ensures sufficient integrity controls exist so the outcome can be trusted? Please explain.
3. Is the outcome likely to be affected by any Sports Wager placed? Please explain.
4. Is the Sporting Event conducted in conformity with all applicable laws? Please explain.

SECTION F

THE COMMISSION WILL CONSIDER THE REQUEST, ALL PROVIDED MATERIALS, AND ANY RELEVANT INPUT FROM THE SPORTS GOVERNING BODY OR THE CONDUCTOR OF THE SPORTING EVENT PRIOR TO AUTHORIZING A SPORTING EVENT OR WAGER CATEGORY.

1. NAME OF SPORTS GOVERNING BODY:
2. HAS THE SPORTS GOVERNING BODY BEEN INFORMED OF THIS REQUEST?
IF 'NO' PLEASE EXPLAIN THE REASON BEHIND IT:
3. IF THERE IS NO SPORTS GOVERNING BODY, NAME THE ENTITY THAT CONDUCTS THE SPORTING EVENT:
4. HAS THE ENTITY THAT CONDUCTS THE SPORTING EVENT BEEN CONTACTED REGARDING THIS REQUEST?
IF 'NO' PLEASE EXPLAIN THE REASON BEHIND IT:
5. ON BEHALF OF THE OPERATOR I HEREBY CERTIFY THAT THE RELEVANT PLAYER'S ASSOCIATION HAS BEEN CONTACTED REGARDING THIS PETITION: **YES**



IF ANY OF THE ABOVE ENTITIES HAVE BEEN CONTACTED, PLEASE PROVIDE ADDITIONAL
DETAIL BELOW, INCLUDING BUT NOT LIMITED TO WHEN THE ENTITIES WERE INITIALLY
CONTACTED ABOUT THE REQUEST ANY COMMENTS OR INPUT PROVIDED BY THE ENTITIES:

*NOTE: CONTACT WITH THE RELEVANT PLAYER'S ASSOCIATION IS A MINIMUM EXPECTATION OF THE
COMMISSION FOR SECTION F.*

SIGNATURE AND INFORMATION

*I swear or attest under the pains and penalties of perjury that the information provided as part of this request
for a hearing is true and accurate to the best of my knowledge and understanding.*



Signature of individual requesting new event/wager

Date

[If this request is submitted via email, it may be signed electronically by typing the petitioner's name on the
signature line above. In that case, the 'signature' must be preceded by /s/ (e.g.- /s/ John S. Doe). Use of an
electronic signature permits the Commission to rely upon the signature as if it were handwritten.]

Please submit this request and any attachments to the Massachusetts Gaming Commission via email at:
mgcsportswagering@massgaming.gov



1. E-Sports

1. General E-Sports

- Where the e-sports match involves Maps, e-Sports matches can be played best of 1,2,3 or 5 Maps depending on the e-Sport and tournament with the winner of the match (Moneyline) winning more Maps. A Draw will occur if each team win an equal number of Maps.
- Official Results: all e-Sports bets will be settled in accordance with the official results of the match/tournament/race (as applicable) (following any extension of normal time where required unless otherwise specified) as declared by the official organizer, administrator or governing body as officially published on the website for the applicable organizer, administrator or governing body. All decisions of relevant e-Sports officials stand.
- Errors: FanDuel makes every effort to ensure that no errors are made in listing e-Sports player and team names. All bets will stand where it is reasonably practicable that the misspelled player/team name refers to the correct player/team. If there is an obvious error, FanDuel reserves the right to void wagers.
- Map Changes: In the event of a change in the number of Maps (for those e-Sports involving Maps) to be played, all bets will be void except for match bets (provided that an official result is declared) and first Map bets. Please note that e-sports events will have differing match formats. It is solely the customer's responsibility to understand the formatting of a match before placing a bet. FanDuel Sportsbook will not be liable for any erroneous bets made under the assumption that a match would use a certain format.
- Retirements & Disqualifications: If an e-Sports race, tournament, match or Map is not completed due to retirements or disqualifications, all bets will be void except those bets on completed e-Sports matches (as applicable) or Maps which will stand. All bets will stand on a completed e-Sports race, tournament or match where there has been any retirements or disqualifications.
- All bets will stand on a retired or disqualified player except where the e-Sports race, tournament, match or Map is not completed.

- Abandonment, Postponement & Cancellation:
- If an e-Sports race, tournament or match is postponed, all bets will stand as long as the e-Sports race, tournament or match commences within:
 - a) 24 hours of the initial scheduled time for traditional e-sports (such as games involving Maps, real-time strategy (RTS), first-person shooter (FPS), multiplayer online battle arena (MOBA), and battle royale games;
 - b) 48 hours of the initial scheduled time, for sports-based e-sports (such as e-soccer).
 - c) If the e-Sports race, tournament, or match is cancelled or commences after this the periods set out above, all bets will be void.
- In the event that an e-Sports race, tournament or match is abandoned or not completed, all bets will be voided unless the outcome has been unequivocally decided.
- FanDuel Sportsbook may, in its absolute discretion, void any bets placed after the earlier of the official start time of the e-Sports race, tournament or (as published on the relevant official website) or the actual start time if started early. This Rule does not apply to live betting.
- Player & Team Changes: If an e-Sport team name changes (usually, but not limited to, sponsorship changes) but the roster or team members remain the same, all bets will stand. If a player (i.e. not a team event) withdraws prior to the start of their first race or match, all bets on that player will be void. If there is a replacement player or 'stand in' for any team in an e-Sport race, tournament or match, all bets will stand.
- Connectivity: if a race, match or Map is officially determined to be a draw due to a connectivity or technical issue (or similar reason), all live bets on the respective race, match or map will be void.
- If a race, match or Map is stopped and restarted from the beginning with the approval of the relevant administrator or official due to

connectivity or technical issues which are not player related, then all undecided markets will be void.

- If a race, match or Map is replayed, all live betting on the original race, match or Map will be voided

2. Market Specific E-sport Rules

- Match Betting: If a draw occurs, bets are void. Dead Heat Rules Do Not Apply.
- Handicap Betting: A Handicap in e-Sports can be Maps or other counting measures related to the match.
- Tournament Match Betting: in a match involving only two teams/players, both teams/players must start the match in the tournament for bets to stand. If both players progress to the same round of tournament, all bets will be void.
- First Kill/Blood Markets: Bets will be settled based on the Team that is able to achieve the first kill in the respective Map.
- First Inhibitor: Bets will be settled based on which team destroys the first inhibitor in the relevant map.
- First Dragon: Bets will be settled based on which team kills the first dragon in the relevant Map. If no Dragon is killed in the relevant map, this market will be voided.
- First Baron: Bets will be settled based on which team kills the first baron in the relevant Map. If no Baron is killed in the relevant Map, this market will be voided and all bets cancelled.
- Total Inhibitors Destroyed: Bets will be settled based on the total number of separate inhibitors destroyed. Where the same inhibitor is destroyed more than once, it will only be counted once toward the total number of inhibitors destroyed.
- 2-Way Most Kills: Bets will be settled based on which team records the most kills in the relevant Map. If teams are tied on the same number of kills then this market will be voided.
- League of Legends:

- Bets involving towers are settled based only on the towers actually destroyed during the course of the map before surrender. Towers that would have needed to be destroyed to win the game normally, but were not destroyed, will not be counted in the total. For example, if the winning team has destroyed all tier 1 towers and one tier 2 tower before the surrender, only those towers (four in total) will be counted, and no additional towers will be deemed destroyed.
- Bets involving towers and inhibitors are settled based solely on the number of towers and inhibitors actually destroyed by the winning team during the course of the map before surrender, with all destroyed inhibitors credited to the opposing team even if the last hit was from a minion. For bets involving the total number of inhibitors destroyed, each of the three inhibitors counts only once, based on whether it is down at the time of surrender, even if it was destroyed, respawned, and destroyed again. No additional towers or inhibitors are deemed to have been destroyed, regardless of what would have been theoretically required to win the game normally from that position. For example, if the winning team has destroyed all tier 1 towers and one tier 2 tower (four in total), only those four towers are counted. Similarly, if one inhibitor is down at the time of surrender, only that one inhibitor is counted, and no additional inhibitors are included, even if none are down or if an inhibitor has respawned
- Dota 2:
 - First Aegis Market – Bets will be settled based on which team picks up the 1st Aegis of the respective Map. If the Aegis is not picked up at all in a Map, this market will be voided and all bets cancelled.
 - Bets involving towers are settled based only on the towers actually destroyed during the course of the map before surrender. Towers that would have needed to be destroyed to win the game normally, but were not destroyed, will not be counted in the total. For example, if the winning team has destroyed all tier 1 towers and one tier 2 tower before the surrender, only those towers (four in total) will be counted, and no additional towers will be deemed destroyed.
- E-Basketball:
 - Unless specified below, all settlement includes overtime, if played:

- Quarter Markets: Resulted on score for relevant quarter - overtime does not count.
- Second Half Markets: Resulted on score for second half, inclusive of overtime.
- Normal Time Winning Margin - overtime does not count.
- E-Soccer:
 - All game markets are settled based on the official score at the end of regulation time, unless otherwise stated. This includes any added injury or stoppage time but does not include extra-time, time allocated for a penalty shootout or golden goal.
 - Settlement will be based on the official result as declared by the relevant governing body of the specified competition, broadcast, or game API.
 - Bets will be void if the fixture contains the incorrect players/teams.
 - Should a match be abandoned, all markets will be voided unless the outcome has been unequivocally decided.
 - Dates and times of matches shown on the website are for guidance purposes only.



SIS CONTENT SERVICES, INC.

H2H GLOBAL GAMING LEAGUE™

ESPORTS PRODUCT

Integrity, Structure, Operations and Regulations

Version 1.6

January 2025

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INTRODUCTION OF SIS ESPORTS PRODUCT

The SIS Competitive Gaming esports Product is supplied as an end-to-end solution that includes live streamed games and matches, pictures, commentary, on-screen graphics with betting triggers, data, and a range of pre-event and in-play markets and prices. All Games follow best practices outlined by the Esports Integrity Commission (ESIC) in addition to the strict operational measures SIS has in place to ensure that each event is fair. H2H Global Gaming League™ (H2H GG League or H2HGGL) is the esports content and tournament brand used by SIS to distribute its popular esports titles and tournaments to a network of international operators.

SIS operates daily esports matches from the United Kingdom at its primary studio in Milton Keynes, known as the SIS Esports Factory. The format allows SIS to have direct oversight of every aspect of the competition from employing gamer athletes and referees to game regulations to the equipment and facilities.

This document forms a full working guide into the SIS esports operation; it will be amended and updated as the Product expands and titles, job roles, and operational processes are added.¹

¹ A list of common esports terms is provided in Appendix 1.



SIS ESPORTS INTEGRITY

SIS Policy & Strategy

The SIS integrity strategy is built on the following principles:

- Integrity and Respect: Each player must have respect for the officials, opponents, and rules.
- Fair Process: Adopted procedures will be balanced, proportionate, and fair to all parties.
- Implementation, Education, and Enforcement in Standardized Codes: SIS is dedicated to educating players and staff about SIS policies.
- Confidentiality: Issues of integrity will only be shared with those on a need-to-know basis.

The integrity policies covered and discussed with all esports Team Members are:

- Job expectations and behaviors
- Mobile device policy²
- Social media policy³
- Betting at work policy⁴
- ESIC

SIS Esports Integrity Mantra

SIS WILL TAKE STEPS TO PREVENT, DETECT & INVESTIGATE UNUSUAL ACTIVITY

SIS WILL ASSIST REGULATORS AND ESPORTS GOVERNING BODIES

SIS IS TRANSPARENT TO OUR CUSTOMERS AND REGULATORS

SIS IS COMMITTED TO DETECTING CLEAR RULE & INTEGRITY BREACHES

SIS WILL PROVIDE ALL GAME DATA REQUESTED BY CUSTOMERS

² See Communication Devices section on page 3.

³ See SIS Social Media Policy at Appendix 2.

⁴ See SIS U.S. Betting at Work and Responsible Gambling Policy at Appendix 3.



Operational Integrity

As a live broadcast betting product, upholding integrity is crucial to the operation and to our customers. With the following procedures in place, SIS maintains and delivers the standards set by ESIC.

Day-to-Day Integrity

Operating facilities

- Office Security – The SIS building has restrictions of entry and entry can only be gained if someone is a staff member.
- Security Desk Guard – There is a receptionist, or a security guard located at the entrance of each building and access is only granted through them. All visitors to the SIS building are given temporary badges and are announced to each department that is expecting guests or visitors.
- CCTV – There is CCTV located throughout the buildings which is monitored 24/7 and can be viewed within the manager station in the central section of the esports operation. There are also CCTV cameras located specifically within the gaming studios. The retention period for CCTV is ninety (90) days.
- ID Badges – All staff have photo ID badges, which permit access to the building and restrict them from certain locations within the operation. No one can move around the building without having an ID badge.
- Stream recordings – All games are recorded.
- Schedules –
 - Game schedules are sent to customers daily at predetermined times that are approved by operations and trading teams.
 - Game schedules are provided to Gamers at the start of each shift.
 - All games are scheduled via the Schedule Maker. The data is copied from SIS's staff roster, which then automatically populates the list of players for ebasketball and esoccer and categorizes them both by Day and Night shift patterns. For ebasketball specifically, the player's Elo form is also pasted into the sheet which will then assign them to the appropriate stream, based on their skill level.

Communication Devices (mobile phones, smart watches, etc.)

- All communication devices are logged on-site and kept in a phone safe during live broadcasts.
- The use of any device is strictly prohibited in live broadcast studio areas.
- Permission from the shift ops manager is required to retrieve a mobile device during work shifts (such as during breaks) and devices must be returned once finished and signed off via checklist once replaced.
- The shift manager is responsible for the implementation of this process; checks are performed throughout the day and logged to ensure compliance in returning of devices.



- Any player found with a device without permission is subject to a disciplinary process that could result in dismissal.

Shift Manager Visibility and Responsibilities

- Shift managers ensure all policies and procedures are being followed. They provide 24-hour monitoring of the streams going out to customers and of the team in the studios.
- Shift managers will also do spot checks to ensure all integrity rules are in place and all staff are performing their roles.
- Offenders may be subject to disciplinary measures at the discretion of the shift managers.

Studio Rules

- To protect the integrity of games being played, only those participating in the current scheduled game are allowed in the studio. This includes:
 - Two gamers for ebasketball and esoccer;
 - One Referee (unless being trained, then a second Referee is allowed); and
 - Shift manager or senior Referee may enter during live broadcasts to check integrity.
- Team members are not permitted to congregate outside the game studio to prevent distractions and/or interaction with Gamers and Referees engaged in a live game.

Unique Game Settings

- In-game settings are checked at the start of every new shift by management to ensure they are accurate across all streams and follow the appropriate ruleset.
- Every game played has unique in-game settings⁵ (no player fatigue, injury free rosters and superstar difficulty settings) which are in place to ensure match ups are fair to the players.
- To ensure consistency and integrity of the Product these in-game settings are checked by Referees periodically during the normal hours of operation to ensure nothing has been changed.
- When new game versions are released, the game settings are reviewed and updated based on feedback and data from testing phases.

Hardware Integrity

- There are access controls in place to prevent communication with persons outside of the operation during broadcast.
- No player is allowed in the studio without a referee/manager present, to prevent any possible manipulation of equipment.
- No unauthorized software is permitted to be installed; confirmed by daily management checks.
- All PCs are centrally managed by SIS's IT department.

⁵ See Appendices 6 and 7.



Staff Integrity

- To help protect their identity Gamers receive a gamer tag which keeps them anonymous to anyone outside the organization.
- To protect SIS, the product, and its customers, the use of communication devices on site is restricted to prevent the sharing of information about the operation and combat match fixing.
- Employment agreements and contracts include security provisions and prohibitions against sharing of information that could affect the integrity of the Product.
- Esports Team Members that have been sanctioned, disciplined, or blacklisted by ESIC for violations of the player codes or rules are listed in the ESIC Sanctions Register, or 'black book'. The black book is a public register that can be accessed via this link: <https://esic.gg/sanctions/>. During employment, if it is discovered that a Gamer or Referee has had this type of action taken against them, the company will take action in accordance with human resources policies, which could include termination of employment. In addition to this list being consulted during employment, this is also reviewed to ensure that any prospective employee does not appear on the list before they are employed.
- Where applicable, relevant authorities and/or regulators are notified of any suspicion of fraud or cheating within such authority's required timeline.
- SIS has in place a Group Whistleblowing policy and procedure. In addition, due to the importance of integrity and reporting for the esports Products, SIS has in place a separate confidential reporting procedure for Gamers where they can report any suspected match fixing or fraud and these will be reviewed and investigated.

Gameplay Integrity

- The Elo rating system is used internally by SIS to assign a ranking that is used to ensure players are playing against competitors of equal abilities.
- Elo is a scoring system that gives and subtracts points allocated to the players based on who they win or lose to. This system was introduced to ensure games are always as competitive as possible.
- All data is recorded and available to be discussed with the players throughout their shifts, to continue to monitor performance and set expectations with the players.
- The Operations team works closely with the trading team to highlight any unusual match results (for example high/low scoring) and any players of concern and hold weekly meeting where these are discussed at length. Conversations with players about their performance allow SIS to gain an understanding of what is affecting their game play and how a player is improving.
- Reviews are held for both under- and over-performing players as it reminds Gamers that they and their performances are constantly being observed, and performances can be reviewed with them at any time. The SIS reporting system provides opportunity for instant review and feedback sessions based on their previous game if there appears to be some inconsistency in their gameplay. This allows Operations to answer questions raised around the player's performance in a reasonable timeframe.



Measuring Player Performance

- All new Gamers must achieve a 30%-win rate within their first 5 shifts to ensure data collection is accurate and competitiveness is achieved. If this is not achieved the player is removed and given time away from the operation to improve and then re-invited for more data collection.
- All players need to consistently have a monthly win percentage of 30%, performance reviews occur when players dip below this threshold.
- Daily discussions happen with players identified as having poor performance, e.g., low scoring games and visible lack of effort. These discussions will lead to specific actions taking place which may vary from coaching sessions to disciplinary action depending on a player's history.
- If a player's gameplay is flagged for being outside the key performance indicators a full investigation will be triggered and all options of disciplinary action will be up for discussion including termination of contract.

Player Performance – On Stream

- Operations has created a multi-stream operation to create competitive match ups every day using the Elo ranking system⁶. Each session lasts for 12 hours and utilizes 12 Gamers (4 per stream). The current requirements for entry into each level are shown below. Parameters may be adjusted based on results, points available, and number of players.
- Entry points (based on 3 Streams):
 - Top level – Stream 1 (Elo ranking Day: ~1750, Night: ~1700)
 - Mid level – Stream 2 (Elo ranking Day: ~1500, Night: ~1350)
 - Low level – Stream 3 (Elo ranking Day: ~1300. Night: ~1200)
- In addition to individual player ratings, SIS has introduced the concept of team groups. This involves categorizing sports teams into groups based on various factors such as player statistics, team composition, or overall performance. Teams within the same level are considered to have comparable skill levels, making matchups between them more balanced and competitive. SIS aims to create fair and evenly matched gameplay experiences for participants by ensuring that events or matches only feature teams from the same level (group).
- The teams selected by SIS are divided into separate groups (two (2) for ebasketball and three (3) for esoccer) to ensure consistent competitive match ups. This is constantly reviewed, and underperforming teams are analyzed by trading and operations teams. SIS has rolling data for the sports teams used to ensure win rates, margin of victory, total points per game, etc. are accurate. This data is monitored daily to ensure nothing is changing and that no team is an outlier on any given statistic. SIS has built an injury free roster as it allows the teams to remain the same throughout the season and Gamers to develop a better understanding of the teams and the team players within the game.

⁶ See Elo Ranking on page 8.



- Player and team groups are used internally by SIS to produce the matches; they are not published to sportsbook operators, their patrons, or the general public.

Player Incentives

- In addition to their hourly wage, Gamers are incentivized, both for playing and winning on Stream. This model was adopted to make sure that Gamers always give their all.
- All players are incentivized to play to win with higher bonuses for those playing in the top groups. Players can be promoted/demoted based on their Elo score which is focused on their wins and losses against varying opponents. Repeated losses would see demotions where repeated wins would see players move between the groups.
- Players earn bonuses based on the following factors, with total bonus amounts available per game ranging from £1.65 for the lowest level to £7.5 for the highest level (about US\$2-\$10/game):
 - Win a quarter
 - Draw a quarter
 - Win the game

For clarity, a Gamer may be paid a bonus despite having lost a game/quarter. This ensures a player remains competitive throughout the entire game.

Player Metrics

The following metrics are in place and are monitored by operations and trading teams to identify any material or unusual change of player performance (both positive and negative) as well as to allow real time monitoring of results:

- Supremacy
- Elo
- Win rate
- W/L against all team member opponents
- W/L against all tiered teams on stream

Supremacy charts utilized on a daily and weekly basis to understand and analyze scoring data from SIS’s esports matches are shown below.

This chart shows the average points gap for SIS’s ebasketball games that took place on that day and by week:

Week Commencing		29/01/2024	05/02/2024	12/02/2024	19/02/2024	26/02/2024	04/03/2024
Stream 1	Day	10.75	10.63	11.47	11.24	9.45	11.44
	Night	9.47	9.41	9.38	9.65	9.69	9.50
Stream 2	Day	9.38	9.17	10.33	10.24	10.60	10.50
	Night	9.37	9.60	10.09	10.45	11.21	11.61
Stream 3	Day	9.93	8.47	10.15	8.69	7.99	8.34
	Night	10.35	9.74	9.37	10.01	11.23	11.46
Average		9.88	9.63	10.23	10.17	9.99	10.53
Total		133.92	135.17	137.26	137.69	136.98	136.67
Ratio		7.4%	7.1%	7.5%	7.4%	7.3%	7.7%



Esoccer statistics are tracked in a more traditional soccer format using goal difference as the key metric:

	Rank	Matches	Wins	Draws	0-0 Draws	Losses	Winrate	H1 Avg Goals	H2 Avg Goals	Avg H1 Goals Against	Avg H2 Goals Against	Goal Difference	Goal Difference Per Match
LEFTY	1	220	156	17	17	30	70.91%	1.10	1.18	0.46	0.43	305	1.39
DELUXE	2	216	142	21	24	29	65.74%	1.25	1.02	0.55	0.60	244	1.13
ALVSS	3	134	82	24	9	19	61.19%	1.22	0.99	0.46	0.74	134	1.00
SMALLCEE	4	330	170	25	24	111	51.52%	1.10	1.14	0.89	0.92	142	0.43
ZT	5	222	112	15	23	72	50.45%	0.86	0.91	0.68	0.66	94	0.42
JIXTU	6	205	93	21	29	62	45.37%	0.96	0.80	0.82	0.71	46	0.22
AM	7	24	10	4	3	7	41.67%	0.75	0.63	0.54	0.71	3	0.13
KNIZ	8	284	116	19	45	104	40.85%	0.67	0.64	0.57	0.66	22	0.08
MJ	9	239	92	34	33	80	38.49%	0.89	0.77	0.77	0.67	54	0.23
CHAPO	10	29	11	2	8	8	37.93%	0.52	0.79	0.62	0.55	4	0.14
TL	11	69	26	10	12	21	37.68%	0.61	0.72	0.48	0.64	15	0.22
FORWARDPASS	12	121	45	16	12	48	37.19%	0.84	0.97	0.95	0.98	-14	-0.12
PADRINO	13	195	71	26	14	84	36.41%	0.71	0.74	0.78	0.77	-20	-0.10
JABZ	14	127	44	18	10	55	34.65%	0.69	0.89	1.02	0.85	-36	-0.28
DONKEY KONG	15	281	97	27	27	130	34.52%	0.73	0.67	0.80	0.87	-76	-0.27
KLOPPS	16	211	71	23	19	98	33.65%	0.72	0.80	0.89	0.92	-62	-0.29
GHOST	17	15	5	2	1	7	33.33%	1.00	0.60	1.20	0.73	-5	-0.33
BAKISH	18	111	34	16	11	50	30.63%	0.67	0.57	0.68	0.77	-24	-0.22
PACETOBURN	19	121	36	13	17	55	29.75%	0.57	0.60	0.84	0.76	-53	-0.44
CHIMBONDA	20	202	58	22	17	105	28.71%	0.63	0.74	0.94	0.94	-101	-0.50
BLINX	21	127	36	13	13	65	28.35%	0.62	0.61	0.85	0.78	-51	-0.40
BRUCE	22	40	11	3	6	20	27.50%	0.68	0.35	0.93	0.98	-35	-0.88
JWRULES	23	193	41	14	17	121	21.24%	0.48	0.68	1.16	1.05	-203	-1.05
CHALKY	24	247	52	15	22	158	21.05%	0.38	0.49	0.81	0.89	-203	-0.82
DIZ	25	51	8	5	4	34	15.69%	0.47	0.53	1.24	1.06	-66	-1.29
TUGZ	26	100	15	7	17	61	15.00%	0.46	0.42	1.11	0.91	-114	-1.14
Grand Total		4114	1634	412	434	1634	39.72%	0.79	0.79	0.79	0.79	0	

Player Win Rates

- Each player's form is displayed on the screen. For example, W-L-L-W-W which means the player has won 3 of their last 5 games.
- All results are recorded, and results are reviewed weekly to highlight any anomalies.

Elo Ranking

The Elo Rating System, originally developed for chess but now widely used in various competitive activities including esports, provides a numerical rating to quantify the skill level of a player. Each player starts with their current Elo rating and after each match, their rating is adjusted based on the outcome (win, loss, or draw) and the relative Elo ratings of both players. If a player wins against an opponent with a higher Elo rating, their rating increases by a larger margin compared to winning against a lower-rated opponent. Conversely, losing to a lower-rated opponent results in a greater rating decrease. The goal is to ensure fair and balanced matchups by pairing players with similar Elo ratings against each other.

Gamer ratings move constantly through the day; the following chart is a snapshot of mid-shift ELO rankings:

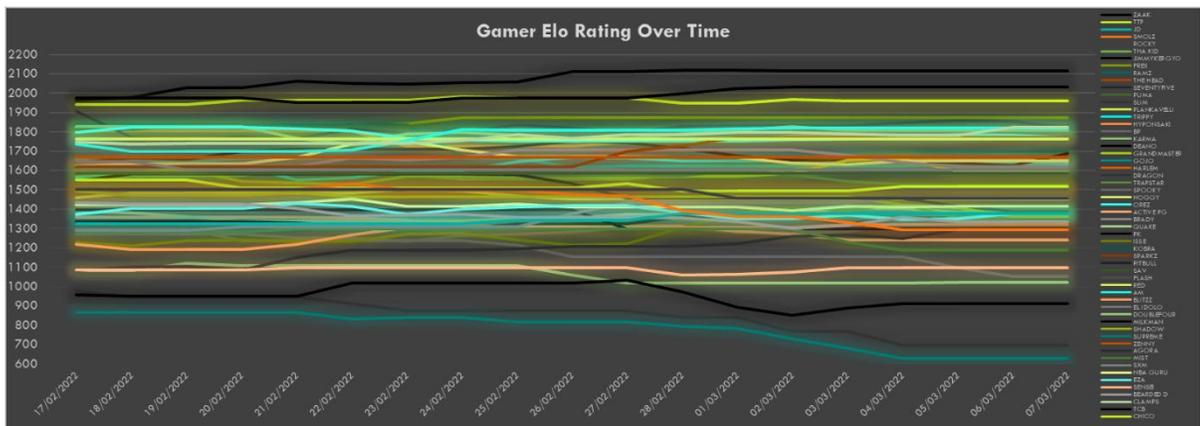
#	Player	Name	Teams	FORM	WINS	LOSSES	WIN %	Average Margin	Max Margin	Min Margin	ELO	ELO Day Change
Stream1 Day	TD24	Samuel A	PHX BOS	L-W-L-W-L	2	3	40%	0.6	19	-14	1742	-3
	VEX	Alex L	GS LAL	W-W-L-L-L	1	3	25%	-11.3	6	-20	1728	-8
	HOGGY	Bradley H	CLE MEM	W-W-W-W-W	4	0	100%	11.5	20	0	2001	10
	AM	Emmanuel G	DAL MIL	L-L-W-L-W	2	3	40%	-0.8	12	-7	1710	1
Stream2 Day	BEARDED D	Dion S	MIL CLE	W-W-W-L-W	4	1	80%	1.8	13	-13	1690	22
	RAMZ	Ramsees A	BOS DAL	L-L-L-W-L	1	3	25%	7.0	36	-5	1645	-23
	THE PROCESS	Toby O	MEM PHX	L-L-L-W-L	1	4	20%	-10.0	13	-36	1576	-18
	SHARPSHOOTER	Tim O	LAL GS	L-W-W-L-W	3	1	75%	3.3	12	-2	1690	19
Stream3 Day	JABZ	Jamie B	DAL MIL	W-L-W-W-L	2	2	50%	-1.3	3	-9	1516	1
	THA KID	Powfil R	CLE CLE	L-W-W-L-L	2	2	50%	-1.0	2	-5	1555	-3
	RASCAL	Marlon N	PHX PHX	L-W-L-L-W	2	2	50%	0.5	5	-3	1472	6
	DIMES	Blake H	MEM GS	W-L-L-W-W	2	2	50%	1.8	9	-2	1612	-4



The following chart shows the relative Elo position of all SIS players. The table is updated with live data after a player finishes their game and the result is confirmed. Elo ratings are never reset and have an ongoing cumulative effect to ensure all games remain competitive and there are no spikes in performance.

Nickname	Wins (March)	Losses (March)	Win%	ELO	Rank	Nickname	Wins (March)	Losses (March)	Win%	ELO	Rank
ZAAK	7	4	63.6%	2103	1.06	TD24	8	2	80.0%	1470	26.03
JIMMYKERGYO	18	6	75.0%	2031	2.07	NBA GURU	13	20	39.4%	1432	27.45
TTP	16	8	66.7%	1976	3.04	PLANKAVELLI	0	0	0.0%	1432	27.24
FREX	0	3	0.0%	1858	4.48	QUAKE	22	17	56.4%	1418	29.14
CLAMPS	22	23	48.9%	1825	5.20	SXM	5	9	35.7%	1416	30.50
AM	12	12	50.0%	1823	6.15	JABZ	6	5	54.6%	1411	31.22
SLIM	27	11	71.1%	1823	6.12	PITBULL	7	17	29.2%	1392	32.46
PUMA	28	18	60.9%	1813	8.13	PK	18	21	46.2%	1392	32.35
SPARKZ	0	0	0.0%	1810	9.24	EZA	24	23	51.1%	1379	34.40
KARMA	13	9	59.1%	1804	10.17	SHADOW	9	16	36.0%	1369	35.37
SMOLZ	17	9	65.4%	1768	11.10	GOJO	0	0	0.0%	1350	36.24
OREZ	19	27	41.3%	1767	12.41	BP	21	13	61.8%	1343	37.34
RED	0	0	0.0%	1752	13.24	ISSE	30	27	52.6%	1342	38.19
RAMZ	15	9	62.5%	1734	14.05	BEARDED D	17	15	53.1%	1320	39.18
DEANO	10	24	29.4%	1707	15.43	BLITZZ	6	5	54.6%	1319	40.39
JD	19	6	76.0%	1701	16.02	AGORA	31	13	70.5%	1303	41.08
HOGGY	23	22	51.1%	1699	17.09	BOCKY	1	9	10.0%	1284	42.52
ZENNY	0	0	0.0%	1668	18.24	MILKMAN	0	0	0.0%	1279	43.24
THA KID	19	11	63.3%	1650	19.16	ACTIVE PG	8	11	42.1%	1225	44.36
BRADY	15	21	41.7%	1635	20.44	MIST	10	18	35.7%	1147	45.42
TRIPPY	9	13	40.9%	1612	21.47	SENSEI	21	11	65.6%	1126	46.11
GRANDMASTER	31	13	70.5%	1598	22.01	DOUBLEFOUR	7	7	50.0%	1033	47.38
EL IDOLO	0	0	0.0%	1565	23.24	SPOOKY	5	19	20.8%	1000	48.53
TRAPSTAR	14	28	33.3%	1546	24.51	TCB	22	28	44.0%	941	49.21
CHICO	11	10	52.4%	1488	25.23	DRAGON	5	20	20.0%	700	50.54
						SUPREME	4	32	11.1%	593	51.49

- All new Gamers start with a baseline Elo of 1000. This score is adjusted based on the player’s own data collection during orientation and thereafter points are gained and lost based on their opponent's level of skill.
- The Elo rating can always fluctuate based on surprising game results or if a player over- or underperforms. Over time the Elo will come to a settled point once it has established itself. The timeline below reflects that most players have flatlined, indicating they are ranked in the appropriate place.





Use of Player Metrics

Elo ranking and skill level designation for each Gamer are used internally by SIS for player matchups and team/game assignments.

These are not published to operators, their patrons, or the general public on the h2hggl.com website. All new players start on the lowest level and work their way up to higher levels at varying pace based on their performance and results. The higher the Elo ranking the Gamer has will help SIS Operations determine which stream they will be playing on for that shift, e.g. Stream 1 will have higher Elo-ranked Gamers followed lower-ranked Gamers for additional Streams.

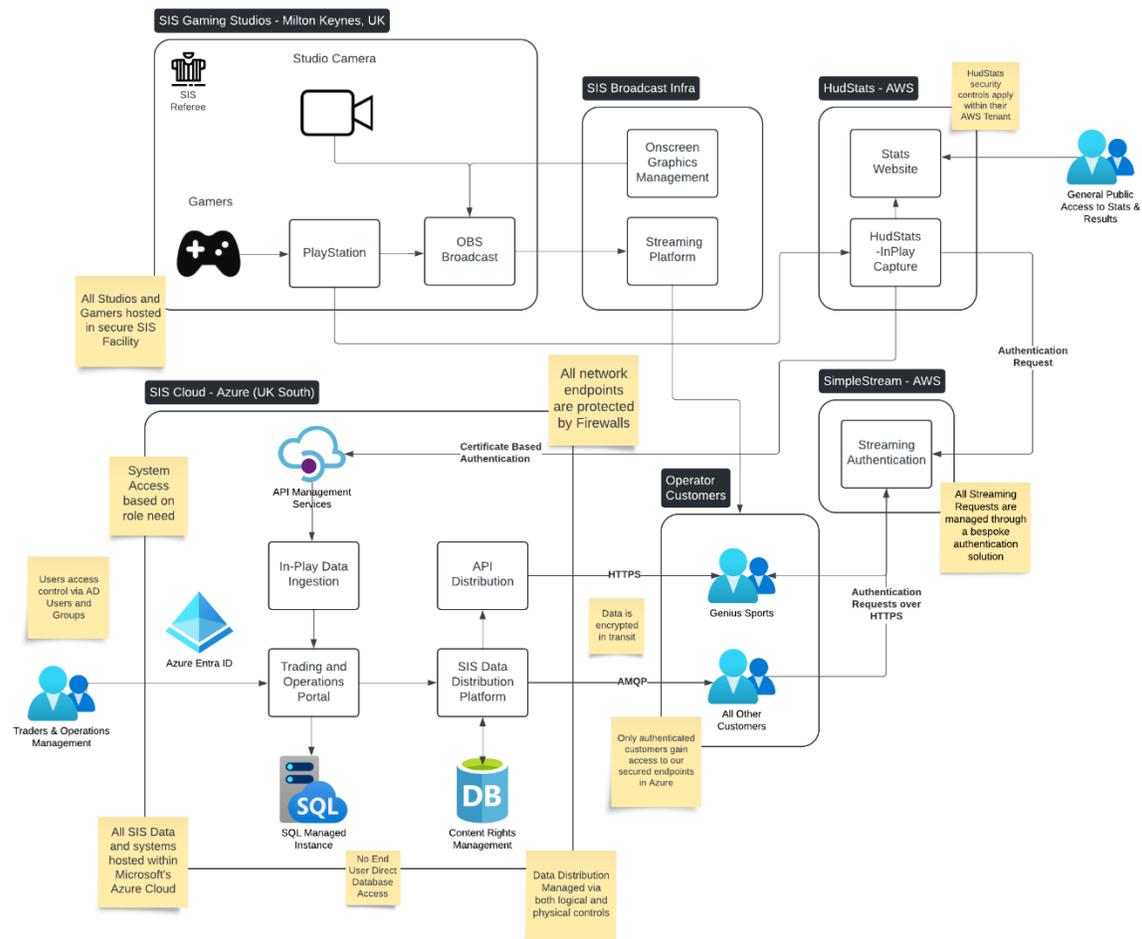
Transparency & Bettor Inquiries

- In order to ensure that communication and transparency are in place for all parties involved in the eSports Products, including account holders (bettors) of SIS customers, SIS has in place a communication mechanism for bettors to contact SIS directly.
- Each email message received from a bettor is reviewed, escalated if required, and once all information has been gathered (or investigation concluded if required), a response will be sent back to the individual.
- A regulator or other authority will be notified of complaints received in line with that regulator's requirements.

Information Systems Architecture and Security

System Architecture

The following diagram provides a general summary of the IT infrastructure utilized to conduct the esports games and depicts the data flow and established controls.



Data Security

All data is securely transmitted in real-time, remaining encrypted in transit until delivered to the end customer (B2B operators, not customer betting patrons) or the public-facing H2HGGL statistics website hosted by HUDstats in AWS. Only authenticated customers gain access to the SIS data distribution platform via individually secured endpoints.



The data is created in AWS by HUDstats, eliminating human inaccuracies. Access to the esports facilities is controlled with strict physical and firewall access. Least privileged user account controls are in place ensuring only authorized personnel have access to production systems.

There are additional security measures in place to prevent tampering, unauthorized changes, or compromise to data. Mitigation procedures are incorporated in a variety of policies maintained by the SIS group.

SIS enforces a secure software methodology with all software scanned for vulnerabilities before promotion to any live environment. This is done before any promotion of software code to production environment, so is done and checked for each production release of software and enforced via the SIS CAB (change advisory board). Penetration testing and vulnerability scans of systems are undertaken periodically as follows:

- Nessus scans are conducted on a weekly basis; and
- PEN testing is performed annually by third parties.

Third Party Due Diligence

All external parties handling SIS's esports data are subject to rigorous Vendor Management checks and reviews. These cover contractual obligations referring to security aspects of confidentiality, integrity and availability of services and data. Additionally, all suppliers and contractors are subject to non-disclosure agreements.

Incident Management

SIS maintains a strict Information Security Incident Management policy. This policy describes responsibilities for all staff, contractors and suppliers in reporting all incidents and assisting in investigations as required, particularly if urgent action must be taken to prevent further damage. Department heads are responsible for compliance in their respective areas and, ultimately, the Information Security Group (ISG) is responsible for ensuring that the incident has been appropriately resolved and lessons learned are implemented.

Information Security Standards

SIS follows the standards and guidelines of ISO27001 to facilitate esports competitions.



Esports Integrity Commission (ESIC)

ESIC describes its role in and approach for esports integrity as set forth below.

About ESIC

ESIC is a non-profit members' association established in 2015 to promote and facilitate competitive integrity in esports. ESIC works with esports stakeholders to protect the integrity of esports competition.

The Mission of ESIC is to be the recognized guardian of the integrity of esports and to take responsibility for disruption, prevention, investigation, and prosecution of all forms of cheating, including, but not limited to, match manipulation and doping.

ESIC exists to unite the industry under the shared values and visions essential to fight against corruption in any form. These values form the basis of the ESIC Program of Integrity measures. Each commission member has subscribed to these core principles so that, while many ESIC Members may be in competition with each other commercially, they are as one when it comes to protecting the sport. Each ESIC Member has signed their commitment to ESIC Principles and ESIC will be diligent in making their regulatory ambitions for the sport a reality through the Codes and Procedures set out in its Program.

ESIC works with its Members to investigate and prosecute individuals who have allegations regarding match-fixing and breach of the Codes of Conduct and Integrity. Should an individual be found guilty of any area of fraudulent play, the individual has sanctioned placed against them or may be banned. Information about these sanctions is available to the public to review and can be found at: <https://esic.gg/sanctions/>. ESIC Members are committed to recognizing and enforcing the sanctions imposed on any person where ESIC or another Member of ESIC has imposed such sanctions using a standard ESIC Code, Policy, Rule or Regulation. ESIC makes available details of investigations that have been declassified for public listing after a third party (usually a party to the investigation or a journalist) has put the matter into the public domain or ESIC has made a public announcement about an investigation for strategic reasons or to enlist public support and information. The list of Open Investigations can be accessed at this link: <https://esic.gg/open-investigations-register/>.

ESIC's Principles

ESIC believes in a strong and vibrant global sport in which all players, professional and amateur, and all industry stakeholders can build a viable and successful career and industry in a safe, competitive and rewarding environment.

ESIC's Principles cover six fundamental areas and give rise to required standards and structures which are vital for the accelerated future success of esports. ESIC's Principles are fair, reasonable and aspirational and are aimed at creating a coherent underlying philosophy for all stakeholders.

They will guide ESIC's future activity, and they will act as a set of benchmarks to which ESIC will be held accountable and will seek to hold the sport and its key stakeholders accountable. Most importantly, each Member of ESIC must agree to and enforce these Principles in their own part of the esports industry as appropriate to the sector they occupy for the overall good of the sport.

ESIC Gold Standard

The Gold Standard for Betting Related Esports Products has been established by ESIC in response to the distinct integrity challenges associated with hosting esports matches specifically tailored for offering betting products



to betting operators and, from there, to betting customers. Gold Standard is only awarded to entities whose products comply with various measures and rules that make up the standard as audited and certified by ESIC, and SIS was certified as having met this standard in 2023.

How SIS uses ESIC

SIS is an Anti-Corruption Supporter. This means SIS shares all data with ESIC if requested or ESIC gives SIS information if something has been flagged as suspicious within the SIS operation. As a global network each ESIC Member's operation is visible to each other Member's operation in terms of match fixing and corruption.

https://esic.gg/members/?member_type=anti-corruption-supporter&status=active

ESIC provides a widely used and commonly agreed anti-corruption code of conduct that SIS adheres to.

Staff Code of Ethics

All SIS staff are expected to conform to the highest standards of honesty, impartiality, equality, and integrity when performing their job duties and responsibilities. In addition to adhering to standard SIS integrity policies, all esports Team Members are expected to conduct themselves in compliance with various ESIC Codes:

- [Code of Ethics \(https://esic.gg/codes/code-of-ethics/\)](https://esic.gg/codes/code-of-ethics/),
- [Code of Conduct \(https://esic.gg/codes/code-of-conduct/\)](https://esic.gg/codes/code-of-conduct/)
- [Anti-Corruption Code \(https://esic.gg/codes/anti-corruption-code/\)](https://esic.gg/codes/anti-corruption-code/); and
- [Anti-Doping Code \(https://esic.gg/codes/anti-doping-code/\)](https://esic.gg/codes/anti-doping-code/).

The SIS Code of Conduct accepted at the time of employment by new staff is a mirror of the ESIC Code of Conduct for esports.

Violations of SIS policies or ESIC Codes constitute offenses that subject the individual to discipline up to and including termination of employment.



SIS ESPORTS STRUCTURE

Esports Team Members

The SIS esports operation includes both full-time management personnel and individuals employed by SIS in two primary operational roles: Gamers and Referees. The following diagram reflects the current organizational structure of the SIS esports operation.



Professional Gamers compete in head-to-head video game competitions conducted at the SIS Factory. Each Gamer is at least eighteen (18) years of age and is a Professional Athlete who brings to SIS their expertise in one of two esports titles: ebasketball or esoccer. The Referees ensure all aspects of the games and play run as planned and athletes compete to SIS standards and expectations. They set up, manage, and keep score for the games while in play and ensure the correct settings and teams are chosen for the next match-up.

Recruitment and Qualifications

As employees, candidates for esports roles are subject to the same general HR recruitment, hiring, and onboarding processes as all SIS personnel, including employment application, pre-employment and reference/background checks, and verification of eligibility to work. Interviews are conducted in two parts: in-person discussion to review background, experience and assess the personality and suitability of candidates to join the SIS esports Team, and a skills-based game play segment designed to assess the gaming abilities.

Additional background checks for esports Team candidates include a review of the blacklist published by ESIC. If a candidate is found to have been sanctioned or disciplined, SIS will not offer such individual a position.

Job Descriptions and the SIS Recruitment Policy are set out in Appendix 4 and Appendix 5, respectively.



Interviews and Hiring

Gamer

The interview for Gamer candidates includes two game play segments. Games are played in live conditions using the ebasketball or esoccer game rule set and teams. Two games are played against computer opponents. Any candidate who loses against the computer does not meet the standards of SIS's professional play and will not progress to the next stage. Those that win play three games against other SIS Gamers to further assess the player's skills. The candidate's performance is analyzed by management, who decide whether to offer a placement.

Referee

Referee candidates will review a recorded game to demonstrate their skills, including their abilities to input scores correctly and identify suspicious elements within the game. The recording includes "bad" game element examples in order to test the candidate's awareness of improper game play and knowledge of the rules of the game. Candidates that pass the skills test and who present a strong-minded and confident presence will be offered employment with SIS.

Orientation (Days 1 and 2)

Day 1 for all new Team Members begins with standard SIS new-hire orientation and welcome presentation that includes a history of the Product, role expectations, integrity rules, and operational processes. Thereafter, orientation continues specific to each Team Member's role.

Gamer

On their first day, new Gamers will play 10 games in live conditions against other SIS Gamers of various skill levels. SIS collects data on each Gamer from the first day of play in order to activate the player's ranking. Games are played before a Referee or Shift Manager to ensure (a) the integrity and accuracy of the data collected for the Gamer, and (b) that each new Gamer puts forth their best effort as if the games were live and on broadcast. Day 1 is complete after all games have been placed and data has been collected.

On Day 2, Gamers will play live games on broadcast. At the end of Day 2, they will have an Elo score that reflects their natural skill ranking based on the day's performance. This Elo is then used as reference for future ranking.

Referee

Orientation days consist of training and operation of the tools and systems used by SIS. On the first day, new Referees will review referee training decks and shadow senior team members. They are introduced to the basics of the SIS esports operation and the daily processes involved with running the games that they will take control of.

A Referee will be paired with a veteran Referee for their second shift. Once the new Referee has shown good understanding of the game set up instructions and integrity guidelines, they are permitted to take control of live broadcasts as part of their training. Performance is reviewed with them after each game, until a senior Referee determines they are sufficiently trained and confident to perform the role on their own.



Expectations and Responsibilities of Each Role

Gamer Role – Expectations

- To always play to the best of their ability, to play to the final whistle.
- To play honestly and within the rules and SIS guidelines.
- To be respectful to all team members during the games, leave what happens during game play in the arena, and to be competitive on-stream without engaging in verbal assaults, bullying, harassment, or other negative behaviors.

Referee Role – Expectations

No game is run on-broadcast without a Referee present to protect the integrity of the game and SIS esports Product. Referees must ensure that the operation and integrity of the games are in line with established procedures, rulesets, and SIS standards, and that the rules of play are adhered to and enforced.

Referees set up all matches on their assigned stream for the day and are essentially the ‘supervisor’ of the stream. Gamers will be working from the Referee’s count in order to start matches on time and to ensure all of the integrity checks have been completed prior to starting a live game.

Setting Up a Game

The Referee is responsible for checking the game has been set up appropriately prior to each live broadcast.

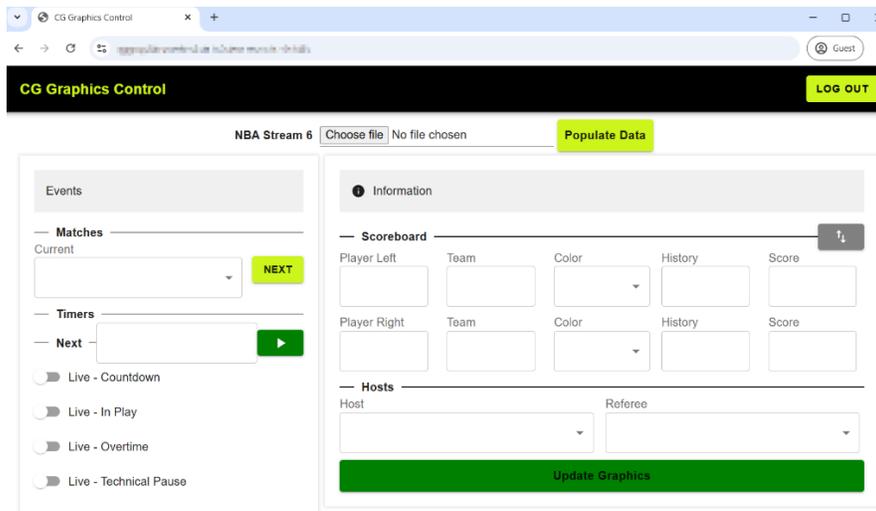
The teams selected follow the daily schedule which pulls match data from the Schedule Maker. This data is copied into the Live Score Report Sheet document which is the primary worksheet for referees to input real-time scores and data during the live broadcast of matches.

Controllers and all hardware are checked by the Referee at the start and end of each game to ensure no tampering has occurred. No equipment is removed from the broadcast environment unless it has been authorized by the operations team.

The Referee takes their seat, calls the Gamers for the game to be played, and ensures that the players take the seats assigned in the game schedule.

After all checks have been completed, the Referee puts the game details into software developed in-house. This software then controls a third party hosted graphics system. This allows the Referee to update each match with the correct Gamers, teams and current form, which is output live on the broadcast.

Example of program screen:



Live Score Report Sheet

The live score report sheet is used by the Referee to input real-time scores and data for each game to allow instant updates to the trading team. Each game result is recorded so that all game data can be reviewed for training or other purposes: new patterns of play or scoring, players of concern, and how the in-game teams are performing. The document is archived in a Microsoft Teams folder and a new Live Score Report Sheet starts at the beginning of each month.

The data is used to review Gamers' statistics, such as individual/team win percentages, head-to-head records, and other feedback from gameplay that indicates their strengths/weaknesses within the game. This data is also used to track and update their Elo rating. There are built-in stream and integrity checks within the live score sheet considering the 'big four' elements that should be reviewed while each game is live. These include:

- **Graphics:** to ensure that the correct players, teams, colors, and forms are correct on the stream (can be seen via on preview screens at the Referee's operations desk).
- **Players and Teams:** to ensure that the correct players and teams are selected for the broadcast based on the daily game schedule.
- **Cameras:** to ensure the cameras are pointed correctly at all Gamers and Referees. The Referees have functionality of the cameras, and can control the pan, zoom and tilt to ensure faces are seen on the broadcast.
- **Scores:** to ensure that the score input is accurate and correctly reflected on the live scores document, on screen during the game, and on the end holding screen display at the end of the game (winner/loser).



The sheet is automated to calculate quarterly scores and populate winner/loser at the end of each game based on the Referee’s input as the game progresses.

Example of Pregame Status of Live Score Report Sheet (ebasketball game):

Match 16		Over 100?	Scores End of Quarter							
AM (LAC) v HOGGY (GS)		FALSE	Q1	Q2	Q3	Q4	OT1	OT2	OT3	OT4
	Left	AM								
	Right	HOGGY								
Big 4 Checks										
Graphics										
Players & Teams		Winner	Scores per Quarter							
Cameras		-	Q1	Q2	Q3	Q4	OT1	OT2	OT3	OT4
Scores		AM	0	0	0	0	0	0	0	0
		HOGGY	0	0	0	0	0	0	0	0
Referee Comments		Match Status	AM				HOGGY			
			0				0			

Besides recording data in the live score sheet, the Referee must maintain a sharp focus during the live game to ensure that the broadcast runs smoothly, that any questionable gameplay is identified and that they remain in control of the game at all times.

The Referee maintains a direct line of communication to both the trading and operations teams, which allows them to raise any concerns around the broadcast, such as issues with player behavior on stream or equipment malfunctions. By using a Microsoft Teams chat channel, this can be done with minimal distraction and disruption of the Referee’s activities.

Finally, the Referee is responsible for overseeing the Gamers’ behavior on-stream, both on- and off-camera. Passion and enthusiasm are encouraged, but the Referee will step in (or involve an operations manager) if a player’s behavior is not in line with SIS standards and expectations.



SIS ESPORTS GAMES AND OPERATION OF MATCHES

Esports Games

There are two SIS esports titles currently available for broadcast: esoccer and ebasketball.

- Ebasketball is a simulation video game based on basketball.
- Esoccer is a simulation video game based on standard soccer.

Esoccer and ebasketball games are played head-to-head, one Gamer vs one Gamer. Gamers are assigned to leagues and are scheduled games daily to compete against those with similar skills to keep the SIS Products competitive.

Information about each of the SIS titles is set out in Appendices 7 and 8.

Operation of Matches & Game Setup

All matches are played under strict rules, and every game is played under the observation of a Referee.

A daily schedule is created and displayed each day for all players to see who their opponents are and which teams they will be playing with/against for the day. Schedule maker software is used by the management team to produce daily assignments – all assignments are random. No internal Gamer skill rankings or team group designations are visible to operator customers, their patrons, or the general public.

- ebasketball has 4 Streams, with two broadcasting 24/7.
- esoccer has 3 Streams broadcasting 24/7.

Additional Streams may be added and broadcast hours extended.

Dedicated Results Website

Scores and results for H2HGGL ebasketball and esoccer matches can be accessed online at www.h2hggl.com. The website, published by SIS, allows the general public, operators, patrons, and other interested parties to access and verify information.



SIS ESPORTS FACILITIES and EQUIPMENT

Facilities

The esports operation is broadcasting out of the SIS Esports Factory located in Milton Keynes, United Kingdom. Where applicable, a regulator or authority may access these premises in order to carry out any of its powers of inspection in line with such party's statutory authority. Reasonable advance written notice shall be provided in line with SIS security processes to ensure availability of relevant personnel.

Operational Equipment

Studio Hardware

Stream PC

Each stream has had a custom-built streaming PC created which captures the content from the gaming consoles and then allows the stream to be distributed out through the SIS network.

Each stream PC has in use the following software:

- OBS Studios: the beating heart of the stream, OBS is stream-based software which allows the user to create multiple scenes, which are then utilized on streams from scenes such as "coming soon" screens to full gameplay capture.
- Elgato Key light: this software allows SIS to connect to each light independently and configure the lights to the desired specification.
- Companion: this software is an adaptation of another software known as Elgato stream deck. It allows the user to create a remote control to control elements of the stream in this case, scenes through OBS, the key lights and the cameras used in the studio.

Elgato Key Lights

Each chair situated within the studio uses two lights which are known as Key lights from the brand Elgato, these lights allow us to highlight users faces better than traditional lighting and gives a more professional effect.

Elgato Stream Decks

These have been customized from the normal usage of stream decks using software known as Companion to allow full remote control of OBS, the Key lights, and the cameras in the studios.

Broadcast Cameras

These cameras have a 360 rotation and 180 degrees angling available, meaning that the cameras can always be adjusted to capture the right image.

Basic User PC

This PC is used by the Referee to access documents and resources, Microsoft Teams channels and any other access needed to communicate with the operations staff.



[Gaming Console](#) (1 per studio): one console.

[Gaming controllers](#) (3 per studio): three controllers.

[Live Stream Broadcast](#)

The SIS Factory has a broadcast team in place for SIS's other content that extends to the esports operation. Access to broadcasting and technical support is provided during operating hours of the esports Product.

[Latency](#)

The broadcast is a robust, low latency, synchronized video that provides lengthened betting windows and new engagement opportunities for bettors, while minimizing chances of past post wagering.



Trading

Structure & Roles

Head of Competitive Gaming

Sits above both the Trading Sports Manager and Regional Operations Manager and acts as the head of the entire competitive gaming (CG) esports Product from both an Operations and Trading perspective.

Trading Sports Manager

Reports to the Head of Competitive Gaming and is responsible for the day-to-day management of the CG Trading team.

CG Trader

Traders who report to the Trading Sports Manager and are responsible for providing expertise in their relevant specialized areas. These areas are Trading, Analysis and Support. SIS has a Senior Trader who specializes in trading and is responsible for reviewing current trading practices, reviewing client performance with the Product team and suggesting improvements based on their findings. An Analysis specialist who is focused on the reporting of data not just for trading but also to the SIS Factory and supporting the SIS prediction model. Finally, a senior trader specializing in support is vital in monitoring and maintaining the integrity of the trading Product and communication with the SIS Factory and clients. The remainder of the team are responsible for the day-to-day running of operations as set forth below.

Trader Onboarding

CG Traders spent their first three (3) days with each of the Senior Traders, outlining the specific roles they will be involved with (ebasketball trading, esoccer trading, Support). They then shadow CG Traders for a further week before meeting with each of the Senior Traders again, who sign them off as able to trade live. CG Traders sign a similar set of guidelines and rules that are required of employees of the SIS Factory.

Day to Day Operations

There are at least two CG Traders actively monitoring matches (either trading or providing support) 24 hours a day, 7 days a week.

- Pre-match Predictions – Using historical data of Gamers/teams along with a prediction model to generate a pre-game prediction for each game. This will be in the form of a point expectancy for each team in ebasketball and a goal expectancy for each team in esoccer that can be used as a basis for the live model.
- Trading Games in-play – Inputting pre-match predictions into the live model and then inputting scoring data will generate live odds for all of our clients. The trader monitors the odds being generated with adjustments occurring based on player performance and flow of game.
- Any observations of Gamers playing differently from SIS predictions or any unusual betting patterns are relayed to SIS Factory and lead to further review. The trading team are the front line for this review. This might be information through bet tickers, customer contact about certain events or statistically gamers/games not in-line with predictions. Further reviews would initially be between the senior trading team and operations management, but this may be escalated to head of trading, operations and product.



- Traders have a direct line to the Referees at SIS Factory through Microsoft Teams and they use this to raise any questions they may have in real time.
- Specific Customer Support Traders are in direct, constant contact with clients and relay important information and answer any questions clients may have. Information relayed may include scheduled maintenance downtime, cancelled games or late notice schedule changes. Traders will regularly answer requests regarding settlements, score confirmations or other general inquiries.
- The Customer Support Traders also act as another pair of eyes to oversee all of the games being broadcast from SIS Factory.
- Traders will double check schedules generated by SIS Factory to ensure they meet the strict requirements for competitive gaming.



APPENDICES



Appendix 1 – Glossary of Esports Terms

Broadcast	The outgoing game footage
Cartography	System to put overlays onto the broadcast
Elo Ratings	Player ratings system to determine daily ranking
Gamer	Staff member who plays ebasketball or esoccer
Latency	Difference in time between live broadcast live viewing
Operations Manager	Senior manager onsite in Milton Keynes
Prediction Model	Used by traders to create pregame prices based on previous data
Referee	Staff member who upholds game integrity
Schedule Maker	Software used to create the customer schedule from the staff roster
Shift Managers	Managers who run operations at the SIS Factory
SIS Esports Factory or SIS Factory	Site where games are played
Stream	Game broadcast
Supremacy	Gamer rating based on competitiveness
Trading Team	Team of traders working from London office



Appendix 2 – SIS Social Media Policy

SIS Betting Social Media Policy

Introduction

Staff at SIS are permitted to access social networking websites during their working time, either through SIS's IT systems or via their own personal equipment.

This social media policy details the rules governing the use of social media during working time by all staff at SIS.

The policy sets out how staff must behave when using SIS's business social media accounts. It also sets out the rules governing use of personal social media accounts during working time, and provides clear guidance on what staff are permitted to write about SIS and/ or their colleagues on their personal social media accounts. This policy should be read alongside other relevant SIS policies, such as the Mobile Telephone Policy, which can be found within the HR Policies & Procedures section on the Intranet.

This policy does not form part of any employee's contract of employment and SIS may amend it at any time.

Why this policy exists

Social media can bring significant benefits to SIS, particularly in relation to building relationships with current and potential bookmaking customers, horseracing and greyhound racing authorities, rights holders, and other suppliers.

However, it's important that all staff who use social media during their working time on behalf of SIS as part of their role, or for personal use, do so in a way that enhances SIS's reputation and long term prospects. Only authorised staff members are permitted to use SIS's business social media accounts (see below).

Social media allows people to blur the lines between professional and personal. However, a misjudged status, comment or update has the potential to generate complaints or damage SIS's reputation. There are also integrity, security and data protection issues to consider when posting any information on social media.

This policy explains how all members of staff can use social media safely and effectively.

Policy Scope

This policy applies to all employees, officers, consultants, contractors, interns, casual workers and agency workers at SIS who use social media – no matter whether for business or personal reasons. It applies whether that social media use takes place on company premises, while travelling for business or while working from home.

Social media sites and services include (but are not limited to):

- Popular social networks like Facebook and Twitter;
- Online review websites like TripAdvisor and TrustPilot;
- Photographic social networks like Flickr and Instagram;

- Professional social networks like LinkedIn and SunZu;
- Sharing networks such as Google+ and YouTube.

Responsibilities

Everyone who operates or contributes to a social media account on behalf of SIS or uses their own personal social media accounts during working time has a responsibility to adhere to this policy. However, the following people have key responsibilities:

- The Data Protection Compliance Manager is ultimately responsible for ensuring that all staff at SIS use social media safely, appropriately and in line with the company's objectives and policies, including this Social Media Policy.
- The Head of Technology Operations is responsible for providing apps and tools to manage SIS's social media presence. They are also responsible for proactively monitoring any social media security threats.
- The Head of Marketing is responsible for brand protection, and the deployment of marketing ideas and campaigns through SIS's social media channels. The Marketing Team will also monitor any mention of SIS on social media and alert the Customer Services Team to follow-up where necessary.
- The Service Desk Manager is responsible for ensuring that requests for assistance and support by customers made via social media are followed up appropriately.

This policy reflects the law and SIS's practice as at 1 February 2016. Staff are invited to comment on this policy by contacting the Data Protection Compliance Manager.

Basic Advice

Regardless of which social networks staff are using, or whether they are using business or personal accounts during their working time, following these simple rules will help avoid the most common pitfalls:

- Know the social network: staff should spend time becoming familiar with the social network they are using before contributing. It's important to read any FAQs on the site and understand what is and what is not acceptable on a network before posting messages or updates.
- If unsure, do not post: staff should err on the side of caution when posting to social networks. If a member of staff believes that an update or message might cause complaints or offence – or otherwise be unsuitable – they should not post it. Staff members can always consult the Marketing Team for advice on what posts are acceptable/ appropriate.
- Be thoughtful and polite: many social media users have got into trouble simply by failing to observe basic good manners online. Staff members should adopt the same levels of courtesy used when communicating via the SIS corporate e-mail platform. This includes the tone and language used – abusive, offensive or derogatory language is not acceptable. Staff should also be aware that social media posts, like email communication, can be easily misinterpreted.

- Look out for security threats: staff members should be on guard for social engineering or 'phishing' attempts. Social networks can also be used to distribute spam and malware. Further details about this are provided below.
- Keep personal use reasonable: although SIS accepts that staff who are active on social media for business purposes can provide a valuable contribution to the business, staff should exercise restraint in how much personal use of social media they make during working hours.
- Don't make promises without checking: some social networks are very public, and staff must not make any commitment or promises on behalf of SIS without checking that SIS can deliver on the commitment/ promise, and without having the express authority from the appropriate person in SIS to make the commitment/ promise. Always direct any enquiries to the Data Protection Compliance Manager.
- Handle complex queries via other channels: social networks are not a good place to resolve complicated enquiries and customer issues. Once a customer has made contact via social media, staff should refer any questions to the Customer Service Team.
- Don't escalate things: it's easy to post a quick response to a contentious status update and then regret it. Staff should always take the time to think before responding, and hold back if they are in any doubt at all.

Use of SIS social media accounts

This part of the social media policy covers all use of social media accounts owned and operated by or on behalf of SIS.

Authorised Users

Only staff members authorised to use SIS's social networking accounts may do so.

Authorisation is provided by the Head of Marketing. It is typically granted when social media related tasks form a core part of a staff member's role, but express authorisation is still required, even if a staff member's job description refers to use of SIS's social media accounts.

Allowing only authorised staff members to use SIS's social media accounts ensures that SIS's external social media presence is consistent and cohesive, and all content that is sent out is approved messaging.

Creating social media accounts

New social media accounts in SIS's name must not be created unless approved by the Head of Marketing.

SIS operates its social media presence in line with a strategy that focuses on the most appropriate social networks, given available resources.

If there is a case to be made for the opening of a new account, staff should raise this with the Head of Marketing.

Purpose of SIS social media accounts

SIS's social media accounts may be used for different purposes.

In general, staff authorised to use SIS's business social media accounts must only post updates, messages or otherwise use these accounts when such use is clearly in line with SIS's overall business objectives.

Only staff members, subject to authorisation from the Head of Marketing, may use business social media accounts to:

- Respond to customer enquiries and requests for help;
- Share blogs, articles and other content created by SIS;
- Share insightful articles, videos, media and other content relevant to the business but created by others (subject to any third party restrictions);
- Promote marketing campaigns;
- Support new product launches and other initiatives.

Social media is a powerful tool that changes quickly. Staff are encouraged to think of new ways to use it and to put those ideas to the Marketing Team, but all use must be expressly authorised.

Inappropriate content and uses

SIS's social media accounts must not be used to share or spread inappropriate content, or take part in any activities that could bring SIS, its officer and/or staff members into disrepute.

Prior to sharing an interesting blog, article or piece of content, staff must always review the content thoroughly, and should not post a link based solely on the headline alone.

Use of personal social media accounts during working time - The value of social media

SIS recognises that the use by staff of personal social media accounts can generate a number of benefits. For example:

- Staff members can make industry contacts that may be useful in their jobs.
- Staff members can discover content to help them learn and develop in their role.
- By posting about SIS and its business, staff members can help to build the business' profile online.

As a result, SIS is happy for employees to spend a reasonable amount of time using their personal social media accounts during working time.

Personal social media rules

Acceptable use:

- Staff members may use their personal social media accounts for work-related purposes during regular hours, but this should not affect the staff member's ability to perform their regular duties to the expected standard.

Talking about SIS

- Staff members are welcome to associate themselves with SIS in order to fulfil their job requirements, for example: by including their job title in their profile. Should staff choose to network, respond to comments and take part in industry discussions, staff should not make any derogatory comments about SIS. Staff should not respond to negative comments, but should notify Marketing.
- Staff that do not have SIS business social media accounts, but reference SIS in their social media profiles, should ensure that their social media accounts do not appear to represent SIS's views or opinions, by including this disclaimer in their social media profiles: 'The views expressed are my own and do not reflect the views of SIS'.

Safe, responsible social media use

The rules in this section apply to:

- All staff members who use SIS's business social media accounts;
- Staff members using personal social media accounts during working time.

Staff members must not:

- Create or transmit material that might be defamatory or incur liability for SIS;
- Post messages, status updates or links to material or content that is inappropriate

Inappropriate content includes (but is not limited to): pornography, racial or religious slurs, gender-specific comments, information encouraging criminal skills or terrorism, and materials relating to cults, gambling and illegal drugs;

This definition of inappropriate content or material (and/or inappropriate behaviour) also covers:

- any text, images or other media that could reasonably be considered to have the potential to offend someone on the basis of race, age, sex, religious or political beliefs, national origin, disability, sexual orientation, or any other characteristic protected by law;
- Use social media for any illegal or criminal activities;
- Sending offensive or harassing material to others via social media;
- Broadcasting unsolicited views on social, political, religious or other non-business related matters;
- Interacting with SIS's customers or competitors in any way which could be interpreted as being offensive, disrespectful or rude;
- Discussing colleagues, competitors, customers or suppliers without their approval;
- Posting, uploading, forwarding or linking to spam, junk email or chain emails and messages.

Copyright

SIS aims to ensure compliance throughout the business with all applicable laws, including those relating to the protection of copyright. Users may not use social media to:

- Publish or share any copyrighted software, media or licenced content (including but not limited to betting data), unless in receipt of written permission from the third party rights holder;
- Share links to, upload, or in any way distribute or deal with illegal copies of music, films, games and other software.

Security and data protection

Staff members should be aware of the security and data protection issues that can arise from using social networks (see Data Protection Policy within the HR Policies & Procedures section on the intranet).

Maintain confidentiality

Staff members must not:

- Share or link to any content or information owned by SIS or a third party that could be considered confidential or commercially sensitive;
- Share or link to data in any way that could breach SIS's data protection policy;
- Change SIS's social media accounts without authorisation. This is the responsibility of the Marketing Team. SIS's business social media accounts should be protected by strong passwords that are changed regularly and shared only with authorised users;
- Staff must not use a new piece of software, app or service with any of SIS's social media accounts without receiving approval from the Head of Technology Operations;
- Staff should watch for 'phishing' attempts, where scammers may attempt to use deception to obtain information relating to either SIS's business or its customers;
- Staff should avoid clicking links in posts, updates and direct messages that look suspicious. In particular, staff should look out for URLs in generic or vague-sounding direct messages.

Policy enforcement

Monitoring social media use

SIS's IT and internet resources – including computers, smartphones and internet connections – are provided for legitimate business use only, although personal use is permitted to the extent expressly set out in the Information & Communications Technology Policy.

SIS reserves the right to regularly monitor how social networks are used and accessed through these resources in accordance with SIS's Information & Communications Technology Policy.

Additionally, all data relating to social networks written, sent or received through SIS's network and computer systems becomes part of SIS's records.

The company can be legally compelled to show that information to law enforcement agencies or other parties.

Potential sanctions

Breach of this policy may result in disciplinary action up to and including dismissal. Any member of staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details. Staff may also be required to remove any social media content that SIS considers to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Where appropriate, SIS may involve the police or other law enforcement agencies in relation to breaches of this policy.



Appendix 3 – SIS US Betting at Work and Responsible Gambling Policy

SIS Content Services, Inc.
Betting at Work and Responsible Gambling Policy

Version #1

Dated: Effective March 1,2024

Last reviewed: N/A

Person responsible: Kira Mendelsohn, Head of Compliance and Regulation (SIS Group)

Background

When the SIS Group was established in 1986 by the 4 largest UK bookmakers at the time, those shareholders were concerned that the integrity of the Group’s operations should be beyond any possible criticism. This concern arose from the fact that a business formed by the major bookmakers to provide betting content and data to the rest of the market had to be seen as operating at the highest levels of integrity in order to displace any suspicion that SIS’s output in any way favored its shareholders to the detriment of other operators.

On two occasions (in 1989 and 1998) concerns were raised by the Monopolies and Mergers Commission (now the Competition and Markets Authority) about the possibility of the bookmaker shareholders having an undue influence over the SIS Group. Ever since that time (and continuing today) the competition authorities have monitored the Group’s activities to ensure that it does nothing to distort the market, particularly in relation to the prices it charges for its services and the prices it supplies to the market.

In late 2020, a SIS Group company, 49s Limited, was granted licenses by the U.K. Gambling Commission to supply virtual products to online markets. As a Commission licensee, 49s is subject to an over-arching obligation to conduct its betting market operations in a fair and open way but the wider SIS Group has taken the view that each Group company should conduct itself as if all its activities were covered by a Gambling Commission license.

The above is a summary of the driving principles that underpin the SIS Group’s approach to betting at work and responsible gambling, and the foundation of the Group’s Betting at Work Policy. With the expansion of its business, it was decided in January 2024 that SIS Content Services, Inc. (“**SIS**” or the “**Company**”) should have its own policy to address considerations specific to U.S. companies and employees, as well as the U.S. betting market.

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SIS is dedicated to providing information and guidance to safeguard our employees and the markets where we operate. As a holder of (or applicant for) licenses in various states, the Company is committed to meet all its obligations and responsibilities as a license holder, and to ensure that responsible gambling and the protection of vulnerable people is taken into account in the operation of its business and provision of its services. Conducting itself in a way that supports and promotes integrity and fairness is key in ensuring that SIS Group offerings meet the highest industry standards.

Status of this Policy

This Policy has been approved by the SIS Content Services, Inc. Board of Directors.

This Policy applies to all Company employees. Compliance with it is mandatory.

This Policy is not part of the contract of employment. It is a condition of an individual's employment or engagement that they adhere to the rules of the Policy. Any breach of this Policy will be taken seriously and may result in disciplinary action, up to and including termination in accordance with the Company's disciplinary policy.

SIS may amend this Policy at any time to reflect changes in the law and the nature of its operations.

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Section A: Betting at work

Management appreciates that many SIS personnel will have an interest in racing, sports and betting. In view of the Company’s business activities, it is important for all employees to appreciate the special relationship between SIS and the betting industry generally, and specifically to understand that certain restrictions have been put in place to protect individuals’ and SIS’s reputation alike in relation to betting on events covered in SIS’s services, particularly during operational hours.

Definitions:

“Direct Influence”: means being involved in (a) the creation, collection, evaluation, reporting, transmission or any other processing of Event Related Information; or (b) the playing or refereeing of esports Events. Individuals with Direct Influence include: data ops, on-course staff, traders, any person in the Product team who is responsible for acquiring and/or managing live content, and esports Gamers, Referees and Shoutcasters.

“Event”: means any live horserace or greyhound race, a live numbers draw, a virtual race or an esports (competitive gaming) event included in any SIS Service.

“Event Related Information ” means in relation to any Event the whole or any part of pre-race data, raceday data, esports data and events, or the results of a draw, in relation to a live numbers draw.

“SIS Service” means a product or service offered by the Company for sports betting.

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Policy principles:

1. Employees are subject to a general restriction on placing or facilitating bets where to do so could compromise (or could be perceived as compromising) the integrity of the Company or the SIS Group, or the integrity of sports betting or event wagering in a particular state.

2. All employees must comply with the betting and gambling laws, rules, and regulations of any U.S. state and any customer's terms and conditions restricting the placement of wagers.

3. An employee with Direct Influence is not permitted to place a bet on any Event where the individual has Direct Influence in relation to the Event.

4. An employee is not permitted at any time to place a bet personally, ask any other person to place a bet on their behalf, or place a bet on another person's behalf:
 - on any Event where SIS has generated a price for such Event
 - on any Event produced by a SIS Group company
 - on any Event supplied to a customer of the Company that is included in a SIS Service
 - with any customer of the Company on any sports event
 - where doing so could potentially affect the integrity of sports betting under the laws of a state where the Company is offering a SIS Service

5. A Company employee shall not at any time divulge information in relation to any Event to any other person to enable that person to place a bet on that Event personally or on behalf of a third party in circumstances where the information confers an unfair advantage on the recipient (in other words, disclosure of inside information).

6. Subject to the foregoing, Company employees are allowed to bet at their discretion during their own time. During working hours, betting should be limited to times when an employee is taking a break.

There will inevitably be instances where a case does not fall neatly into the principles set out in this Policy. Where there is any doubt, a Company employee should always seek guidance from their manager before placing a bet, rather than just relying on their own judgment.

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Managers should refer any cases they are unable to resolve to their senior management team (SMT) member.

A list of FAQs to illustrate the principles set out above is attached as an Annex to this Policy.

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Section B: Responsible Gambling

Safer Gambling:

- Play sites for fun and entertainment, not for making money
- Know your limits, and be clear about them before you start betting. If you feel you may get carried away, set your limits using the responsible gambling tools offered by Operators
- Only gamble with money you can afford to lose
- Make sure to take a break and, if you want to stop gambling, use tools available on wagering sites to set breaks and/or self-exclude
- Don't chase your losses
- Ensure a well balanced lifestyle where gambling is fun among other interests and hobbies
- Don't gamble when you are upset or depressed or to escape from stress or boredom

Safer Gambling tools:

Many operators have in place various safer gambling tools that can be implemented by you to help control your gambling. These vary depending on site and location, but can include tools like reality checks, deposit limits, time out, and self-exclusion.

Please visit the links below to find other ways to keep gambling responsible:

- <https://responsibleplay.org/>
- <https://www.responsiblegambling.org/>

Self-Assessment Test:

If you are concerned you or someone you know may have a gambling problem or that gambling is having an impact on your life, you can complete a self-assessment test on the following websites:

- <https://responsibleplay.org/#gamalyze>
- <https://www.responsiblegambling.org/for-the-public/safer-play/self-assessment-quiz/>

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Filtering Software:

If you would like to restrict your own access to gambling websites or you have a person under the age of 18 who may have access to your device, you may wish to consider installing filtering software to prevent access to gambling websites. The software available at the websites below or on mobile phone apps may block or filter gambling websites depending on the type chosen:

- gamban.com
- betfilter.com
- betblocker.org

Your financial institution may offer a block on transactions that are categorized as gambling – whether you’re gambling online or at a physical venue. Please contact your bank to inquire about these tools/settings.

Confidential Advice, Guidance and Support Services:

For further advice or if you have any questions on problem gambling, you can contact any of the following organizations:

- National Council on Problem Gambling: <https://responsibleplay.org>
- National Problem Gambling Helpline: <https://www.ncpgambling.org/help-treatment/>
Call: 1-800-GAMBLER
Text: 800GAM
Chat Online: <https://www.ncpgambling.org/help-treatment/chat/>

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Section C: Cheating

In keeping with its role as a responsible provider of gambling content, the SIS Group has a policy of zero-tolerance towards cheating, applicable to all employees. The definition used is that outlined in Section 42 of the UK Gambling Act 2005:

1. *A person commits an offense if they —*
 - (a) *cheat at gambling, or*
 - (b) *do anything for the purpose of enabling or assisting another person to cheat at gambling.*
2. *It is immaterial whether a person who cheats —*
 - (a) *improves their chances of winning anything, or*
 - (b) *wins anything.*
3. *Cheating at gambling may consist of actual or attempted deception or interference in connection with—*
 - (a) *the process by which gambling is conducted, or*
 - (b) *a real or virtual game, race or other event or process to which gambling relates.*

The Company regards cheating (under the UK Gambling Act or otherwise) as an instance of gross misconduct that may result in summary dismissal.

Signed:



Richard Ames, President
SIS Content Services, Inc.

Dated as of: March 1, 2024

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Annex FAQs

Q	What are the rules for betting in the U.S.?
A	You may place a bet in person or online as long as you comply with the law and rules of the U.S. state and operator terms where you are wagering, and the Policy principals. At all times you must avoid the perception of influence or conflict of interest.
Q	If I don't have Direct Influence am not part of a team that includes anyone with Direct Influence, can I place a bet?
A	Because you do not have the ability to directly influence prices, you may place a bet as long as you comply with the Policy principles.
Q	How do I know if an event is covered in a SIS service?
A	Please check with your manager.
Q	Can I hold an account, or place a bet on sports that are not SIS products with customers of SIS?
A	No, this is not permitted under item 4 of the Policy principles. You must avoid the perception of a conflict of interest.
Q	Can I bet if I go to the races with friends / family as a day out?
A	Yes, as long as the race is not included in a SIS service and you are not a person with Direct Influence over the Event or any Event Related Information.
Q	Can I bet on non-SIS products during my work day?
A	Yes, as long as you do not bet with a SIS customer. However, reasonable betting should be limited to times when you are taking a break only.
Q	Can I join an office pool for sporting events, such as the Kentucky Derby, Super Bowl, or other non-SIS event?
A	Yes, because that is a purely internal event which carries no potential risk to SIS's reputation or integrity.
Q	Can I be in a syndicate at work for the lottery?
A	Yes, because the lottery is not a SIS product.
Q	What if I am unsure if I can place a bet or not?
A	Please refer to your manager, do not make a decision yourself and assume it is OK.

SIS Content Services, Inc. www.sis.tv Email: siscsinc@sis.tv			
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Appendix 4 – Esports Job Descriptions

JOB DESCRIPTION

Job Title: Competitive Gamer FC24/NBA2k23

Job Purpose

The Competitive Gamer will play against other players, to the best of their ability, to ensure the successful delivery of esports tournaments at 49CG as part of its Competitive Gaming product. The successful candidate will have knowledge and experience of playing NBA2K21. They will be keen to develop their NBA2K skills, and any other sporting games as required.

Reporting Lines and Key Relationships

The role reports to the Competitive Gaming Operations Manager. The role will work closely with Operations, Referees and Casters on a day to day basis. As such, a high level of interpersonal skills will be very advantageous.

Location: Milton Keynes

Key Responsibilities

Game Knowledge and Practice

- Ensure all games are played to the best of your ability
- Maintain a competitive skill level throughout all games
- Ensuring adherence to Integrity standards, including undertaking training, monitoring and education

Integrity

- Adherence to the event rulebook
- Adherence of ESIC's Procedures and Policies

Professionalism

- Ensure high standards of professionalism on and off broadcast
- Ensure a clean history of social media usage
- Coaching for media and interview usage as required



Skills and Experience

Essential Requirements

- Experience of playing NBA2K23/FC24
- Excellent self-presentation as image will be broadcast
- Desire to compete and win

Desirable Requirements

- Experience in competing at tournaments/offline gaming events
- Knowledge of the video game industry and trends

SIS Values

Inspiring Enthusiasm

- Motivates others to achieve goals, acts as a positive role model for others
- Always displays positive attitudes and behaviours
- Is proud to represent our brand and culture, and promotes our values

Better Together

- Develops and builds effective relationships with customers and colleagues alike
- Provides high quality and timely delivery of duties.
- Strives to support and maintain a harmonious workplace

Focused Innovation

- Identifies new ideas and processes.
- Is committed to continuous personal development.
- Seeks out opportunities to improve own, divisional and team performance

Trusted Delivery

- Ensures that the best interests of SIS are always upheld
- Operates within the legal and regulatory framework.
- Upholds and always promotes the Company's values

This job description is intended to be an indication of the scope of the role. In addition to these functions, employees are required to carry out such other duties as may reasonably be required.

Please note that due to the high volume C.V's received it is not always possible to get back to every applicant.

JOB DESCRIPTION

Job Title: Competitive Gaming Referee

Date of issue: 7 April 2021

Job Purpose

The Competitive Gaming Referee is accountable for the successful delivery of esports tournaments at 49CG as part of its Competitive Gaming product.

The role will require participants to work in line with ESIC regulations, communicate with key stakeholders and support the day-to-day running of the tournaments.

The successful candidate will have excellent attention to detail and data inputting skills. A key element of the role will be the management of gamers and professional oversight of tournament matches so great communication skills are essential.

Experience of organising/running an esports tournament is desirable but not essential.

Reporting Lines and Key Relationships

The role reports to Competitive Gaming Operations Manager. The role will work closely with the Trading, Product and Broadcast functions of the business on a day to day basis. As such a high level of interpersonal skills will be very advantageous.

Location: Milton Keynes

Key Responsibilities

The main responsibilities of the role are:

Player Management

- Guiding and aiding player requests on site when required.
- Ensuring adherence to integrity standards, including undertaking training, monitoring and education as required.
- GDPR Compliance including undertaking training and monitoring.

Production

- Operating the graphics system.
- Directing the live broadcast with manual vision mixing.
- Ensuring accuracy across schedules, graphics, and customer websites.

Tournament

- Ensure the tournament is run in a timely manner and to schedule.
- Provide first-hand technical support where required.
- Creation and updating of supporting documentation, including scores and stats reporting.

Integrity

- Enforcement of competition rulebook and propose changes regularly to the line manager as when necessary.
- Enforcement of applicable integrity rules & processes between gamers.
- Instil & leverage ESIC best practices for event & player integrity.

Skills and Experience

Essential Requirements

- Excellent attention to detail and data inputting skills
- Excellent communication skills
- Demonstrable teamwork skills
- Proficient with MS Office and G Suite
- Excellent self-presentation as image will be broadcast

Desirable Requirements

- Proven and reliable tournament referee
- Proven experience of working with gamers both online and offline
- Expertise in esports tournaments
- Good knowledge of the esports industry and trends
- Knowledge of Betting Industry (both Digital and Retail preferred)

Customer Service

- Provide a best in class level of customer service in terms of delivery and support to both internal and external customers.

Teamwork

- Supporting the Competitive Gaming Operations Manager with scheduling and player handling.
- Lead, motivate and inspire a team across split UK locations.
- Instil a culture of individual accountability and ownership within the team.

SIS Values

Inspiring Enthusiasm

- Motivates others to achieve goals, acts as a positive role model for others
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Better Together

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- Identifies new ideas and processes.
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- Seeks out opportunities to improve own, divisional and team performance

Trusted Delivery

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- Operates within the legal and regulatory framework.
- Upholds and always promotes the Company's values

This job description is intended to be an indication of the scope of the role. In addition to these functions, employees are required to carry out such other duties as may reasonably be required.

ROLE DESCRIPTION

Role Title: Senior Referee

Date of issue: April 2024

Role Purpose

SIS is a leading supplier of betting services to UK and international betting companies, recently we successfully launched an innovative esports betting product. The Senior Referee is responsible for the team members on shift ensuring that all data entries are correct and that all studios are running smoothly and efficiently with minimal disruption.

The role requires proficiency in MS Excel, demonstrable good time keeping and leadership/supervisory skills. The successful candidate must be proficient in performance management as well as have an eye for detail and the motivation to grow and develop their team.

Operating in a fast-paced, challenging environment, this role will demand flexibility and creativity, together with a pragmatic, hands-on approach to delivery. The role would be best suited to someone with previous experience in people management.

Pay & Location

Applicants must be 18 years or over

Job Type: Zero-rated casual/ worker

Pay in the Role: £14.50 per hour + £3.50 per hour Night Shift Bonus

Location: Office-based in Milton Keynes

Shift Pattern: Flexible shift patterns

Key Responsibilities

Gamer/ Studio Supervision

- Ensuring studio and team member integrity
- Supervision of team members while matches are being played to ensure a fair and competitive game
- Leading a team to deliver a punctual live broadcast based on the schedule
- Upholding studio integrity, ensuring ethical gaming practices
- Ensure timely start of shift team briefings
- Assisting the management team in conducting disciplinary procedures

Data Entry

- Ensuring data entry is accurate, timely and up to date
- GDPR Compliance including undertaking training and monitoring

Teamwork

- Supporting the Competitive Gaming Operations Management team with scheduling and Gamer handling
- Communicate with the operations team to deliver the best product possible and report any people issues involving the Gamers/ Referees
- Working with the wider studio supervision/ management team to produce and maintain SOP's

Skills and Experience

Essential Requirements

- Excellent communication and supervisory skills
- Demonstrable leadership skills
- Proficient with G-Suite/MS Office and data entry skills
- Proficient in performance management

About CG (Competitive Gaming) Studios at SIS

49CG started in September 2020 with a small team of 2 Managers, 1 Caster, 1 Referee and 10 gamers with the objective of making the best esports betting product in the world.

- We offer industry leading facilities with a modern kitchen area with free hot drinks vending
- Relax in our break rooms that have sky sports, pool table, and PlayStations
- Free onsite parking
- Clear progression pathways

SIS Values

Inspiring Enthusiasm

- Motivates others to achieve goals, acts as a positive role model for others
- Always displays positive attitudes and behaviours
- Is proud to represent our brand and culture, and promotes our values

Better Together

- Develops and builds effective relationships with customers and colleagues alike
- Provides high quality and timely delivery of duties
- Strives to support and maintain a harmonious workplace

Focused Innovation

- Identifies new ideas and processes
- Is committed to continuous personal development
- Seeks out opportunities to improve own, divisional and team performance

Trusted Delivery

- Ensures that the best interests of SIS are always upheld
- Operates within the legal and regulatory framework
- Upholds and always promotes the Company's values

This role description is intended to be an indication of the scope of the role. In addition to these functions, selected Workers are required to carry out such other duties as may reasonably be required.



Appendix 5 – SIS Recruitment Policy

Recruitment Policy

This Policy covers the following areas for SIS and SIS Group companies:

1. Introduction
2. Process for hiring employed personnel (i.e. those that go on the employee payroll)
 - a. Advertising the role
 - b. Shortlisting
 - c. Interviews
 - d. Offers
3. Checking eligibility to work in the UK
4. Pre-employment checks and pre-employment health screening
5. Process for hiring agency workers/temps/contractors/freelancers/Ltd company – i.e. off-payroll appointments

For information about recruitment where the role-holder will be based outside of the UK, please also refer to the International Recruitment Policy found at page 9 onwards.

1. Introduction

It is SIS company policy that hiring managers are responsible for recruitment in conjunction with the Human Resources department. A manager who wishes to recruit for a position must first follow the vacancy request process within SelectHR. A video explaining how to do this is available on the SelectHR system, or the Talent Acquisition Adviser (TAA) can show you how to do this. A vacancy request must be raised for all vacancies, both on-payroll posts (such as permanent/fixed term employees and casual workers) and off-payroll posts (such as temps/contract/freelance/Ltd company appointments), and for any extensions/amendments to a previous request. This includes any short-term arrangements for a contractor, irrespective of whether it's a directly sourced candidate, via an agency or a casual (including those previously described as a freelancer and paid via purchase ledger).

Before embarking on the process of recruitment for an employed post, the hiring manager must ensure that there is an up-to-date job description for the post (in the correct template) including a clearly drafted employee specification. The job description will describe the duties, responsibilities and level of seniority associated with the post, whilst the employee specification will describe the type of qualifications, training, knowledge, experience, skills, aptitudes and competencies required for effective performance of the job. Your HR Business Partner or the TAA can help you with this. When recruiting for an off-payroll role an outline of the services to be provided must be provided in a role specification document.

Once the position has been approved, the TAA will contact you to arrange a campaign planning meeting. At this meeting, recruitment and assessment methods will be discussed. We encourage direct applications in the first instance and have a number of job boards at our disposal. However, we do have a PSL in place for recruitment agencies, and these should be used before approaching any other agencies. Should you have a preferred agency you would like to work with who is not on the PSL, please make the TAA aware so they can use their services should the role not be filled. Terms must be agreed, which should generally be no more than 15%. Recruitment Agency terms

must only be signed by designated signatories as per the Company delegated authorities which can be found in the finance section of SIS Central. The hiring manager should check their budget with their management accountant regarding the budget available for the recruitment campaign. Where the hiring manager is not a budget holder they should check with the budget holder.

2. Process for hiring employed personnel

The process below relates to recruitment of an employed/on-payroll role. For the process relating to off-payroll/contractor/Ltd Company appointments please see section 5 below.

a. Advertising the role

All SIS vacancies will be advertised on the intranet and (if advertising externally) on the SIS website, unless there are extenuating circumstances – see below*.

Typically, roles will be advertised internally for two weeks before any external methods are introduced, but this is at the hiring manager's discretion. Roles may be advertised externally concurrently if it is felt that there are no suitable internal candidates, and to speed up the process.

Internal Applicants

Existing employees are to be encouraged to apply for vacant posts if they have the appropriate qualifications, experience and skills. Generally, an individual must have successfully completed their probationary period in their current role before they can apply for another job within SIS.

Whilst the hiring manager will be encouraged to interview all internal applicants, it is at their discretion if they do not wish to proceed with a candidate, although relevant feedback must be provided to all internal candidates. All shortlisting decisions need to be evidenced and based on skills and experience to do the job.

*There may be occasions when SIS may make a role available only to a closed pool of internal employees in the first instance – such as when individuals are, or would otherwise be, facing redundancy and the role is deemed to be potential alternative employment.

External methods

External methods can include any of the following:

- **Employee Recommendations:** SIS has in place an employee referral scheme where any successful recommendations will result in the employee being paid a referral fee. All hiring managers should make their team aware of this and encourage employees to refer candidates where possible. Please see the Recruitment Referral policy for further information.

- **Previous Applicants:** Hiring managers should consider any applicants that have either applied or been interviewed in the past who may be suitable. It is recommended that hiring managers advise the TAA of all applicants who may be of interest in the future, in order that they may be saved in the relevant talent pool.
- **Recruitment Agency:** A position may be advertised with an external recruitment agency. Fees and terms must be agreed by the TAA and Procurement prior to proceeding with this. Agencies currently on our PSL already have terms agreed so may be used without further formalities.
- **External Advert:** This could be in the form of a generalist or specialist job board, University careers site etc. Should there be a cost associated, this cost needs to be authorised and borne by the hiring manager.
- **Social Media:** Roles can be advertised via SIS LinkedIn and Twitter pages. The TAA may also have a LinkedIn Recruiter licence to carry out searches/approaches – this can be discussed at the outset.
- **Student Placement:** Hiring managers may consider this as an option to their recruitment solution. Please see the Student Placement policy for further information.

Job adverts

Job advertisements include emails and in-company notices, as well as advertising on the internet. Job adverts will follow the SIS branding/format and should normally be written by the TAA and the hiring manager, or in their absence another member of the HR team. An advert should not be posted (e.g. on social media) unless it has been screened by HR.

No job advertisement should discriminate on the basis of any of the protected grounds, unless there is objective evidence that the discrimination is lawful.

For guidance on job adverts please visit:

<http://www.acas.org.uk/index.aspx?articleid=4657>

www.equalityhumanrights.com

All roles will be advertised via the Applicant Tracking System (ATS), and all applications will be received via the ATS. Hiring Managers will be given a log in and password in order to see the applications that are received, and the TAA will provide training on the system. Hiring Managers may reject candidates via the ATS, or request that the TAA do this for them – whoever rejects them will have their contact details on the email to the candidate, so Hiring Managers may prefer that the TAA do this.

b. Shortlisting

Hiring Managers should shortlist all applicants using the job description and person specification. This must be as objective as possible, rather than based on intuition. If any doubt exists over a candidate's experience, further clarification should be sought from them.

Hiring Managers may update the status of candidates within the ATS, but HR do not get an automatic notification of this, so Hiring Managers should notify the TAA of whom they wish to progress to the next stage.

c. Interviews

SIS normally adopts a 2-stage interview process.

The first interview will be conducted by the hiring manager and possibly one or more of their colleagues. The interview will focus on the needs of the job and skills/experience required to perform effectively. Whilst this will normally be done face to face, it may be done over Microsoft Teams if appropriate.

2nd Interviews will be competency-based and will be conducted by the hiring manager and the Talent Acquisition Adviser (TAA). Should the TAA not be available, another member of the HR team may assist. If speed is of the essence, both stages can be combined. In certain situations, if a member of HR is unavailable, and the hiring manager is a competent and confident interviewer, interviews may take place with the hiring manager and another colleague – please check with the TAA. Second stage interviews should ideally take place face to face, but could also be conducted via Microsoft Teams if necessary.

Should the hiring manager wish to offer the individual the position after the initial interview, this must be discussed with the TAA.

d. Offers

It will be agreed at the end of the interview process who shall put the offer to the candidate. For internal candidates, it will typically come from the hiring manager via telephone/face to face. For external/agency/contractor candidates, it will typically come from the TAA.

The offer is normally made verbally by telephone and then followed up in writing by HR.

Candidate Feedback

All unsuccessful candidates, at either shortlisting or interview stage, will be notified, with feedback, in writing by the TAA. The hiring manager may prefer to speak personally with unsuccessful internal candidates.

Should the unsuccessful candidate come via a recruitment agency, the TAA will inform the agency and provide feedback.

Additional Information

When recruiting for a vacancy, the process and questions must be the same for all candidates. This ensures consistency, fairness and the ability to compare candidates objectively.

The TAA/hiring manager will ensure that the questions asked to the applicants are relevant and not in any way discriminatory or unnecessarily intrusive.

A selection of interview questions relating to each of the SIS values are available from HR. The chosen questions, together with any technical/role-specific questions, will be placed in the interview template by the TAA.

Interview notes must be scanned and sent to the TAA for retention on the recruitment file. These will be retained for 6 months, then deleted.

We are obliged to make reasonable adjustments at interview for candidates with a mental or physical impairment as defined in the Equality Act. Invitations to interview ask candidates to advise us if they need us to make any adjustments.

3. Checking eligibility to work in the UK

SIS has a legal duty to check that successful candidates have the right to work in the UK* before they commence employment. This means that the job offer will be conditional on the candidate having the right to work in the UK*.

More detailed information about checking eligibility to work in the UK can be obtained from <https://www.gov.uk/check-job-applicant-right-to-work>

Candidates are requested to bring this information with them to the interview stage and HR will arrange for copies to be made. If no member of HR is attending the interview, the hiring manager is responsible for taking a copy. If candidates forget to bring in the required documentation, they must bring it in at some point between the time the offer is made and their start date.

In certain situations, such as a pandemic, the government eases requirements so that we may accept a copy and the original may be inspected via a video call with the candidate.

To determine whether or not a candidate has the right to work in the UK*, SIS will:

- ask the applicant to produce original documents showing that he or she has the right to work in the UK*;
- check that the documents relate to the job applicant; and
- keep a copy of the documents.

SIS will request the same documents from all applicants and not just from those whom they think may not have the right to work in the UK*.

A Right to Work checklist must also be completed for all UK/Irish citizens and saved on their file. HR will send you the current checklist at the appropriate time.

This should be completed by someone who saw both the original documents, and the candidate themselves, in order to confirm that they genuinely belong to that candidate.

Since the UK left the European Union, anybody wishing to work in the UK, excluding UK and Irish citizens, must apply for permission in advance via the UK points-based immigration system.

This means that only UK and Irish citizens, EU citizens with Settled or Pre-settled Status, or non-EU citizens with indefinite leave to remain, will automatically have the right to work in the UK. All other candidates (EU and non-EU citizens) require sponsorship by the employing organisation, and certain criteria must be met in relation to skill level, salary and competence in the English language.

Candidates need a minimum of 70 points to be eligible, and visas will be awarded by the government to those who gain enough points to enable them to work in the UK.

For candidates who are EU, EEA or Swiss Citizens (i.e. not UK or Irish citizens) and were living in the UK prior to 1st January 2021, they must have applied for Settled Status in order to remain living and working in the UK. They will be granted Settled Status if they have lived in the UK for 5 years or more, and granted Pre-Settled Status if they have lived in the UK for less than 5 years. In both cases they will be able to give you a Share Code – this enables an online check to be done to verify that they have the right to work. Please contact HR for assistance in this situation.

Please speak to your HR Business Partner/Talent Acquisition Advisor if you need any advice. Further information can be found here:

<https://www.gov.uk/government/publications/uk-points-based-immigration-system-employer-information/the-uks-points-based-immigration-system-an-introduction-for-employers>

Candidates are not permitted to commence employment or start work until their right to work documents have been checked.

* Where the jobholder will be based in Ireland or another country, arrangements must be made to ensure the right to work checks relevant to the law of that country are followed.

4. Pre-Employment checks

Offers of employment are subject to receipt of two satisfactory written references, confirmation of fitness to work from our Occupational Health team, and proof of eligibility to work in the UK (or any other country in which the employee will be based).

Reference Checks

The decision made by SIS is final as to whether the references meet our requirements. References will be taken up when the candidate confirms acceptance of our conditional offer of employment, unless they consented to us doing so earlier. These will usually be from their last two employers.

References will normally be taken up directly with the company, through the referee's company email address. It will not ordinarily be acceptable to take up references via a referee's personal address (e.g. gmail, Hotmail, yahoo).

If there is any delay in our obtaining the references, and if their employment has already commenced before we receive them, it is understood that their employment may be terminated in the event of such references falling short of our requirements. Every effort will be made to obtain references as quickly as possible and before employment commences. If references are not received by the end of the probationary period, the Company reserves the right to not confirm the employment.

For new employees in the Finance department, all employment references must be received, and be deemed satisfactory by SIS, before their start date.

Pre Employment Health Screening

Following an offer of employment candidates will be asked to complete a pre-employment health questionnaire from our Occupational Health team, in order to ascertain fitness to work.

This must be received prior to their start date, as the report may advise that certain adjustments must be made to the work environment to accommodate some disability/impairment/illness. If the adjustment is deemed to be reasonable, SIS is legally obliged to make that adjustment.

5. Agency Workers Policy (including contractors/freelancers/Ltd company appointments)

A temporary work agency (TWA) supplies agency workers to work temporarily for a third party (the hirer e.g. SIS). The agency worker works temporarily under the supervision and direction of the hirer but only has a contract (an employment contract or a contract to perform work or services personally) with the TWA. A TWA could be a recruitment agency, but could also be an intermediary such as an umbrella company or a master or neutral vendor if they are involved in the supply of the agency worker.

When agency workers/contractors/casuals/freelancers will be used

SIS will use temporary agency workers only to provide additional resources or to access a specialised skillset and allow for flexibility on a short-term basis from time to time.

SIS will hire temporary agency workers from carefully selected agencies to assist in relation to:

- occasional work, such as one-off projects;
- sudden increases in demand for products/services;

- the absence of employees, for example due to holiday or sickness;
- When a specialised skillset is required.

On 6th April 2021, off-payroll working rules changed, and SIS is responsible for determining the employment status of workers. These rules are commonly referred to as IR35. The off-payroll working rules (IR35) apply if a worker provides their services through an intermediary (e.g. agency), but would be classed as an employee if they were contracted directly. The IR35 rules ensure that workers providing services through an intermediary pay broadly the same tax and National Insurance contributions as an employee. If this status determination is incorrect, the liability for unpaid taxes and NI falls upon SIS.

To determine whether a relationship between the individual worker and the end user gives rise to deemed employment for tax purposes, and hence whether a contractor falls within the IR35 guidelines, there are tools to assist you:

<https://www.gov.uk/guidance/check-employment-status-for-tax>

[IR35 Contractor Engagement Form \(Manager\)](#)

[IR35 Analysis Tool](#)

You must talk to your HR Business Partner if you believe you are likely to engage an individual in this manner, to ensure the correct status determination is reached and the appropriate contracting and payment model applied.

If the CEST determination comes back as “Unable to determine” please check the details for a second time in case of errors and if there is no change, you will have to let the HRBP know, who will then escalate to the HR Director.

A manager who wishes to recruit an agency worker must receive authorisation by following the vacancy request process within SelectHR. A new vacancy request will be required if the original assignment requires an extension, if the fees change, or the requirements of the role change.

The written request for additional resources must set out the:

- agency worker's intended start date;
- approximate length of the assignment;
- reason why additional resources are required;
- why an employee could not fulfil this request;
- appropriate rate of pay (based on current market conditions, and including the agency's fees);
- job description/specification of services to be provided;
- names of any preferred individual, if a choice of workers is offered by the agency, and why that individual was chosen; and
- whether the activity is budgeted for.

Agency workers/contractors may be hired only from a list of approved agencies where terms have been agreed by HR. This list is available from the TAA should you wish to view. Should you wish to recruit from an agency outside of the approved list, terms must be agreed in advance. Please speak to the TAA for further clarification. If you want to advertise for casuals (eg on social media) please speak to the TAA regarding an appropriate recruitment campaign.

Anybody engaged as a contractor or freelancer must be registered as a Limited company (or through an umbrella company) as we are unable to pay sole traders.

Agency worker rights

Agency workers are entitled to a number of rights from day 1 which significantly increase from week 12 when they are entitled to the same basic terms and conditions as if you had been recruited directly. For more information see the attached link:

<https://www.gov.uk/agency-workers-your-rights/your-rights-as-a-temporary-agency-worker>

Interviews

The hiring manager, and one of their colleagues, will be required to meet with the candidate (or interview via Teams if necessary) in a one stage interview process. The aim will be to try and ascertain whether the individual is able to perform the role and will be largely based on the technical aspects of the role.

For external/agency/contractor candidates, offers will typically be made by the TAA.

International Recruitment Policy

This policy covers SIS Ltd, SIS Media Ltd, SIS Content Services Inc, 49CG and 49s.

The policy applies when recruiting someone whose work base will be outside of the UK and should be read in conjunction with the general Recruitment Policy, as many of the steps are the same, such as sections 1 & 2 (Introduction, how to request the vacancy, tips on where to advertise and how to interview).

Please be aware of international time differences when arranging interviews. You may be required to hold interviews and undertake recruitment activities outside of your normal working day (e.g. in the evening). In these circumstances arrangements may be made to adjust your start and finish times accordingly on that day or take the time back in lieu.

This policy does not apply when recruiting someone internationally to work in the UK. In these circumstances you should speak to the Talent Acquisition Advisor or your HR Business Partner about the eligibility requirements to work in the UK and the process of UK VISA sponsorship.

It does not apply when recruiting someone who is based in Ireland, although we may need to contract the individual through SIS Media in order to pay them in Euros.

If you are considering recruiting for an international role via an international assignment arrangement for a current UK-based employee, it is important that you speak to a member of the HR team at the earliest opportunity.

Predominantly, the differences will occur in how we engage with the individual i.e. whether we employ them directly or via a contract for services. Factors which influence this include the type of role, the individual's nationality, and the basis of their right to live and/or work in the location - i.e. the different pre-employment checks we will need to conduct, and any local legislation. These all vary based on location.

Despite what you may read or hear via the media, this is not a simple process. There are many factors which can influence this and the potential penalties for employer and/or individual can be severe, so naturally we want to avoid incurring any of these.

For SIS Content Services Inc., please also see Appendix 1 for any other considerations in addition to those below.

For roles in SIS, SIS Media, 49CG and 49s, particularly in Commercial/Sales/Product teams where the majority of the team is based in the UK/Ireland, but the new role is based overseas, the general Recruitment Policy applies, but with the following differences:

The role will be contracted through SIS Media, rather than SIS Ltd, as the employment legislation is different and it enables us to pay people in their local currency (usually Euros).

Prior to raising a vacancy request, ideally we need to understand the relevant employment legislation and the business taxation requirements in whichever country the role will be based, so you should liaise with your HR Business Partner (or via hr@sis.tv) first. This can be a time-consuming stage in the process as advice must be sought from external specialists.

You should also speak to your management accountant about how recruitment costs incurred in different currencies and/or countries should be reflected in your budget.

Once we have established and understood any commercial or corporate taxation implications, HR will then be able to advise whether the new colleague will be an employee or a contractor, and establish if we have, or require documentation for that location to be drafted by securing an employment lawyer.

If we are able to engage the individual as a contractor, and that is appropriate for all parties, we will make appropriate arrangements.

For the small numbers of our colleagues based outside the UK, if it's relevant and possible to cover local pension and healthcare costs on an individual basis, that is what we have to do. It is unlikely that we will take on sufficient numbers of workers to make any group policies economically viable outside of the UK, however we continue to explore options. Please contact hr@sis.tv to check what the offer will include.

Checking eligibility to work in the relevant country

We have a legal duty to check that successful candidates have the right to work in the country in which they are based before they commence employment. This means that the job offer will be conditional on the candidate having the right to work in the relevant country.

Candidates are requested to provide this information at the offer stage, and it is likely to be a scan/copy of an original passport and/or work visa.

Some individuals' right to work is as a consequence of a spousal visa, rather than their own personal visa. We must therefore ensure that we have the details of all relevant documentation i.e. name, duration and type of activity permitted, including if it is role- or employer-specific.

If we engage an individual as an employee, any offer of employment is also subject to receipt of two satisfactory written references (not required if we engage them as a contractor).

See the general Recruitment Policy for information regarding references.

If there is any delay in our obtaining the references, and if their employment has already commenced before we receive them, it is understood that their employment may be terminated in the event of such references falling short of our requirements. Every effort will be made to obtain references as quickly as possible and before employment commences. If references are not received by the end of the probationary period, the Company reserves the right to not confirm the employment.

Appendix 1

SIS Content Services Inc.

Recruitment in the USA may differ depending on the state in which the person is located. Please liaise with your HR Business Partner (or hr@sis.tv) before commencing any recruitment so they can investigate the employment legislation in the relevant state(s).

We currently have a registered office in Delaware:

Corporate Trust Center
1209 Orange Street
Wilmington
Delaware 19801
USA

And an office based in Kentucky:

2616 Bardstown Road
FL3
Louisville
Kentucky 40205

Arrangements will be made to cover local pension and healthcare costs on an individual basis.

It is unlikely we will take on sufficient numbers of workers to make any group policies economically viable, however we continue to explore options.

Updated April 2024

This policy does not form part of your employment contract. The company may amend policies on prior notice from time to time.

Appendix 6 – Ebasketball

About Ebasketball

Each ebasketball game is played with two players facing each other on two separate screens, two controllers and one console. Each match is played with 5-minute quarters (totaling 20 minutes). If the game finishes as a draw within regulation time, it then goes to overtime with an additional 3 minutes played, repeating until there is a clear winner. There is no limit to the amount of overtime as there must be a clear winner at the end of the game.



Ebasketball Team Selection

There are 8 teams in rotation, each day a Gamer will be randomly assigned to one team from each group and will play 10 or 11 games a shift. The players are sorted by ELO score to assign them to the corresponding Stream. The players are randomly matched with other players of equal skill and are assigned to teams and Streams for the day. Players switch teams midway through each shift to provide variety in play.

Group 1	Group 2
Cleveland Cavaliers	Milwaukee Bucks
Golden State Warriors	Boston Celtics
Dallas Mavericks	Los Angeles Lakers
Phoenix Suns	Memphis Grizzlies



Ebasketball Ruleset and Settings

Configuration

- **Mode:** Play Now
- **Player Selection:** All
- **Banned Players** Yes
- **Rounds:** 1
- **Camera:** 2K Camera

Game Setting

- **Display Mode:** Light
- **Game Difficulty:** Superstar(custom)
- **Quarter Length:** 5 minutes
- **Fatigue:** Off
- **Injuries:** Off
- **Game speed:** 50 (Default)
- **Foul Out:** 6
- **Shot Feedback:** Off
- **Shot Meter Color:** Red
- **Camera Shake:** Off
- **Fatigue Meter Color:** Team Color
- **Action Replays:** Never
- **After Basket Camera Cuts:** Never
- **Ball Handler Text:** Name
- **Read and React Indicator:** Off
- **Pick and Roll Overlay:** Off
- **Units of Measurement:** Imperial
- **Favorite Team:** None
- **Audio Presentation:** Custom (set to 60)

CPU & User Sliders

Load custom profile using Triangle

- Superstar
- Layup Success (Offence) 54 → 55
- Foul Sliders frequency reduced by 10
 - Over the Back, Charging, Blocking, Shooting & Illegal Screen: 50 → 40
 - Loose Ball: 60 → 50
 - Reaching: 70 → 60



Coach Settings

- **Adaptive Coaching Engine:** Offense and Defense
- **Timeout:** Manual
- **Player Minutes:** Manual
- **Substitution:** Manual
- **Sub Method:** Rotation
- **Offense Play Vision:** Off
- **Play Vision Display:** Lite
- **Play Calling Messages:** Off
- **Offense & Defense Play Calling:** Manual
- **Late-game Fouling:** Manual
- **Team Communication:** Off
- **Freelance Series Order:** Static
- **Freelance Series Repeat:** Repeat on Success
- **Adaptive Coaching:** Off

Controller Settings

This **must** be checked on both controllers, as the player 2 controller does not save the settings once switched off. The underlined settings are the primary ones that need to be changed

- **Speaker:** Off
- **Vibration:** On
- **Shot Meter:** On
- **Shot Timing:** Shots and Layups
- **Perfect Release:** Flame
- **Perfect Release SFX:** Catch Fire
- **Player Indicator:** Circle
- **Player Indicator Color:** Red
- **Free Throw Timing:** User Timing
- **Pro stick Function:** Default
- **Pro stick Orientation:** Absolute
- **Icon Passing:** Default
- **Receiver Control:** Handoff/Pitch Pass
- **Pro Stick Defense:** Absolute
- **Who to Guard:** On
- **Defensive Assist with Intense-D:** 0
- **Boxout Assist Strength:** 50
- **Pass Target Profile:** Default
- **Pass Target Direction:** 44
- **Pass Target Distance:** 50
- **Pass Target Openness:** 6

Jersey Selection

- **Roster:** Custom InjuryFree2 Roster
- **Teams:** Current ebasketball Team (*Team LeBron & Team Stephen Banned*)
- **Jerseys (Kit):** Player Right: WHITE (Home) Kit
Player Left: Default non-white Kit.
Players are not allowed to choose their own colors.



Appendix 7 – Esoccer

About Esoccer

Esoccer games are played with two players facing each other with two separate screens, two controllers and one console. Each game is played at 4-minute halves (8 minutes total per game) and while on broadcast they are built into 15-minute gaming windows.

Esoccer Team Selection

For the current team selection there are 4 groups, and each player will play on one team from each group which is randomly assigned daily. The current esoccer groups and teams are as follows:

Group 1	Group 2	Group 3	Group 4
Manchester City	England	Tottenham	Atletico Madrid
Real Madrid	Portugal	Newcastle	Barcelona
Bayern Munich	Spain	Aston Villa	Inter Milan
PSG	France	Arsenal	Liverpool

Esoccer Ruleset and Settings

Game Mode

- Kick off; Classic

Match

- **Half Length:** 4 minutes
- **Difficulty Level:** Professional
- **Competitor Mode:** On
- **Player Based Difficulty:** Off
- **Attributes:** Default
- **Game Speed:** Fast
- **Ball:** Default
- **Quick Subs:** Hidden

Camera

- **All to Coop**
- **Camera Settings to Default**
- **Attributes to 10 (Unchanged)**



Visual

- Hud:** Indicator
- Player Indicator:** Player Name
- Player Indicator Size:** Default
- Player Indicator Fade:** On
- Player Indicator Difficulty Indicator:** On
- Hold to Skip:** On
- Time/Score Display:** On
- Radar:** 2D
- User Radar Color:** Default
- Opponent Radar Color:** Default
- Online ID Indicator:** Fade
- Score Clock Dropdown:** On
- Net Tension/Shape/Meshing:** Default
- Scrolling Line Ups:** On
- Connection Monitoring:** Connection Indicators Only
- Input Overlay:** Off
- Player Performance Widget: Player Indicator:** On

Rules

- Injuries:** Off
- Offsides:** On
- Bookings:** On
- Handball:** Off

Audio

- Volumes to 10
- All settings off
- Match Conditions:** Summer 1pm
- Weather:** Clear
- Fatigue:** Off
- Esoccer Trainer:** Off
- All assists:** On
- All other settings at default
- Draw if not clear winner after 90 min



Sample ebasketball daily schedule:

NBA STREAM 2					
Date	Start Time (GMT)	Player 1 Name	Player 1 Team	Player 2 Name	Player 2 Team
25/03/2022	07:12	FK	Boston Celtics	TD24	Los Angeles Clippers
25/03/2022	07:45	JABZ	Phoenix Suns	BP	Golden State Warriors
25/03/2022	08:18	FK	Boston Celtics	JABZ	Phoenix Suns
25/03/2022	08:51	TD24	Los Angeles Clippers	BP	Golden State Warriors
25/03/2022	09:24	FK	Boston Celtics	BP	Golden State Warriors
25/03/2022	09:57	TD24	Los Angeles Clippers	JABZ	Phoenix Suns
25/03/2022	10:30	TD24	Los Angeles Clippers	FK	Boston Celtics
25/03/2022	11:03	BP	Golden State Warriors	JABZ	Phoenix Suns
25/03/2022	11:36	JABZ	Phoenix Suns	FK	Boston Celtics
25/03/2022	12:09	BP	Golden State Warriors	TD24	Los Angeles Clippers
25/03/2022	12:42	BP	Golden State Warriors	FK	Boston Celtics
25/03/2022	13:15	FK	Philadelphia 76ers	JABZ	Milwaukee Bucks
25/03/2022	13:48	TD24	Los Angeles Lakers	BP	Brooklyn Nets
25/03/2022	14:21	FK	Philadelphia 76ers	BP	Brooklyn Nets
25/03/2022	14:54	TD24	Los Angeles Lakers	JABZ	Milwaukee Bucks
25/03/2022	15:27	TD24	Los Angeles Lakers	FK	Philadelphia 76ers
25/03/2022	16:00	JABZ	Milwaukee Bucks	FK	Philadelphia 76ers
25/03/2022	16:33	BP	Brooklyn Nets	FK	Philadelphia 76ers
25/03/2022	17:06	BP	Brooklyn Nets	TD24	Los Angeles Lakers
25/03/2022	17:39	JABZ	Milwaukee Bucks	TD24	Los Angeles Lakers
25/03/2022	18:12	BP	Brooklyn Nets	JABZ	Milwaukee Bucks
25/03/2022	18:45	EL IDOLO	Boston Celtics	EZA	Los Angeles Clippers
25/03/2022	19:18	HEZI	Phoenix Suns	ISSE	Golden State Warriors
25/03/2022	20:18	EL IDOLO	Boston Celtics	HEZI	Phoenix Suns
25/03/2022	20:51	EZA	Los Angeles Clippers	ISSE	Golden State Warriors
25/03/2022	21:24	EL IDOLO	Boston Celtics	ISSE	Golden State Warriors
25/03/2022	21:57	EZA	Los Angeles Clippers	HEZI	Phoenix Suns
25/03/2022	22:30	EZA	Los Angeles Clippers	EL IDOLO	Boston Celtics
25/03/2022	23:03	ISSE	Golden State Warriors	HEZI	Phoenix Suns
25/03/2022	23:36	HEZI	Phoenix Suns	EL IDOLO	Boston Celtics
26/03/2022	00:09	ISSE	Golden State Warriors	EZA	Los Angeles Clippers
26/03/2022	00:42	ISSE	Golden State Warriors	EL IDOLO	Boston Celtics
26/03/2022	01:15	EL IDOLO	Philadelphia 76ers	HEZI	Milwaukee Bucks
26/03/2022	01:48	EZA	Los Angeles Lakers	ISSE	Brooklyn Nets
26/03/2022	02:21	EL IDOLO	Philadelphia 76ers	ISSE	Brooklyn Nets
26/03/2022	02:54	EZA	Los Angeles Lakers	HEZI	Milwaukee Bucks
26/03/2022	03:27	EZA	Los Angeles Lakers	EL IDOLO	Philadelphia 76ers
26/03/2022	04:00	HEZI	Milwaukee Bucks	EL IDOLO	Philadelphia 76ers
26/03/2022	04:33	ISSE	Brooklyn Nets	EL IDOLO	Philadelphia 76ers
26/03/2022	05:06	ISSE	Brooklyn Nets	EZA	Los Angeles Lakers
26/03/2022	05:39	HEZI	Milwaukee Bucks	EZA	Los Angeles Lakers
26/03/2022	06:12	ISSE	Brooklyn Nets	HEZI	Milwaukee Bucks



VERSION HISTORY

Version	Date	Author	Notes
1.0	05/01/2022	SIS Content Services, Inc.	Initial version; appr. per SIS Group procedures.
1.1	09/01/2022	B. Strickland	Add ref. to H2H GG League; results website; appr. by product and commercial.
1.2	11/01/2023	B. Strickland	Updates to game information.
1.2	01/00/2024	K. Mendelsohn	Updates to SIS Betting at Work and Responsible Gambling Policy.
1.3	03/01/2024	B. Strickland	Updates to clarify internal game production processes; player incentives; addition of U.S. Betting at Work and Responsible Gambling Policy.
1.4	10/01/2024	B. Strickland	Updates to game operation (remove casters); update group policies and job descriptions; add security provisions.
		K. Mendelsohn	General review of updates; compliance review.
1.5	11/07/2024	C. Thornton	Review of technical and updates to reflect current practice
1.6	01/00/2025	B. Strickland; K. Mendelsohn	Compliance and regulatory updates



***GLOBAL GAMING
LEAGUE***

**OVERVIEW
FOR REGULATORS**

BUSINESS OVERVIEW

H2H Global Gaming League™ (H2HGGL), the league operated by the Sports Information Services/SIS Group (collectively "SIS"), distributes its popular competitive gaming esports titles and tournaments to a network of international operators. Operating in the U.S through SIS Content Services, Inc., the group's esports offering is supplied to licensed sportsbooks.

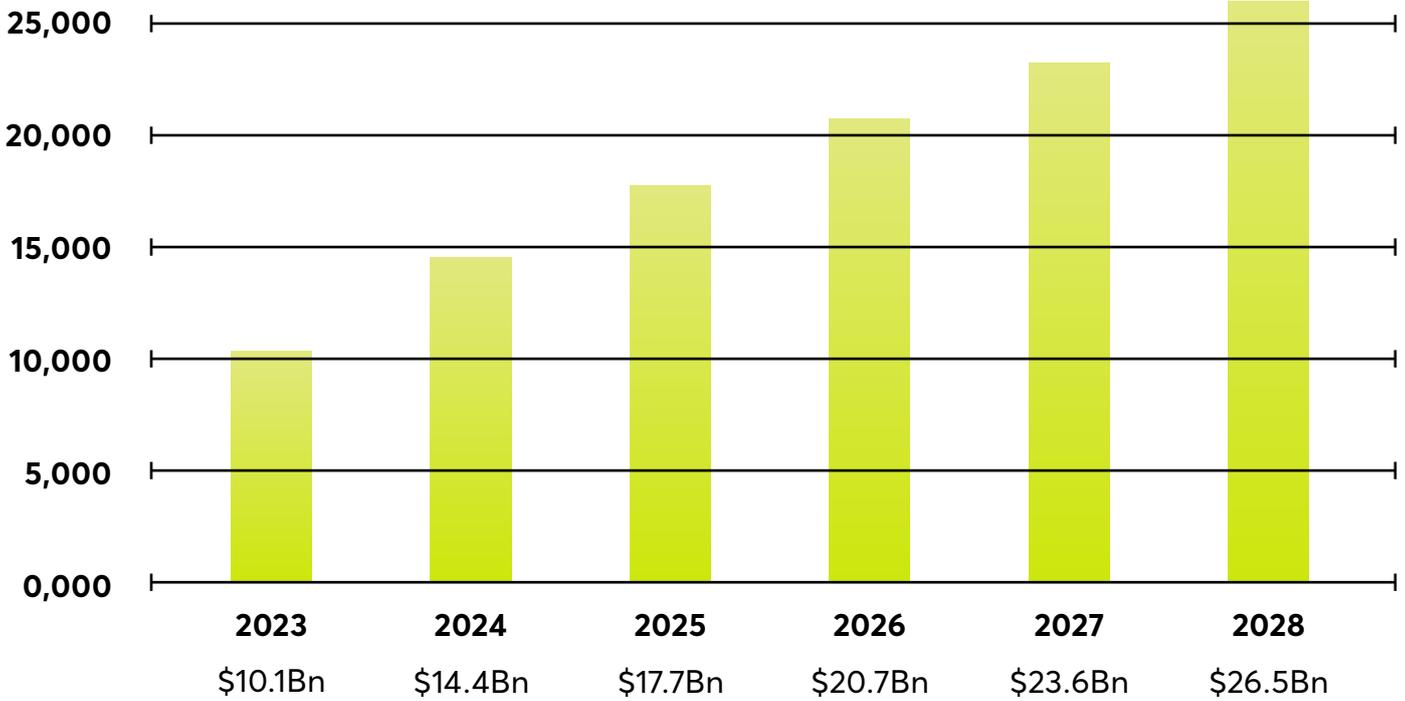
SIS hosts daily esports matches from the United Kingdom at its studio in Milton Keynes known as the SIS Esports Factory. The structure allows SIS to have direct oversight of every aspect of the operation and competitions from employing professional gamer athletes (all over the age of 18), referees, casters (commentators) to game regulations to the equipment and facilities.

SIS Content Services, Inc. is part of the Sports Information Services/SIS Group that was formed in the United Kingdom in 1985 by the UK's four largest licensed sportsbook operators at that time. SIS Content Services, holds licenses in various U.S. states to provide wagering content to licensed entities.



**SINCE 2020 OVER
\$3.4 BILLION USD
HAS BEEN BET ON
H2HGGL CONTENT
GLOBALLY**

Market research and analysis shows the potential of the esports in-play betting category, as follows:



In 2018, SIS identified the market demand for fast-paced 24/7 esports betting content.

The pandemic propelled this category into the mainstream as operators hunted for content to replace cancelled sporting events.

Fast forward to today, with sporting events back in full swing, it's clear that this isn't just filler content. It has transformed into content that end users consider an essential part of the typical content catalog on a sportsbook.

As more and more sports **bettors** discover the exciting betting opportunities available, SIS predicts turnover in this category to grow exponentially by **160% over the next 5+ years to over \$26bn.**

H2H GGL presents the premium choice with integrity, stable margin, and competitiveness at the forefront of the offering combined with market-leading operations, trading and analytics teams and processes in place to enable scaling to meet demand without faltering on the core values of the product.

WHO IS ESIC?



The esports Integrity Commission (ESIC) plays a crucial role in protecting the integrity of esports for sportsbook operators. As a not-for-profit members' association, ESIC collaborates with sportsbook operators to ensure a safe and trustworthy environment for esports betting.

ESIC enforces fair process and implements standardized codes & regulations, which serve as benchmarks for content providers. By sharing information and intelligence, ESIC strengthens the fight against cheating and corruption in esports, thus safeguarding the interests of sportsbook operators. Confidentiality is maintained to prevent reputational damage until individuals are found guilty, ensuring a reliable and secure platform for esports sportsbook.



Gold Standard

SIS was awarded the esports Integrity Commission's (ESIC) Gold Standard certification. The Gold Standard is the highest possible accreditation from ESIC, and SIS is the first esports betting events supplier to meet the stringent certification criteria.



Importance of Integrity.

At SIS, we recognize that the integrity of betting events is of utmost importance to regulatory authorities and sportsbook operators alike for several reasons: legitimacy, longevity, and profitability.



Legitimacy

Maintaining integrity is crucial for the legitimacy of sportsbook operators in the eyes of regulatory bodies, government authorities, and the public in many jurisdictions. Operators are required to adhere to strict rules and regulations to maintain their licenses. By ensuring the integrity of betting events, operators demonstrate their commitment to fair play, responsible sportsbook practices, and compliance with regulatory requirements. This helps them establish legitimacy, gain the trust of authorities, and operate in a legally compliant manner.



Longevity

Maintaining the integrity of betting events is crucial for the long-term sustainability of sportsbook operators and gaming products. If customers perceive that the outcomes of betting events are manipulated or unfair, they will lose trust in the operator. This loss of trust can result in a decline in customer participation and engagement, ultimately leading to a decrease in revenue. By upholding integrity, operators can build a strong reputation, retain customers, and ensure the long-term viability of their operations.



Profitability

The profitability of sportsbook operators is directly linked to the integrity of betting events. When customers have confidence in the fairness and transparency of the outcomes, they are more likely to engage with the offering. Trust in the system encourages customers to wager larger amounts and bet more frequently, this combined with monitoring for match fixing increases the overall revenue. Additionally, integrity also attracts new customers who are looking for a secure and reliable sportsbook experience, further contributing to the profitability of the operator and increasing taxable revenue.

HOW SIS MAINTAINS THE HIGHEST STANDARDS



SIS integrity Policy

- Integrity and Respect: Each player must have respect for the officials, opponents, and rules.
- Fair Process: Adopted procedures will be balanced, proportionate, and fair to all parties.
- Implementation, Education, and Enforcement in Standardized Codes: SIS is dedicated to educating players and staff about SIS policies.
- Confidentiality: Issues of integrity will only be shared with those on a need-to-know basis.



Operating Facility Security Policies

- Office Security
- Security Desk Guard
- CCTV
- ID Badges
- Stream recordings
- Approved schedules

Staff Policy



Communication Devices

- All communication devices are strictly prohibited and logged on-site, kept in a phone safe during live broadcasts.
- Permission from the shift ops manager is required to retrieve a mobile device.
- Any player found with a device without permission is subject to a disciplinary process up to and including dismissal.

Staff Policy



Shift Manager Visibility & Responsibilities

- Shift managers provide 24-hour monitoring of the streams going out to operators and of the team(s) in the studios
- Shift managers do spot checks to ensure all integrity rules are in place and all staff are performing their roles.
- Offenders may be subject to disciplinary measures at the discretion of the shift managers.



Studio Rules

- To protect the integrity of games being played, only those participating in the current scheduled game are to be allowed within each studio. **This includes:**
 - Two gamers for eBasketball and eSoccer
 - One referee (unless being trained, then a second referee is allowed)
 - One caster
 - Shift manager or senior referee may enter during live matches to uphold integrity



Unique Game Settings

- In-game settings are to be checked at the start of every new shift by Management and during the day by referees to ensure they are accurate across all streams and follow the agreed ruleset.
- When new game versions are released, the game settings are reviewed and updated based on feedback and data from testing phases.



PC Hardware Integrity

- Only two active USB ports on each PC, which are for mouse and keyboard, all other USB ports are disabled or blocked with USB locks to prevent any attempts to run software which may give a competitive advantage.
- Network firewall in place to prevent communication with persons outside of the operation during broadcast.
- All PC activity is tracked by SIS's IT department.



Gamer Integrity

- To help protect their identity Gamers receive a gamer tag which keeps them anonymous from anyone outside the organization.
- To protect SIS, the product, and our customers, the use of communication devices on site is restricted to prevent the sharing of information about the operation and combat match-fixing.
- Employment agreements and contracts include prohibitions against the sharing of information that could affect the integrity of the product.
- All Gamers are over the age of 18, are professional athletes, and are compensated for their game play.

GAMER ANALYSIS

Gameplay analysis is extremely important to SIS and essential to providing the best possible competitive gaming product. Monitoring scores per half or quarter, utilizing an Elo rating system to match competitors, and analyzing any anomalies are crucial aspects of ensuring the **integrity** of our product. Below are each of the components and a better understanding of their significance.



Monitoring scorelines

Monitoring scorelines allows SIS to keep track of the performance of different teams and individuals, which is essential for effective matchmaking and maintaining a fair and balanced betting environment. SIS aims to keep games and scores as competitive as possible and focuses on creating the most exciting matches possible. This extends from the first minute to the last minute. Gamer incentives are designed to ensure gamers compete consistently throughout the match.

 **Elo Rating System**

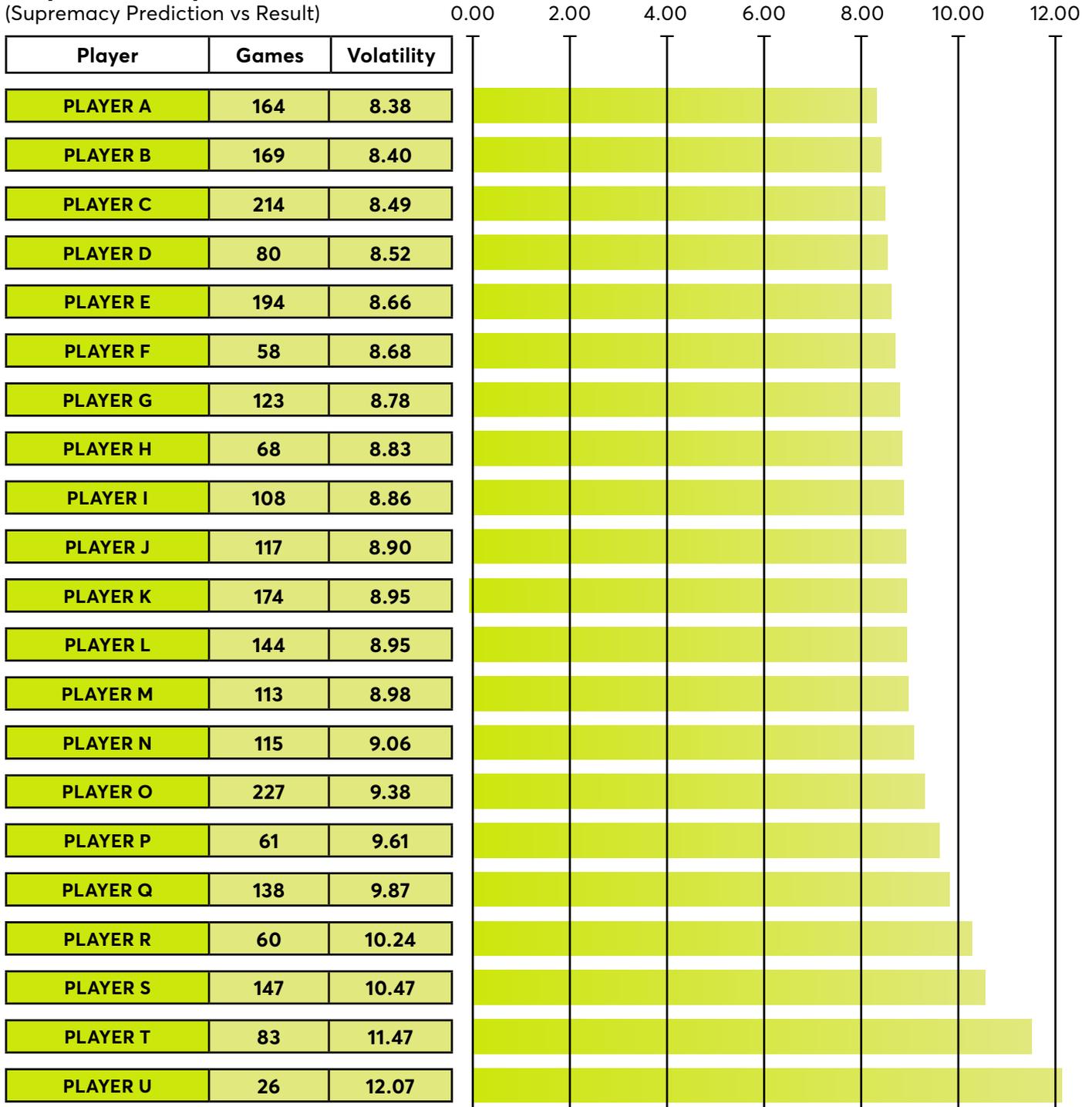
The Elo Rating System, originally developed for chess but now widely used in various competitive activities including esports, provides a numerical rating to quantify the skill level of a player. For SIS's esports product, the goal is to ensure fair and balanced matchups by pairing players with similar Elo ratings against each other. Not only does this enhance the overall experience for users, it increases the competitiveness of events and promotes a reliable and trustworthy product.

 **Analyzing anomalies**

Anomalies, or unexpected and irregular patterns in results, can have a significant impact on the profitability of a sportsbook product. By conducting thorough analysis, the platform can detect any anomalies that may indicate suspicious activities, such as match-fixing or cheating. Identifying and addressing such anomalies is crucial for maintaining the integrity and fairness of the platform. It helps protect the interests of the users and builds confidence in the system, ultimately leading to increased user engagement and profitability.

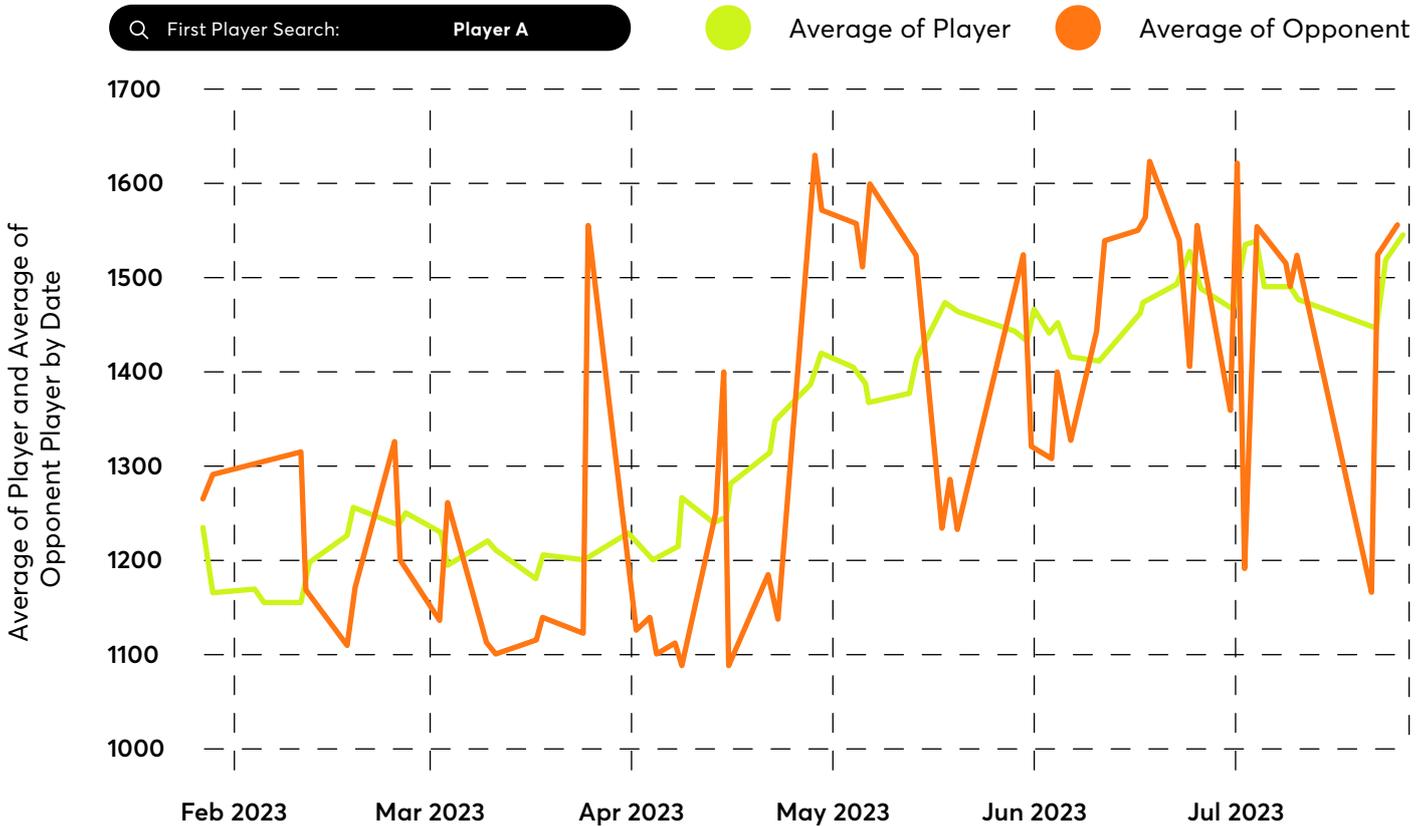
Player Volatility

(Supremacy Prediction vs Result)



Our professional gamers are continuously monitored by operations and trading teams to ensure their skill rating is accurate and that they are playing in the most competitive matches possible. Player volatility is monitored and continuously scrutinized to ensure score variance is stable and that gamers are playing on the correct stream and against the correct opponents.

Monitoring tools and dashboards allow internal teams to conduct thorough gamer analyses to pinpoint anomalies to avoid issues with odds pricing and operational scheduling. Rather than just monitoring win percentage, SIS considers the more in-depth data around who each gamer is playing against and who they should continue playing against.



Lose Multiple Quarters (Last 2 weeks)		Lose Multiple Quarters (Last 6 weeks)		Win % (Last 2 weeks)		Win % (Last 6 weeks)	
2.08%		1.92%		64.58%		50.96%	
Give Up Whilst Losing				Give Up Whilst Winning			
Lose by 20pts % (Last 2 weeks)		Lose by 20pts % (Last 6 weeks)		Q4Win% When Leading (Last 2 weeks)		Q4Win% When Leading (Last 6weeks)	
8.33%		4.81%		61.54%		48.48%	
Lose by 30pts % (Last 2 weeks)		Lose by 30pts % (Last 6 weeks)		Games Played (Last 2 Weeks)		Games Played (Last 6 Weeks)	
0.00%		1.44%		48		208	

The SIS esports product offering is primarily focused toward in-play betting. Operators benefit from markets and bet types that are familiar to current sports bettors.

Ebasketball			
Types	No. of Selections	Pre-Match?	Live?
Money Line	2	Y	Y
Match Betting	3	Y	Y
Match Handicap	2	Y	Y
Total Points	2	Y	Y
1st Half Money Line	2	Y	Y
1st Half Betting	3	Y	Y
1st Half Handicap	2	Y	Y
1st Half Total Points	2	Y	Y
2nd Half Money Line	2	Y	Y
2nd Half Betting	3	N	Y
2nd Half Handicap	2	N	Y
2nd Half Total Points	2	N	Y
1st Quarter Money Line	2	N	Y
1st Quarter Betting	3	Y	Y
1st Quarter Handicap	2	Y	Y
1st Quarter Total Points	2	Y	Y
2nd Quarter Money Line	2	Y	Y
2nd Quarter Betting	3	Y	Y
2nd Quarter Handicap	2	N	Y
2nd Quarter Total Points	2	N	Y
3rd Quarter Money Line	2	N	Y
3rd Quarter Betting	3	N	Y
3rd Quarter Handicap	2	N	Y
3rd Quarter Total Points	2	N	Y
4th Quarter Money Line	2	N	Y
4th Quarter Betting	3	N	Y
4th Quarter Handicap	2	N	Y
4th Quarter Total Points	2	Y	Y
Winning Margins Home	5	Y	Y
Winning Margins Away	5	Y	Y
Total Points Band	16	Y	Y
Home points Band	9	Y	Y
Away Points Band	9	Y	Y

Esoccer			
Types	No. of Selections	Pre-Match?	Live?
3way	3	Y	Y
Double Chance	3	Y	Y
Draw No Bet	2	Y	Y
Match Handicap	2	Y	Y
Winning Margins	6	Y	Y
Next Team To Score	3	Y	Y
Total Goals	2	Y	Y
Clean Sheet Home Team	2	Y	Y
Clean Sheet Away Team	2	Y	Y
Both Teams to Score	2	Y	Y
Correct Score	12	Y	Y
Odd / Even Goals	2	Y	Y
Halftime / Fulltime	9	Y	Y
Matchbet & Both Teams to Score	6	Y	Y
1st Half Result	3	Y	Y
1st Half Double Chance	3	Y	Y
1st Half Draw No Bet	2	Y	Y
1st Half Handicap	6	Y	Y
1st Half Winning Margins	6	Y	Y
1st Half Total Goals	2	Y	Y
1st Half Both Teams to Score	2	Y	Y
2nd Half Result	3	Y	Y
2nd Half Double Chance	3	Y	Y
2nd Half Draw No Bet	2	Y	Y
2nd Half Handicap	2	Y	Y
2nd Half Winning Margins	6	Y	Y
2nd Half Total Goals	2	Y	Y
2nd Half Both Teams to Score	2	Y	Y
2nd Half Odd / Even Goals	2	Y	Y
Player A - Exact Goals	9	Y	Y
Player B - Exact Goals	9	Y	Y
Match Exact Goals	14	Y	Y

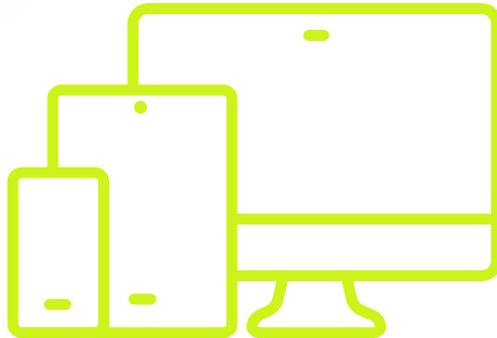
LOW LATENCY VIDEO

Synchronized, real-time video powers engaging betting experiences, extends the betting window and puts bettors on an even playing field.

High latency shortens the available betting window and can lend itself to fraud and arbitrage. A lack of audience synchronization puts bettors on an uneven playing field, and video feed crashes from flash crowds lead to the loss of entire audiences.

The SIS esports streaming solution delivers robust, **ultra-low-latency, synchronized video**. With delay from the in-game action to the bettor measured in milliseconds rather than minutes, betting windows are lengthened, new engagement opportunities unlocked, and chances of past posting eliminated.





For more information on SIS's integrity protocols, please [click here](#)

SISUSTeam@sis.tv
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eSports FAQ

What is eSports? How is it different from virtual sports?

The term eSports is the catch-all term for organized, competitive video gaming. A human will use a controller to cause something to occur on a digital interface (such as making an avatar kick a soccer ball).

In contrast, “virtual sports” refers to a computer-simulated sporting event driven entirely by a random number generator (RNG), with no human input.

What types of eSports are there?

Popular genres of eSports include:

- Multiplayer online battle arenas (MOBAs) such as League of Legends or Dota 2;
- Shooter games such as Fortnite or Counter-Strike;
- Sports games like FIFA, NBA2K, or Madden;
- Fighting games like Super Smash Bros or StreetFighter.

What are the most popular eSports?

If measured in terms of viewership, the five most popular eSports in 2025 were Mobile Legends: Bang Bang, League of Legends, Counter-Strike, Valorant, and PUBG Mobile.¹

If measured in terms of prize pools, in the last 5 years, the games with the largest prize pools for tournament events have been: Dota 2 for \$15.1 million (Riyadh Masters 2023), Arena of Valor for \$10 million (Honor of Kings International Championship 2022), PUBG with \$7 million (PGL.S 2021 Main Event), Call of Duty with \$4.6 million (Call of Duty League Championship 2020), and Fortnite for \$4 million (FNCS: Global Championship 2023).²

Who is the audience of eSports?

The Amazon-owned Twitch.tv, the leading live-streaming platform for esports, is ranked among the 30 most-visited websites globally and averages over 100 million monthly viewers.³ Roughly two-thirds of its audience is under the age of 34.⁴

Who are eSports athletes?

Professional eSports players often compete as part of sponsored teams such as Team Liquid, G2 Esports, or Cloud9. These organizations provide coaching, salaries, and sponsorships similar to traditional sports teams.

¹ As measured in peak viewership per <https://escharts.com/top-games?order=peak>.

² This list was curated to include 5 unique games. If the same game was the highest and second highest paying tournament in the last 5 years, it was only included once, and the next highest paying unique game was listed. <https://www.esportsearnings.com/tournaments>

³ [https://en.wikipedia.org/wiki/Twitch_\(service\)](https://en.wikipedia.org/wiki/Twitch_(service))

⁴ <https://backlinko.com/twitch-users>

What is the competition structure for eSports?

The competition structure tends to revolve around tournaments which may be organized by the game's publisher or independent groups that specialize in organizing tournaments ("TO"s – Tournament Organizers). For many eSports, the tournaments are "open," which means that amateur players could compete against professionals in the early stages of competition. At the championship level, competition is often exclusively between professionals (as these players are the ones who are successful enough to qualify for the highest levels of competition). Championship events or "main events" for the most popular e-sports are usually held in-person in large arenas. Early stages of competition may be held online.

Are there integrity monitoring groups?

Yes. SIS's eSport products is among those overseen under ESIC's standards, with referees and integrity procedures incorporated into every match.

In addition, tournament organizers will craft or adopt additional integrity policies for their events.

Which US jurisdictions allow wagering on e-sports?

A total of 17 jurisdictions currently authorize wagering on eSports: New Jersey, Missouri, West Virginia, Kansas, Connecticut, Wyoming, Kentucky, North Carolina, Tennessee, Virginia, Vermont, Ohio, Arizona, Colorado, Maryland, Washington D.C., and Ontario.

Virginia currently limits wagering to SIS's "H2H Global Gaming League," while other jurisdictions allow a broader range of eSports events. Most states specify approved titles and tournament organizers in their event catalogs.

For the jurisdictions which allow wagering on eSports, what kinds of eSports or competitions are allowed?

In Virginia, wagering on eSports is limited to events put on by SIS Content Services' "H2H Global Gaming League."⁵

All other jurisdictions allow other eSports competitions (with some jurisdictions offering both SIS offerings and other e-sports competitions).

The most effective catalogs specify which e-sport/game is allowed and which events or tournament organizers' events within that game are allowed.

⁵ This league is wholly owned, organized, broadcast, etc. by SIS Content Services, Inc. for the purposes of providing data to wagering providers. SIS is an ESIC member. As of Oct. 2025, SIS offers eSoccer, eBasketball, and eFootball offerings.



Legal Division

TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM Justin Stempeck, Chief Deputy General Counsel

CC: Caitlin Monahan, Director, Investigations and Enforcement Bureau ("IEB")

RE: 205 CMR 116.10: *Interim Authorization*

DATE: February 26, 2026

Overview:

Enclosed for the Commission's consideration is the final draft of 205 CMR 116.10: *Interim Authorization*. The regulation was first presented on December 18, 2025, and the Commission voted to start the promulgation process. A public hearing was held on February 10, 2026, and there were no comments received by the Commission. The regulation is now back before the Commission with an amended small business impact statement, and a request for a vote for final adoption. This regulation amendment is authorized by M.G.L. c. 23K, §§ 4(37), 5, 12, 14, 16.

Background:

The Legal Division and the Investigations and Enforcement Bureau (IEB) jointly conducted a review of the process set forth in 205 CMR 116.00, *Persons Required to be Licensed or Qualified*. This review was undertaken as part of the Legal Division's routine evaluation of regulations that may require amendment and was further informed by a recent matter involving Bally's. Although Bally's situation did not constitute a full transfer of interest, it revealed several process and timing concerns identified by the IEB. In response, the proposed amendments are intended to improve clarity, efficiency, and administrative manageability should a transfer of interest arise in the future.

Discussion:

As amended, the Commission would have the opportunity to decide whether to request an interim authorization report from the IEB or to proceed to a full suitability review on a case-by-case basis. Additionally, the amendments retain required timelines for both interim and full authorization but allow the Commission to extend the required timelines if necessary.

For ease of reference, a copy of the December 18, 2025, memorandum for 205 CMR 116.00, is attached hereto.



Massachusetts Gaming Commission



Legal Division

TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM Justin Stempeck, Interim General Counsel, Legal Division
Caitlin Monahan, Director, Investigations and Enforcement Bureau ("IEB")

RE: 205 CMR 116.10: *Interim Authorization*

DATE: December 18, 2025

Overview:

Enclosed for the Commission's consideration is the proposed draft of 205 CMR 116.10: *Interim Authorization*. The proposed amendment is scheduled to come forward for initial presentation and a request for a vote of approval to start the promulgation process. This regulation amendment is authorized by M.G.L. c. 23K §§ 4(37), 5, 12, 14, 16.

The proposed amendments, which are explained in full below, make two main changes to the regulation. First, as amended, the Commission would have the opportunity to decide whether to request an interim authorization report from the IEB or to proceed to a full suitability review on a case by case basis. Second, the amendments retain required timelines for both interim and full authorization but allow the Commission to extend those timelines if necessary.

Background:

The Legal Division and the Investigations and Enforcement Bureau (IEB) jointly conducted a review of the process set forth in 205 CMR 116.00, *Persons Required to be Licensed or Qualified*. This review was undertaken as part of the Legal Division's routine evaluation of regulations that may require amendment and was further informed by a recent matter involving Bally's. The Bally's matter revealed several process and timing concerns identified by the IEB. In response, the proposed amendments are intended to improve clarity, efficiency, and administrative manageability should a transfer of interest arise in the future.

Discussion of Regulation Changes:

- I. Titles were added to the following sections for the purpose of uniformity:

205 CMR 116.10(3): *Request for Interim Authorization*
205 CMR 116.10(4): *Effect of Denial of Interim Authorization*
205 CMR 116.10(5): *Bureau Investigation*
205 CMR 116.10(7): *Power of Trustee*



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205 CMR 116.10(8): Termination of Trust Agreement

205 CMR 116.10(9): Effect on Negative Determination of Suitability

II. The word “and” was removed to clarify that a circumstance may implicate “205 CMR 116.02 ~~and~~ or M.G.L. c. 23K.”

205 CMR 116.10(1): Contractual Transfers

205 CMR 116.10(2): Transfers of Publicly Traded Securities

III. Substantive changes:

205 CMR 116.10(3):

Currently, a business entity who wants to take over an interest (a “prospective transferee”) must submit a complete RFA-1 application and the IEB must submit its interim authorization report 90 days after a complete application is submitted. Following, the Commission must hold a hearing and render a decision within 30 days after the IEB submits its report (therefore the hearing and decision must occur within 120 days of the complete application filing).

The proposed changes would make this process more flexible. Specifically, the Commission would be able to request the interim authorization report on a case by case basis, rather than a default standard that the report is produced.

205 CMR 116.10(4):

The Commission may deny interim authorization after a hearing. A sentence was added to clarify that in addition to a denial after a hearing, another process may occur where the commission does not request the IEB to produce an interim authorization report.

205 CMR 116.10(5):

Under this section the Commission can grant interim authorization only if it makes eight specific findings listed in 205 CMR 116.10(5). These findings relate to whether the application materials are complete, whether the applicant meets basic qualification standards, and whether there is no early indication of disqualifying information about the proposed transferee.

Currently, within nine months of the interim authorization decision, the Commission is required to hold a hearing and render a determination on the applicant’s suitability, and the Commission may grant a one-time, three-month extension. The proposed change allows for a longer extension period at the Commission’s discretion.

The next change allows the interim authorization report to be submitted within 90 days of a complete RFA-1 application being filed *or at such a later date as the commission may allow*.

Lastly, language was added that, *if the Commission requests* it under 205 CMR 116.10(3), the IEB must prepare and submit the interim authorization report. In addition, language was added to clarify



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that if the Commission denies interim authorization or chooses not to request it, the Commission/IEB will continue with the standard qualification process described in 205 CMR 116.07 and shall complete that process within thirteen months of a completed RFA-1 application, which may be further extended by the commission.



Massachusetts Gaming Commission

116.09: continued

(2) The commission may reject any transfer requiring approval pursuant to 205 CMR 116.09(l) that it finds would be disadvantageous to the interests of the Commonwealth of Massachusetts. A transfer may be considered disadvantageous to the interests of the Commonwealth if the commission determines that the proposed transferee does not satisfy the applicable considerations set forth in M.G.L. c. 23K, §§ 12, 15, 16, and/or 18, as applicable, 205 CMR 115.00: *Phase 1 and New Qualifier Suitability Determination, Standards, and Procedures*, or any other applicable provisions of M.G.L. c. 23K or 205 CMR, and/or the transferee does not satisfy the provisions of 205 CMR 129.01: *Review of a Proposed Transfer of interests*.

(3) Pursuant to M.G.L. c. 23K, § 20(e), the commission shall not approve the transfer of the category 2 gaming license for five years after the initial issuance of the license unless one of the following has occurred:

- (a) the parent, holding company, or intermediary company of the gaming licensee experiences a change in ownership resulting in a change of control;
- (b) the gaming licensee fails to maintain suitability; or
- (c) the commission determines that other circumstances exist which affect the gaming licensee's ability to operate the gaming establishment successfully.

(4) The commission shall not approve of any transfer that would result in the transferee having a financial interest in more than one gaming license issued by the commission.

116.10: Interim Authorization

(l) Contractual Transfers. Whenever any person contracts to transfer a gaming license or a ownership interest in a gaming licensee or its parent, holding or intermediary company, or any real property relating to a gaming establishment, under circumstances which require that the transferee obtain licensure or be found qualified pursuant to 205 CMR 116.02 ~~and/or~~ M.G.L. c. 23K, the contract shall not specify a closing or settlement date which is earlier than 121 days after the submission of a completed RFA-1 application as described in 205 CMR 111.00: *Phase 1 Application Requirements*. Such RFA-1 application shall be accompanied by a fully executed trust agreement in accordance with 205 CMR 116.10(6) which shall be subject to commission approval. Any contract provision which specifies a closing or settlement date sooner than 121 days after submission of the RFA-1 application shall be void for all purposes.

(2) Transfers of Publicly Traded Securities. Whenever any person, as a result of a transfer of publicly traded securities of a gaming licensee or its parent, holding or intermediary company, is required to be qualified under 205 CMR 116.02 ~~and/or~~ M.G.L. c. 23K, the person including all related qualifiers shall, within 30 days after a Schedule 13D or 13G is filed with the U.S. Securities and Exchange Commission, or after the bureau notifies the person that qualification is required, or within such additional time as the bureau may for good cause allow, file a completed RFA-1 application for such licensure or qualification as described in 205 CMR 111.00: *Phase 1 Application Requirements*. Such RFA-1 application shall be accompanied by a fully executed trust agreement in accordance with 205 CMR 116.10(6) which shall be subject to commission approval. No extension of the time for filing a completed RFA-1 application shall be granted unless the person submits a written acknowledgement recognizing the jurisdiction of the commission and the obligations imposed by M.G.L. c. 23K and 205 CMR. If a proposed transferee, including all related qualifiers, fails to timely file a complete RFA-1 application, such failure shall constitute a ~~per-se~~ negative finding of suitability to continue to act as a security holder, and the commission shall take appropriate action including requiring divestiture by the transferee or redemption of the securities by the transferor.

(3) Request for Interim Authorization. If a prospective transferee files a ~~complete an~~ RFA-1 application in a timely manner the commission may then request the bureau to produce an interim authorization report under 205 CMR 116.10(5). Within 30 days after the bureau's submission to the commission of the interim authorization report, the commission shall hold a hearing in accordance with 205 CMR 115.04: Phase 1 and New Qualifier Proceedings by the Commission and render a decision on the interim authorization of the proposed transferee within 120 days after such filing or, if it is a contractual transfer, prior to the proposed closing or settlement date. If interim authorization is approved for a transfer governed by 205 CMR 116.10(l) then the closing or settlement may occur, and the prospective transferee may hold the securities or interests subject to the provisions of 205 CMR 116.10(4) until a final determination of suitability is made by the commission. If interim authorization is approved for a transfer governed by 205 CMR 116.10(2) then the prospective transferee may continue

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to hold the securities or interests subject to the provisions of 205 CMR 116.10(4) until a final determination of suitability is made by the commission.

116.10: continued

(4) Effect of Denial of Interim Authorization. If, the commission does not request the bureau to produce an interim authorization report, or, after a hearing, the commission denies interim authorization, there shall be no closing or settlement of a contract to transfer an interest governed by 205 CMR 116.10(1) until the commission makes a final determination on the suitability of the transferee in accordance with 205 CMR 115.00: *Phase I and New Qualifier Suitability Determination, Standards, and Procedures*. If the commission denies interim authorization for a proposed transfer subject to 205 CMR 116.10(2), all securities and interests subject to the transfer shall be promptly transferred into the trust. If the commission grants interim authorization for any transfer, it may at any time thereafter order all securities and interests subject to the transfer transferred into the trust if it finds reasonable cause to believe that the proposed transferee may be found unsuitable. If a prospective transferee fails or refuses to timely transfer securities and interests into the trust upon direction from the commission said transferee shall be issued a negative determination of suitability.

(5) Bureau Investigation. After determining that a person is required to be qualified in accordance with 205 CMR 116.02, the bureau shall commence an investigation into the suitability of the transferee in accordance with 205 CMR 115.00: *Phase I and New Qualifier Suitability Determination, Standards, and Procedures*. If the commission so requests pursuant to 205 CMR 116.10(3), ~~The~~ bureau shall produce and forward to the commission an interim authorization report no later than 90 days after the date that a completed RFA-1 application is submitted by the proposed transferee, or such later date as the commission may allow, that indicates whether after initial inquiry into the transferee's suitability any apparent disqualifiers have been revealed or there is any other known reason why a positive determination of suitability may not ultimately be achieved. ~~The~~Following a hearing, the commission may approve interim authorization if it finds that:

- (a) The transferee has submitted all RFA-1 applications as required by 205 CMR 115.01(3): *New Qualifiers*;
- (b) The transferee has submitted a fully executed trust agreement in accordance with 205 CMR 116.10(6);
- (c) The trustee or trustees required under section 205 CMR 116.10(6) have satisfied the qualification criteria applicable to a Key gaming employee-executive in accordance with 205 CMR 134.00: *Licensing and Registration of Employees, Vendors, Junket Enterprises*;
- (d) There is no preliminary evidence of anything that would serve to disqualify the transferee from licensure in accordance with M.G.L. c. 23K, §§ 12 and 16 nor is there any other reason known at the time why a positive determination of suitability may not ultimately be achieved;
- (e) The transfer would not violate 205 CMR 116.09(3) or (4);
- (f) The transferee has certified that they are unaware of any reason why the transferee would not be found qualified pursuant to M.G.L. c. 23K, §§ 12 and 16. (If the transferee is other than an individual, the certification shall be made by the chief executive officer or like individual);
- (g) It is in the best interests of the Commonwealth for the gaming establishment to continue to operate pursuant to interim authorization; and
- (h) If the transfer will result in a change of control, the transferee has agreed in writing in accordance with 205 CMR 129.01: *Review of a Proposed Transfer of Interests* to comply with all of the transferor's existing license obligations or has otherwise petitioned the commission for modification or elimination of one or more of those obligations.

If the ~~E~~commission approves interim authorization, during the period of interim authorization, the bureau shall continue its suitability investigation as may be necessary for a determination of the suitability of the person granted interim authorization. Within nine months after the interim authorization decision, which period may be extended by the commission ~~for one three month period,~~ the commission shall hold a hearing and render a determination on the suitability of the applicant in accordance with 205 CMR 115.04: *Phase I and New Qualifier Proceedings by the Commission*. If the commission denies interim authorization, or no interim authorization is requested, the commission and bureau shall proceed with the qualification process pursuant to 205 CMR 116.07, and shall complete that process within thirteen months of the submittal of a completed RFA-1 application, which thirteen month period may be further extended by the commission.

(6) Trust Agreements. A trust agreement required to be submitted with an RFA-1 application in accordance with 205 CMR 116.10(1) and (2) shall be fully executed upon submission and contain, at a minimum, the following:

- (a) A provision for the transfer and conveyance to the trustee of all of the transferee's

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proposed present and future right, title and interest in the gaming licensee, or its parent, holding or intermediary company, including all voting rights in securities upon the occurrence of an event described in 205 CMR 116.10(4) or if otherwise directed to do so by the bureau in its discretion, pending a final suitability determination by the commission.

116.10: continued

- (b) A provision consistent with the provisions of 205 CMR 116.10 for the distribution of any trust res upon a positive determination of suitability, negative determination of suitability, or at the direction of the commission in accordance with 205 CMR 116.10(8).
- (c) A provision identifying the trustee(s) and requiring the trustee to timely submit an application for qualification as a Key Gaming Employee-Executive and be found qualified by the commission in accordance with M.G.L. c 23K, § 30 and 205 CMR 134.00: *Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations*.
- (d) A provision identifying the compensation for the service, costs and expenses of the trustee(s), which shall be made subject to the approval of the commission.
- (e) Any additional provisions the commission deems necessary and desirable.

(7) Power of Trustee. The trustee of the trust shall exercise all rights incident to the ownership of the property subject to the trust, and shall be vested with all powers, authority and duties necessary to the unencumbered exercise of such right, and the transferee shall have no right to participate in the earnings of the gaming licensee or receive any return on its investment or debt security holdings during the time the securities or interest are in the trust. Earnings may, however, accrue to or into the trust.

(8) Termination of Trust Agreement. The trust agreement shall remain operative until the commission issues the transferee a positive determination of suitability (and in the event the interest has been placed into the trust, the trustee distributes the trust res) or the commission issues the transferee a negative finding of suitability and the trust res is disposed of in accordance with 205 CMR 116.10(9). The trust shall otherwise only be revocable prior to a determination of suitability being issued upon commission approval at the request of the settlor. In the event of such a request the commission may direct the trustee to dispose of the trust res in accordance with 205 CMR 116.10(9).

(9) Effect of Negative Determination of Suitability. If the commission issues a negative determination of suitability in accordance with 205 CMR 115.05: *Phase 1 and New Qualifier Determination by the Commission*, a contract for the transfer of interests shall thereby be terminated for all purposes without liability on the part of the transferor. In the event of such negative determination, where the subject interests have been transferred into a trust in accordance with 205 CMR 116.10(4), the trustee shall endeavor and be authorized to attempt to sell, assign, convey or otherwise dispose of all trust res in accordance with the means approved in accordance with 205 CMR 116.11 or as otherwise directed by the commission. Any subsequent transferee must be appropriately licensed or qualified in accordance with 205 CMR 116.00. The disposition of trust res by the trustee shall be completed within 120 days of the denial of qualification, or within such additional time as the commission may for good cause allow. The proceeds of such disposition shall be distributed to the unsuitable transferee only in an amount not to exceed the lower of the actual cost of the assets to such unsuitable transferee, or the value of such assets calculated as if the investment had been made on the date the assets were transferred into the trust, and any excess remaining proceeds shall be paid to the Massachusetts Gaming Control Fund in accordance with M.G.L. c. 23K, § 57.

116.11: Unsuitable Qualifiers

An unsuitable qualifier may not hold an interest in a gaming license. A gaming licensee's articles of organization or other document governing the sale or transfer of securities or other interests shall contain provisions in a form approved by the commission stating that the sale, assignment, transfer, pledge or other disposition of any security issued by it is conditional and shall be ineffective if disapproved by the commission. Further, a gaming licensee shall have a mechanism approved by the commission in place by which it may effectuate divestiture or redemption of securities, or a like process, in the event of a negative determination of suitability being issued to a person required to be qualified.

REGULATORY AUTHORITY

205 CMR 116.00: M.G.L. c. 23K, §§ 4(37), 5, 12, 14, and 16.



Legal Division

TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Justin Stempeck, Chief Deputy General Counsel
Carrie Torrisi, Chief, Sports Wagering Division

RE: 205 CMR 238.30: *Acceptance of Sports Wagers*

DATE: February 26, 2026

Overview:

Enclosed for the Commission's consideration is the final draft of 205 CMR 238.30: *Acceptance of Sports Wagers*. The regulation was first presented on December 18, 2025, and the Commission voted to start the promulgation process. A public hearing was held on February 10, 2026, and the Commission received several written comments. The regulation is now back before the Commission with an amended small business impact statement, and a request for a vote for final adoption. This regulation amendment is authorized by M.G.L. c. 23N § 4.

Discussion:

On September 30, 2025, the Commission discussed the operator practice of "limiting" the betting amounts of customers of Massachusetts licensed sports books. After a thorough review based on reported data, the Commission, Legal, and Sports Wagering Divisions, presented two drafts of regulatory options to consider on this topic. Each option required addressing patron limiting as part of an operator's procedures detailed in their internal controls under 205 CMR 238.30.

After in depth discussion, on December 18, 2025, the Commission decided to proceed with a regulation that would require "Procedures to provide timely notice to a patron that their wagering activity has been limited, including a specific explanation for the attachment of the limit(s), and identification as to which market(s) are so limited."

It is important to note that in practice, the sports wagering operators would have flexibility in designing their procedures to comply with the regulation, however, the sports wagering operators would be required to send their internal controls procedure to the Sports Wagering Division and the Executive Director for review and approval.

Comments:



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During the public comment period for this regulation, the Commission received s written comments from consumers. These comments generally expressed concerns regarding the perceived unfairness of limiting practices and deficiencies in how such limits are communicated by operators to customers. One commenter also provided substantive feedback on the proposed regulatory amendments, including examples of notification language, suggested revisions and definitions, and a request for additional detail and clarification.

The Commission received an additional three written comments from sports wagering operators. One operator expressed general support for the Commission’s decision to allow flexibility in the method and content of customer notifications. A second operator submitted questions seeking interpretive guidance and requested the opportunity to discuss the implementation timeline. The third operator identified specific challenges related to its interpretation of the reporting obligation and presented three alternative approaches for the Commission’s consideration.



Massachusetts Gaming Commission

238.27 : Prohibition of Credit Extension

A system of internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include controls relating to the prohibition of a Sports Wager, issuance of cash, or deposit of funds into a Sports Wagering Account that is derived from the extension of credit by affiliates or agents of the Sports Wagering Operator pursuant to M.G.L. c. 23N, § 4(d)(2)(viii). For purposes of 205 CMR 238.27, credit shall not be deemed to have been extended where, although funds have been deposited into a Sports Wagering Account, the Sports Wagering Operator is awaiting actual receipt of such funds in the ordinary course of business.

- (1) Credit providers such as small amount credit contracts (payday lending) shall not be advertised or marketed to patrons.
- (2) A patron shall not be referred to a credit provider to finance their Sports Wagering activity.
- (3) Confidential Information and Personally Identifiable Information related to a patron shall not be provided to any credit provider.

238.28 : Events, Odds and Result Management

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include procedures regarding the selection of the events and for setting and updating the odds, wagering margins or blocking events, as well as for receiving the results from reliable sources. Procedures shall exist for validating accuracy and preventing fraudulent activities. Such procedures shall be based on the respect of integrity, responsible gaming, and ensuring transparency.

238.29 : Monitoring the Sports Wagering Activities

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include procedures for monitoring all changes to odds or blocking throughout a Sporting Event, monitoring of the Wager category, events and patron transactions for the detection of irregularities, monitoring of winners over a certain amount of gains, and deposits over a certain size. Such procedures shall also specify thresholds of payment and methods of collection.

238.30 : Acceptance of Sports Wagers

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include procedures relative to the Sporting Events and their Wager categories offered for Sports Wagering pursuant to 205 CMR 247.00: *Uniform Standards of Sports Wagering*. Such procedures shall include the following:

- (1) The adoption, maintenance and updating of House Rules;
- (2) Processes for submitting or receiving approval for Sporting Events and Wager categories;
- (3) Descriptions of the processes for accepting Wagers and issuing payouts, plus any additional controls for accepting Wagers and issuing payouts in excess of \$10,000;
- (4) Descriptions of the processes for accepting multiple Wagers from one patron in a 24-hour cycle, including the process to identify structuring of Wagers to circumvent recording and reporting requirements;
- (5) Identification of all data sources used in a Sports Wager determination;
- (6) Description of the processes for line setting and line moving;
- (7) Procedures to review the completeness, accuracy, reliability, timeliness, and availability of any data feeds used to offer or settle Sports Wagers;

238.30 : continued

(8) Processes for submitting or receiving approval for Sports Wagering tournaments, contests, or pools;

(9) Procedures for issuance and acceptance of promotional gaming credits for Sports Wagering; and

(10) Procedures to identify a Wager or an attempt to Wager above any maximum Wager threshold set by the Sports Wagering Operator that qualifies as unusual or suspicious Wagering.

~~(10)~~(11) Procedures to provide timely notice to a patron that their wagering activity has been limited, including a specific explanation for the attachment of the limit(s) and identification as to which market(s) are so limited.

238.31 : In-Game or In-Play Wagering

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall include procedures to assure and monitor the integrity of the in-game or in-play Wagering offering, the results handling and patron protection. Indicative areas for consideration in the procedure for results handling shall include, but not be limited to, time delays, sources of results, and reversal of results. The procedures shall also account for courtsiding prevention mechanisms including a delay in live pictures.

238.32 : Restricted Patrons

A system of Internal Controls submitted by a Sports Wagering Operator in accordance with 205 CMR 238.02 shall meet the requirements of 205 CMR 243.01(1)(t) and include the following in accordance with M.G.L. c. 23N, § 11(a):

(1) No Sports Wagering Operator, directors, officers, owners, employees, subcontractors, or Qualifiers of the Sports Wagering Operator, as well as those within the same household as any such Person, may place Sports Wagers with the Sports Wagering Operator, or with any other Sports Wagering Operator tethered to the Operator, on any event, except in private pools where the player's association with the Sports Wagering Operator is clearly disclosed. Nor may such individual place Sports Wagers through another person as a proxy or agent. However, Sports Wagering Operator employees may use clearly marked test accounts for testing purposes such as evaluating a Sports Wagering Platform. Sports Wagering Operators shall make these restrictions known to all affected individuals and corporate entities.

(2) No individual with proprietary or non-public information held by the Sports Wagering Operator may place Sports Wagers with the Sports Wagering Operator, or with any other Sports Wagering Operator tethered to the Operator. Nor may such individual place Sports Wagers through another person as a proxy or agent. Sports Wagering Operators shall make these restrictions known to all affected individuals and corporate entities.

(3) No Sports Wagering Operator shall allow a professional or athlete, coach, referee, team owner, employee of a Sports Governing Body or its member teams and patron and referee union personnel, place Sports Wagers on events in the sport in which the individual participates, or in which the athlete the individual represents participates. Nor may such athlete, sports agent, team official, team representative, referee or league official place Wagers through another person as a proxy or agent. A Sports Wagering Operator may not be held liable for a violation of 205 CMR 238.32(3) if:

(a) The Sports Wagering Operator makes commercially reasonable efforts to obtain lists of such Persons for the purpose of implementing 205 CMR 238.32, such as by monitoring for and restricting accounts of such Persons;

(b) The Sports Wagering Operator makes these restrictions known to all affected individuals and corporate entities;

(c) The Sports Governing Body in which the athlete, sports agent, team official, team representative, referee or league official participates, maintains and enforces a policy that excludes such individuals from placing Wagers in that sport;

(d) The Commission has previously used the list of barred employees from the Sports Wagering Operator in accordance with M.G.L. c. 23N, § 11(a)(ii), and worked directly with a member team to determine the risk posed by certain employees for obtaining nonpublic information on a Sporting Event and removed an employee without knowledge of team strategy or game operations from such a list after the Commission determined any such risk is *de minimis*; and

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Monday, February 9, 2026 9:18:51 AM

Submitted By

Operator (Applicant or Licensed)

Business/Entity Name

BetMGM

Name

Jess Panora

Email

jess.panora@betmgm.com

Regulation

205 CMR 238

Subsection

205 CMR 238.30: Acceptance of Sports Wagers

Comments

BetMGM thanks the Commission for offering the opportunity to review and provide comments on the proposed amendments to 205 CMR 238.30. We respectfully submit the following questions requesting clarification to support our development efforts.

1. BetMGM requests clarification regarding the definition of "limiting". For example:
 - a. If a patron's account has a default stake factor, is escalated to a higher stake factor, and then returned to the default stake factor, is this considered limiting?
 - b. If a patron has been limited below the default stake factor, and their stake factor is reduced again, is this considered limiting?
2. BetMGM requests clarification regarding cross-jurisdiction limiting
 - a. If a patron is limited in another jurisdiction, and then wagers in Massachusetts, their limits will apply. Would this scenario trigger a notification requirement?
 - b. If a Massachusetts patron is limited while playing in another jurisdiction, would a notification be required? If so, is the timely notification required upon limiting the patron, or following their next login under their Massachusetts account?

Upon finalization of the revised regulation, BetMGM would appreciate the opportunity to discuss the anticipated timeline for implementation. Should you have any questions about our submission or wish to discuss it further, please feel free to contact us.

CAESARS[®] SPORTSBOOK

February 06, 2026

VIA EMAIL (Melanie.Foxx@massgaming.gov)

Massachusetts Gaming Commission
101 Federal Street
12th Floor
Boston, MA 02110

Re: **American Wagering, Inc d/b/a Caesars Sportsbook Comments on Proposed Rulemaking Regulation 205 CMR 238.30**

Massachusetts Gaming Chair and Commissioners:

American Wagering, Inc. d/b/a Caesars Sportsbook (“Caesars”), respectfully submits the following comments to the Massachusetts Gaming Commission (“Commission”) proposed regulation 205 CMR 238.30 (11), regarding limitations on sports wagers. Caesars would like to thank the Commission for the opportunity to comment on this proposed rule and respectfully requests that the Commission take into consideration the following suggestions.

205 CMR 238.30 (11)

Proposed regulation 205 CMR 238.30 (11) proposes Sports Wagering Operators adopt procedures relative to the practice of limiting patron’s sports wagering accounts. The adopted procedures would require Sports Wagering Operators to provide timely notice to the patron that their wagering activity has been limited. Secondly, within that notification, the Sports Wagering Operator must specify to the patron the reason for the limitation as well as the market to which the limitation is applied.

Gaming wagering limitations is a long standing and carefully considered analytical process used in gaming industry by most brick and mortar and mobile gaming companies. As previously noted with the Commission, gaming wagering limitations are necessary for gaming companies to avoid entering into situations with wagering patrons that may potentially or are suspected to pose a threat to the integrity of gaming in Massachusetts. These threats to gaming integrity could arise based on the background of the patron, potential associations with interests inimicable to a regulated market or due to non-public knowledge relating to a sporting event. Secondly, the patron wager limitation process is designed to simply prompt further wager review by a Sports Wagering Trader and not necessarily initiate an automated wager denial.

Caesars shares the Commission's goal in consumer protection and ensuring a fair and safe gaming environment in the Commonwealth through fair policy making. However, Caesars believes proposed regulation 205 CMR 238.30 (11) presents the following challenges:

- 1) ***Suspicious Activity Reporting Confidentiality Requirements*** - Within proposed Regulation 205 CMR 238.30 (11), it is set forth that it is the duty of Sports Wagering operators to provide timely notice with a specific explanation to a patron that their wagering activity has been limited. Caesars uses several methodologies for determining wagering limitations for accepted wagers. Certain wagers are subjected to a higher degree of scrutiny to ensure the wager has not been compromised by such things as collusion, insider information, or other suspicious activity which would affect the integrity of the wager. In all cases where suspicious activity is suspected but the investigation produces limited information to prohibit the wager, a Suspicious Activity report (SAR) will be filed under Bank Secrecy Act requirements and the patron may be placed on a wager limitation.

As drafted, Caesars believes the specific notification requirement under proposed Regulation 205 CMR 238.30 (11), is an unauthorized disclosure of a SAR which is a violation of Federal law. Under 31 U.S.C. §§ 5318(g)(2), financial institutions are prohibited from disclosing the existence of a SAR to any person involved in the transaction that is the subject of the report. This obligation applies not only to the SAR itself, but also to underlying information (such as that specific information Sports Wagering Operators are required to include in the proposed patron notification) that would reveal or infer the existence (or non-existence) of a SAR.

Therefore, Caesars respectfully proposes three options for Commission's consideration:

1. Incorporate an exemption provision from the patron notification requirement of 205 CMR 238.30 (11) if the underlying information for the patron imitation is also subject to suspicious activity reporting for Sports Wagering Operators under Federal law;
 2. Permit Sports Wagering Operators to provide patrons a broad non-specific explanation, (e.g., "Due to a business decision, a wagering limit has been placed on your account.") for the limitation;
 3. Eliminate the provision for Sports Wagering Operators to provide the patron with a specific explanation for the wager limit entirely.
- 2) ***Timely Notification*** - Proposed regulation 205 CMR 238.30 (11) proposes Sports Wagering Operators to provide "timely" notice to a patron that their wagering activity has been limited. However, this terminology could provide an opportunity for reasonable disagreement on what constitutes "timely" notice.

Caesars utilizes a factor based decisioning system which considers aspects such as

constant market price changes, time to event, relevant athlete/team information, and patron specific factors. As previously noted above, a patron limit is often not a hard limit, but a threshold to which bets are referred to Trading to make a decision. The complexities of Caesars' risk decisioning system requires sufficient time to calculate a player's risk. As such, we would not consider this decision making process to constitute "limiting" a patron's gaming activities, but is rather a core element of market making and the trading function. Accordingly, we would request your guidance that you agree with this interpretation.

Therefore, Caesars respectfully requests that the Commission allow more than 7 business days for Sports Wagering Operators to provide the patron limitation notification.

- 3) **Identification of Markets in Patron Notice Explanation** - Proposed regulation 205 CMR 238.30 (11) proposes Sports Wagering Operators in their notice to a patron regarding wagering limitations to identify the market in which the patron is limited. Caesars believes, with approximately 70,000 markets a day, it would be extremely challenging to differentiate by market versus by sport. Caesars believes that a modification of the proposed regulation in this manner would ensure transparency, fairness, and most importantly, protection of gaming integrity for both patron, Sports Wagering Operators, and the Commission. Therefore, Caesars respectfully requests that the Commission modify this provision to allow Sports Wagering Operators to identify the sport(s) in which the patron is so limited in the patron limitation notification.

We thank the Commission for requesting input on these matters and hope our comments are helpful for your consideration.

Should you have questions or require additional information, please feel free to reach out to me at the contact information below.

Sincerely,



Curtis Lane Jr.
Digital Compliance Manager
curtis.lane@caesars.com

cc: Jeffrey P. Hendricks (Caesars); Lisa Rankin (Caesars);



Cory Fox
Cory.Fox@fanduel.com

February 6, 2026

Via Email to Melanie.Foxx@massgaming.gov
Dean Serpa – Executive Director
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: FanDuel comments on proposed amendment to 205 CMR 238.30

Dear Executive Director Serpa:

I write to provide comments on behalf of FanDuel Group, Inc. (“FanDuel”) regarding the Massachusetts Gaming Commission’s (the “Commission”) proposed amendment to 205 CMR 238.30 – Acceptance of Sports Wagers (the “Rule”). Based on our extensive experience as a sports wagering operator in the Commonwealth and frequent collaborator with sports wagering regulators in many states in the development of their regulations, we offer constructive feedback for the Commission’s consideration on this Rule.

We thank the Commission for affording operators the opportunity to provide comments on the Rule. We appreciate the Commission’s careful consideration of what regulatory changes are appropriate in light of the rare instances where additional limits may be applied to individuals attempting to wager in the Commonwealth.

As discussed in our previous engagement on the topic, all FanDuel customers have a maximum wager limit dependent upon the event, market and time they choose to wager, as well as their individual behavior. In rare cases, customers may have an individual wager limit placed on their account that is less than the generally applicable maximum wager limit. At their core, wager limits facilitate innovation, allowing operators to trial new offerings and expose consumers in the Commonwealth to new sports and leagues in a controlled manner. Limits are an important part of a holistic approach to address competition and integrity wagering concerns, as well as managing the financial risk associated with operating a regulated sportsbook. They can act as a deterrent for bad actors, particularly for new league or competition types, that is separate and apart from the post-transaction monitoring and reporting all operators perform. Moreover, flexible wagering limits provide operators with the ability to grow the Commonwealth’s revenue base, while drawing consumers away from illegal offshore wagering markets. We appreciate the understanding by Commission staff of the importance of wager limits to further cultivate a strong, fair, and regulated sports wagering market for all Bay Staters.

FanDuel further appreciates the thorough undertaking by the Commission staff in the development of this Rule. We support the Commission’s decision to allow for flexibility for how notice is relayed to customers and the language included in such notices. This flexibility allows operators



to implement solutions within their customer journeys that are consistent with the dynamic nature of sports wagering and their individual products. It also acknowledges that all customer journeys are unique and there is no “one-size-fits-all” solution appropriate for all customers.

FanDuel supports a reasoned and pragmatic notification regime. Currently, we conspicuously inform the customer of the maximum wager for their specific selection within their betslips if the customer attempts to place a wager that is greater than their permitted maximum. This approach reflects the complexities associated with the breadth and depth of market offerings in the regulated sports wagering market, where dynamically changing information can have meaningful impacts on the maximum amounts that any individual may wager at any particular point in time and for any individual or combination of market selections. FanDuel’s approach and the Rule reflect the importance of transparency to the customer experience, balancing the importance of operators’ abilities to manage risk and maintain quality of service for everyone with meaningful notice informing customers of limits on their ability to wager.

We appreciate your time and consideration of our comments and would be happy to discuss them at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cory Fox', written over a light blue circular watermark.

Cory Fox
Public Policy and Sustainability Senior Vice President

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Friday, January 23, 2026 12:35:59 AM

Submitted By

Citizen

Name

John Stasci

Email

johnstasci@gmail.com

Regulation

205 CMR 238.30: Acceptance of Sports Wagers

Subsection

205 CMR 238.30(11)

Comments

(11) Procedures to provide timely notice to a patron that their wagering activity has been limited, including a specific explanation for the attachment of the limit(s) and identification as to which market(s) are so limited.

REVISED PROPOSAL for 205 CMR 238.30 (11)

205 CMR 238.30 : Acceptance of Sports Wagers

(11) Procedures to provide timely notice to a patron that their wagering activity has been limited, including a specific explanation for the attachment of the limit(s) and identification as to which market(s) are so limited. Such procedures shall, at a minimum, include:

(a) Timely Notice: The Operator shall provide electronic notice to the patron within 48 hours of the limitation taking effect. This notice shall be delivered via the patron's registered email address.

(b) Specific Explanation: The notice shall provide a clear, concise, and non-generic explanation for the limitation, cross-referenced to the specific behavior(s) identified in the Operator's House Rules as grounds for restriction.

1. Such notice must cite at least one qualifying behavior from the approved House Rules list and provide the evidentiary basis for the limitation, including but not limited to:

- a. The specific wager(s) in question, identified by date/time of placement and unique Ticket ID; and
- b. The Closing Line Value (CLV) associated with said wager(s).

(c) Identification of Limited Market(s): The Operator shall provide a granular disclosure of the specific markets and wager categories affected by the limit.

1. Identification shall be provided via a secure link to a personalized summary or a downloadable file (e.g., CSV) detailing the patron's current "Stake Factor" or maximum wager percentage relative to a standard user for each market type (e.g., NFL Main Lines, NBA Player Props, NCAA derivatives).

(d) Retroactive Disclosure: Upon the effective date of this regulation, Operators shall have up to 60 days to provide a one-time disclosure notice, meeting the requirements of subsections (a) through (c), to all patrons whose accounts are currently subject to a wagering limit or restriction imposed prior to the effective date.

(e) Commission Reporting: Operators shall maintain a record of all limitation notices sent pursuant to this section and shall provide a summary report to the Commission on a quarterly basis, or upon request, to ensure proportionality and fundamental fairness in the application of limits.

(f) Prohibition on Alternative Restrictions: An Operator shall not attempt to circumvent the notice and disclosure requirements of this section by applying "dual-pricing" or "delayed-processing" models to a patron's account in lieu of, or in addition to, a stake limitation. Such prohibited practices include, but are not limited to:

Odds Shading: Offering a patron less favorable odds or prices on a market than those displayed to the general public or a standard user; and

Delayed Placement: Subjecting a patron's wagers to a manual review period, "waiting timer," or any latency period that is not applied to a standard user for the same market.

Note: Any account subjected to these practices shall be deemed "limited" under this section, triggering the full notice and explanation requirements defined in subsections (a) through (c).

EXISTING EMAIL NOTIFICATION EXAMPLE:

For some background, at least two sportsbooks that are licensed in other jurisdictions do voluntarily send out notices around restricting accounts. For example, the Bet365 standard email template reads:

"Following a review of your account by our Trading team, we regret to inform you that whilst our online service remains available to you, wagering restrictions will be applied on any future bets placed and the Cash Out feature is no longer available to you.

Should you wish to continue to use our services, you will no longer be eligible for selected Sports offers and promotions.

This does not affect any bets you have already placed in accordance with any offers.

You can view a full list of your available Sports offers by logging in and selecting Offers or Promotions."

Our trading manager could interpret that the above email would be very close to meeting the proposed regulation standard if voted through as-is, which requires three core elements: timely notice, specific explanation & newly-limited market(s).

1) "Timely notice" is undefined so even if we send the patron this email within a week of our restriction, that could be considered timely

2) We could add to the above template that our Trading team has observed "play against our Terms of Service" or "advantage play" to satisfy the specific explanation requirement

3) By notifying the patron that they are limited on "any" or "all" future sports wagers, that satisfies identification as to which market(s) are so limited

The above email satisfies the letter, but not the spirit, of the law and does little to achieve the Commission's goal which is transparency to patrons.

DISCUSSION:

For this regulation to bring true transparency and value, all three of the core elements need to be defined in additional subsections: "timely notice", "specific explanation", and "market(s)." The regulation also needs a 4th prong which is "retroactive application."

Caveat: If a notification-only regulation is too effective, our trading team would likely not use limiting to manage risk as much and instead modify our system to offer worse prices and add significant manual review time to discourage wagers from those patrons. Without a supplementary blanket rule forbidding such things, this regulation may have unintended consequences.

1) Retroactive application (one-time disclosure requirement for past actions taken):

This is intended so that all patrons are served equally, not just the next generation of patrons. One of the common complaints of this proposed regulation is that it does not bring transparency for those who have already been limited and they remain in the dark. Most patrons who would qualify as advantage players have already created accounts at the onset of state legalization and, three years out, have already been limited, perhaps down to 1% in some or many cases.

This protects patrons from 11th hour limit-setting prior to regulation effective date. Without a retroactive requirement, there is a significant risk of 'pre-emptive limiting' where operators may drastically restrict profiled accounts prior to the effective date to bypass the new disclosure requirements. This creates a two-tiered system of protection that excludes the very patrons most impacted by this practice. This would be an unintended consequence of this regulation becoming law.

When Illinois passed a law taxing sports betting operators on a per-wager basis, it did not expect that the companies would prepare & implement fees in their apps. When sports betting advertising was banned in some countries, those countries did not anticipate record spending on advertising in the months leading up to the ban's effective date.

This prong also provides a foundation for a complete dataset and future research. The Commission could track how many emails are sent in the initial implementation of the regulation and compare against the Commission's database of limited accounts. If the Commission does modify the regulation to require more detailed information in the email (for example, the patron's Closing Line Value), that data can also be collected and analyzed. Patrons will also be able to share their emails publicly and the Commission could learn from that public discourse as it already has. If these emails are to be part of the SW quarterly reviews, seeing that public discourse ahead of time could help inform questions.

2) Timely notice:

This should be within 24-48 hours of the limiting action taken, if possible. If undefined and left up to the operator, the patron would likely "learn the hard way" as they try to place their next wager following the action by our trading team. The time it will take between trading team action -> compliance -> email being sent will almost certainly take longer than the time it will take for that patron to place their next wager and find out firsthand.

A key element of "timely notice" should be a requirement to disclose the wager or set of wagers placed that led to the trading team action along with the closing line value of each wager. This also acts as a

time reference by which the patron can determine whether they did in fact receive the email within a timeframe required by the statute.

Specific explanation:

The wager(s) being listed transparently in the email will help both the consumer and regulators. A likely outcome of this is that the Commission will receive some patron complaints with the forwarded email notice. In some cases, patrons will also share that online on social media. The Commission has the benefit of accessing public tools like odds histories or injury notifications to get a better understanding of why the limiting action was taken independent of the communication from the sportsbook.

There is an inherent incentive for operators to provide the broadest possible definitions for restrictions to avoid 'tipping off' sophisticated players. However, without a standardized list of prohibited behaviors, 'specific explanation' becomes a subjective exercise that fails to provide the patron with actionable information or the Commission with measurable data. But that needs to be a part of the Specific explanation.

Right now, the only way to know what the unwritten rules of sportsbooks are is to stumble on the population of people who have run afoul of those rules and spread them via word of mouth. These unwritten rules are the basis for limiting but every sportsbook has their own risk management and tolerance, none of which is transparent.

It is generally accepted consumer behavior to use a price comparison tool to find the vendor that offers the best price for a good or service. But if you do that too many times at our sportsbook, your account will be limited. The price doesn't even have to be considered an error. The fact that a patron is mostly betting with us when our price is the best in the market makes them an "advantage player."

The current lack of definition creates a double standard. For instance, 'live betting' and 'group wagering' are often encouraged through marketing (e.g., stadium-focused promotions or 'share-a-bet' features), yet these same behaviors are frequently cited as grounds for account restrictions when the patron is successful. Standardizing definitions ensures that 'fundamental fairness' applies to both our marketing and trading desks.

Our trading manager complains about courtsiders at games but when Missouri launched sports betting recently, GeoComply touted that there were 10,000 active accounts in and around Arrowhead Stadium during the Chiefs-Texans game. We were happy to take bets from those seats as long as they appeared to not know what they were doing.

A sportsbook promoted for Thanksgiving a "Pass-the-Leg" group betting promo where friends and family could piece together a parlay across multiple accounts and all wager on the parlay together. If that group knows that they are doing, we would brand them a syndicate.

The rules are wholly unclear by design and our sportsbook, along with others, are unaccountable in that regard.

This regulation should educate the patron on exactly what they did wrong and could help prevent them from doing it with another licensed sportsbook. A goal for the Commission should be that the patron learns from that mistake or wrongdoing and doesn't do it at other licensed sportsbooks.

"Specific explanation" should be defined as an explanation that comes directly from a Commission-approved list of rules or behaviors located in the House Rules that could result in a patron account being limited. That explanation would be backed by the wager(s) in question. The Commission would be able to collect data that says 5% of the patrons were limited for reason A, 7% were limited for reason B, 42% were limited for reason C, etc.

List of Market(s) limited:

Our trading team is unlikely to profile a patron who beats us on NBA prop wagers and limit them only on NBA prop wagers because that patron has demonstrated that they are likely not long-term profitable to us. If they can find an edge in one spot, they are capable of doing it again elsewhere in the catalog. So we would limit them across the entire sportsbook catalog. We would limit them harder on derivative markets like props than primary markets such as moneylines, totals and spreads. We may also stake-factor them multiple times over, each time resulting in lower limits.

We could send a patron an email three separate times that notifies them that we have limited them on NBA props with the same exact language each time. That would just confuse or more likely frustrate the patron.

The Commission may find a sportsbook notice to the patron that reads, "Your maximum risk wager amount has been limited to 50% of a new user's maximum on all NBA prop markets." would be sufficiently transparent and informative for the patron. And the subsequent limiting emails may say 25% and then 10%, for example. This is more data for the commission.

Any approach here will be flawed, however, because limits are applied across the sportsbook at varying levels. So even the above does not inform the patron that we also limited them to 75% on NFL main lines (lower risk markets), 1% on NCAA womens basketball markets (highest risk markets), etc. The above would still provide another valuable piece of information to the patron and to the public discourse.

To truly meet the requirement of 'identifying limited markets,' the Commission should mandate a standardized digital disclosure. A patron-specific summary in a secure link or CSV file detailing limit percentages by market type would provide the data necessary for the Commission to audit whether limits are being applied proportionally or punitively.

Keep in mind that this advice should be considered as a package. For example, if this regulation is expanded and made to be more difficult for the sportsbooks without retroactive application, this would likely result in a sportsbook like ours limiting patrons at the 11th hour.

Some commissioners have remarked that "fundamental fairness" is an area that the Commission wants to address in the future as part of this ongoing discussion. This regulation should be written in such a detailed way that helps inform and provide data to that end.

The data that the Commission should want to analyze from these emails is whether the limits applied seem appropriate and proportional based on the behavior alleged by the sportsbook listed in the house rules, and based on the evidence of the actual wagers placed.

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Monday, January 5, 2026 8:33:34 AM

Submitted By

Citizen

Name

Shlomo Graber

Email

sygraber16@gmail.com

Regulation

205 CMR 238.30: Acceptance of Sports Wagers

Comments

The word "specific" in this regulation does a lot of heavy lifting. I have received "explanations" consisting of "due to a business decision", "due to a decision by our trading team", etc. It would be an enormous leap of faith by the commission to assume that, in the absence of more precise guidance, operators will not stretch the meaning of "specific explanation" to continue offering vague and useless explanations.

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Thursday, December 25, 2025 1:05:18 PM

Submitted By

Citizen

Name

Frank Giordano

Email

f.giordano@comcast.net

Regulation

Limits on sports wagers

Comments

The outrageously low limits imposed by sportsbook operators are both punitive and discriminatory. To allow a customer to deposit hundreds of thousands of dollars into their wagering account and then limit them to only 60 cents per game should absolutely be considered illegal. A fair limit would be \$50 per wager on each category. The sportsbooks would still earn enormous profits. The unfair rules imposed by these trillionaire corporations are not beneficial to the hardworking taxpayers of Massachusetts

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Wednesday, December 24, 2025 9:36:48 AM

Submitted By

Citizen

Name

Daniel Bernues

Email

dbernues@icloud.com

Regulation

205 CMR 238.30: Acceptance of Sports Wagers

Comments

Regulation should also include some language about when a player can be limited and not just allow the sportsbook to do so for any reason. Players should not be limited just because they are more skilled than the sportsbook. It is unfair and completely one-sided to kick out the winners and keep only the losers. If the player is cheating in some way (like fixing a match) then sure, that is unfair to the sportsbook. But if all the player is doing is accepting the odds that the sportsbook provides, and the player is good at doing so, why should he be limited for simply being better at the game? The sportsbooks already bake an advantage into the odds that they provide (e.g -110/-110 odds is a 4.76% advantage), so for a player to be able to overcome it, should not be punished.

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Wednesday, December 24, 2025 5:48:24 AM

Submitted By

Citizen

Name

Frank Giordano

Email

f.giordano@comcast.net

Regulation

Sports wagers limited

Comments

It should absolutely be illegal for sportsbooks to — allow me to deposit money into my Sportsbook account (let's say \$1000), and then unknowingly be limited to pennies per game, and then have to wait 48 hours to withdraw my money. THAT SHOULD ABSOLUTELY BE ILLEGAL! I want to know before I make a deposit or a wager, exactly how much I am allowed to bet on each individual offering. That is the LEAST these corrupt sportsbooks can do - limiting should be illegal anyway, it is unjust, predatory and discriminatory.

From: [MGC Website](#)
To: [Young, Judith](#)
Subject: Regulations Public Comment Submission
Date: Tuesday, December 23, 2025 7:59:05 PM

Submitted By

Citizen

Name

Michael Sullender

Email

sullender@gmail.com

Regulation

CMR 238-30

Comments

Sportsbooks constantly limit me from playing. Not for winning (many I have actually LOST money) but because I don't do parlays or what they consider stupid bets. If you bet 3 days before a game or only play sides they limit you. Sometimes within a few days of opening the account. And god forbid you actually win. You will be limited from \$1000-\$2000 a game to \$2-3. It's ridiculous. Meanwhile my college aged son bets nothing but stupid longshot parlays and gets constant offers and solicitations from the books and they let him bet whatever he wants. I have millions of dollars and I can't bet \$50 on a game and my son has \$200 to his name and they are cleaning him out. Someone HAS to do something about this. Not only full disclosure but letting all of us limited players play again. Everyone should have equal opportunity. It's like having a bar where only problem drinkers are served.

From: [Michael Grzebieniowski](#)
To: [Stempeck, Justin](#)
Subject: Fw: Sportsbook Limiting
Date: Thursday, December 18, 2025 1:21:36 PM

You don't often get email from mgrzeb@yahoo.com. [Learn why this is important](#)

Hi Justin,

I appreciate the Mass Gaming Commission's discussions about sports gambling and limiting. I don't feel as if anything tangible has been accomplished, but at least this is being acknowledged and heading in the right direction.

Moving forward the books have to provide a reason they are limiting someone. What is that really doing? Those that are limited know why, because they win. Something needs to be done to stop the practice of limiting. If I win or lose the Commonwealth receives tax revenue. If I can't place a bet, or a maximum bet for \$1.53, you're receiving pennies. Prohibiting limiting is in the Commonwealth's best interest.

There should be bet minimums. At casinos there are table minimums and maximums, why not for sports gambling? The books are lazy and would prefer to ban bettors than adjust their lines and learn from their mistakes. I don't know the right number, but isn't it reasonable to have a \$100 minimum on anything they offer?

It's called gambling, by letting people think they can win, but when they do, you're banned. If I was a loser they would give me VIP status, endless promos and no minimums. Now that's predatory.

Best,

Michael Grzebieniowski

[Yahoo Mail: Search, Organize, Conquer](#)

----- Forwarded Message -----

From: "Michael Grzebieniowski" <mgrzeb@yahoo.com>
To: "justin.stempeck@massgaming.gov" <justin.stempeck@massgaming.gov>
Sent: Wed, Dec 10, 2025 at 3:36 PM
Subject: Sportsbook Limiting

Hi Justin,

I saw that the MGC is set to discuss sportsbook limiting next week.

Is there anything I can do to help?

I'm a winning bettor that has been severely limited on all seven books in the Commonwealth.

I'm regularly limited to under \$5 on Draftkings, Bet MGM and Bally Bet. I'm regularly limited to \$10 on The Score, Caesars and Fanatics.

I have done nothing wrong, except win. I itemize and pay taxes providing revenue for Massachusetts. This is not my full time job, I found it as a hobby and follow all rules. I don't have employees, others place bets for me and don't gamble offshore. I'm just a regular guy that found an edge.

The only people they let bet are the losers, which is predatory. Why is all the risk on the consumer? Allowing books to limit customers is fixing the game.

This may be a moot point if the new tax law from the Big Beautiful Bill doesn't get reversed. If I can only offset 90% of my losses I won't be gambling anymore and I know many others feel the same.

Please let me know if I can assist in any way.

Best,

Michael Grzebieniowski

[Yahoo Mail: Search, Organize, Conquer](#)



Legal Division

AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended small business impact statement in accordance with G.L. c.30A §5, relative to the proposed amendment to **205 CMR 238.00: *Additional uniform standards of accounting procedures and internal controls for sports wagering***, specifically, **205 CMR 238.30: *Acceptance of Sports Wagers***; for which a public hearing was held on February 10, 2026. The amendment was developed as part of the process of promulgating regulations governing sports wagering in the Commonwealth.

This regulation governs the process surrounding the acceptance of sports wagers from patrons and the internal controls required. Accordingly, the proposed regulation amendment is unlikely to have an impact on small businesses. The regulation amendment is authorized by M.G.L. c. 23N § 4.

In accordance with G.L. c. 30A §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

Presently, there are no less stringent compliance or reporting requirements for small businesses. There are no small businesses that the Commission anticipates will be impacted by the amendment.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

The proposed regulation does not impose any reporting requirements for small businesses.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

The regulation does not impose any consolidating or simplifying compliance or reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed legislation:

As a general matter, the proposed amendment requires design standards that ensure uniformity.



Massachusetts Gaming Commission

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The regulation is unlikely to deter or encourage the formation of new businesses in the Commonwealth currently.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

The amendment is unlikely to create any adverse impact on small businesses as it would apply only to the sports wagering operator's internal controls that govern the acceptance of sports wagers from patrons.

Massachusetts Gaming Commission

By:

/s/ Justin Stempeck

Justin Stempeck

Chief Deputy General Counsel

Legal Division

Dated: February 26, 2026



Massachusetts Gaming Commission



TO: Chair Maynard, Commissioners O'Brien, Hill, Skinner, and Brodeur

FROM: Mark Vander Linden, Director of Research and Responsible Gaming;
Carrie Torrisi, Chief of Sports Wagering Division

CC: Dean Serpa, Executive Director

DATE: February 26, 2026

RE: Evidence-Informed Support to Guide Massachusetts Gaming Commission Decisions on VIP Programs

Background

Loyalty programs are marketing strategies to promote continued patronage by providing rewards based on the amount spent. Customers spending the most, “high-value customers”, are generally assigned to the highest reward tier, or VIP program. The evidence assessing harms linked specifically to membership in VIP programs is limited. However, given that gambling frequently and spending substantial amounts on gambling are associated with increased risks of gambling harm, it follows that loyalty and VIP programs would be associated with higher-risk gambling behavior.

During a Commission meeting on October 9, 2025, we provided an overview of gambling-related VIP programs and specific information related to Massachusetts operators. Based on feedback from Commissioners, we engaged with the UK Gambling Commission (UKGC) to understand the development of its VIP-related rules to protect high-value customers. Following consultation with representatives of the UKGC, we recommend the following approach to guide the MGC's decision making regarding VIP programs.

Approach

Seek operator-led proposals

Following a model used by the UKGC, the Commission may consider leveraging insights and recommendations from MGC licensed sports wagering operators when considering policies or regulatory action to protect players and mitigate harms experienced by high value customers. Specifically, over the course of a few months, the UKGC invited operators to propose meaningful standards for VIP program delivery. The process for operator engagement was coordinated by UKGC staff. The final guidance issued by the UKGC related to high value customers is attached.

Synthesize the evidence

As part of the MGC's FY26 research agenda, the Commission approved a study on VIP programs, including program structures and operational models, impacts on player behavior and risk and



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implications for at-risk or vulnerable populations. To support this process of deepening understanding of VIP program structures, MGC provided funding to Greo to create an evidence brief to:

- Synthesize evidence on VIP programs, including structures, impacts, and risk mechanisms;
- Examine approaches taken in other jurisdictions, with particular attention to the UK and other relevant regulatory environments;
- Incorporate lived and living and practice-based experience evidence to ground policy discussions in real-world contexts; and
- Explore insights from adjacent “commodities of risk” (e.g., alcohol, tobacco, digital platforms), where relevant to VIP-style incentive models.

By considering proposals from operators alongside the latest evidence, the commission will be better positioned to develop policies and regulatory approaches to mitigate harm related to VIP programs.



Massachusetts Gaming Commission

High Value Customers: Industry Guidance

September 2020

1 Introduction

How to use this guidance

- 1.1** This document provides guidance for licensees in relation to social responsibility code provision (SRCP) 5.1.1 on rewards and bonuses for high value customers (HVCs), also known as 'VIPs'. It is designed to help licensees assess whether they can provide HVC schemes with the necessary safeguards as set out in SRCP 5.1.1(2), which provides that:

Social responsibility code provision 5.1.1
Rewards and bonuses – SR code

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences

2. If a licensee makes available incentives or reward schemes for customers, designated by the licensee as 'high value', 'VIP' or equivalent, they must be offered in a manner which is consistent with the licensing objectives.

Licensees must take into account the Commission's guidance on high value customer incentives.

- 1.2** SRCP 5.1.1(2) places responsibility on licensees to assess the risks of incentivising HVCs. This guidance sets out the minimum standards we expect licensees to adopt and evidence in policies, procedures, and practices to mitigate those risks. Licensees will need to be able to explain the reasons for any departures from these standards and evidence how alternative approaches are equally effective at preventing outcomes contrary to the licensing objectives. Where a licensee cannot meet these minimum expectations, they should not be operating HVC incentive schemes.
- 1.3** Licensees are required to apply player protection controls, affordability checks, and due diligence consistently to all customers at appropriate stages of the customer relationship, or in response to specific concerns. This guidance supplements existing requirements related to customer protection, the prevention of crime or fair and open gambling. In particular, it supplements guidance for licensees on how to meet their customer interaction requirements. It does not supersede existing requirements but sets out the minimum standard that must be met to achieve the intended outcomes for HVC schemes. Licensees should seek independent legal advice where further clarity is required.
- 1.4** To minimise duplication, section 3 of this guidance is used to signpost licensees to relevant material, most notably the customer interaction guidance, which covers themes such as affordability, vulnerability and evaluation.

Scope of this guidance

- 1.5** There is no single definition of what constitutes an HVC. The categorisation and management of HVCs is determined by a licensee's business model and is relative to their overall customer base.
- 1.6** This guidance covers those customers identified as being of enough commercial value to warrant enhanced customer service unavailable to the wider customer base. Specifically, schemes that offer tailored or personalised incentives linked to high value spend or frequency of play. Such treatment may include but is not restricted to:
- i. Invitation to hospitality, events, dinners, or other enhanced services
 - ii. Personal account management/dedicated point of contact with the licensee
 - iii. Individualised bonuses, benefits, or gifts.
- 1.7** This guidance is not intended to capture ad hoc, non-personalised bonus offers or promotions that are made available to large numbers of consumers. High value prizes linked to promotions such as customer free prize draws are also not considered in scope where they are made available to the wider consumer base. Whilst this guidance does not provide a single specific definition of HVCs, we would expect a licensee to be able to provide a clear explanation of how HVCs are defined in their business and how this guidance has been applied.
- 1.8** This guidance may be amended periodically to take account of emerging good practice or regulatory changes. Minor amendments will be consulted on informally, for example, through industry trade bodies, with more substantive changes subject to public consultation.

2 High Value Customer Reward Programmes

Know Your Customer – assessing and mitigating risk

- 2.1** The management and incentivisation of HVCs poses two headline regulatory challenges:
- i. HVCs are more heavily engaged gamblers by spend, frequency or both. Heavily engaged gamblers are at greater risk of gambling related harm.
 - ii. The disproportionate financial value of HVCs leaves licensees vulnerable to the accusation they are placing commercial objectives over regulatory compliance.
- 2.2** Licensees should be taking steps to ensure all customers are gambling with money they can afford to lose (lawfully acquired disposable income) and without experiencing harm. For the general customer base, this assessment requires a risk-based approach often with the use of thresholds or triggers to alert licensees to the need for additional customer checks.
- 2.3** HVCs pose a heightened risk due to their high levels of engagement by frequency, spend, or both. For a licensee to accept and incentivise an HVC's custom they need to demonstrate how they have assessed and mitigated that heightened risk at the outset of the customer relationship and on an ongoing basis.
- 2.4** As a minimum, we would expect a licensee to be able to evidence that the following checks are undertaken before making any customer an HVC:
- i. **Affordability** – to establish that spending is affordable and sustainable as part of the customer's leisure spend

- ii. **Safer gambling** – to assess whether there is evidence of gambling related harm, or heightened risk linked to vulnerability
- iii. **Enhanced due diligence** – to ensure the licensee has up to date evidence relating to identity, occupation and source of funds.

- 2.5** It is important that customer checks are undertaken in a thorough and objective manner. Source of funds checks should provide clarification over the actual source of the funds used to gamble rather than an open source assessment of potential income/wealth. There should be appropriate separation between those with responsibility for customer checks and those managing the day-to-day relationships and incentivisation of HVCs.
- 2.6** In verifying a prospective HVC's affordability, licensees should be cautious when considering funds derived from an unplanned financial windfall from gambling or other sources, such as redundancy or inheritance. It is important that licensees can demonstrate that they have considered the sustainability of a customer's leisure spend, not just their access to immediate funding.
- 2.7** Statistics which estimate the numbers of problem and 'moderate risk' gamblers are published regularly, based on the combined health surveys in England, Scotland, and Wales (NatCen 2018). In assessing the risk of gambling related harm, we expect licensees to take account of available research including the latest data on demographic groups who over-index for at-risk or problem gambling rates, for example, 18-34-year-old males.
- 2.8** Subject to their assessment of risk, licensees should consider whether additional specific controls should be applied to an HVC's activity, either in consultation with the customer or imposed by the licensee on a precautionary basis. This is to mitigate the risk to the consumer; failure to do so would put the operating and personal licences at risk. Such controls can be reviewed as appropriate provided decisions are documented and subject to sign-off by a senior executive or equivalent in accordance with the licensee's governance arrangements.
- 2.9** Licensees should take reasonable steps to check whether a customer has previously self-excluded. Where an individual has previously self-excluded, this should be a significant factor in the licensee's safer gambling check. The circumstances in which it would be appropriate to incentivise a previous self-excluder as a HVC are limited. We expect the accountable PML holder or equivalent (see paragraph 2.16) to review the associated risk and sign-off on any decision to provide future access to HVC schemes or HVC incentives. This audit trail should include the steps taken by the licensee to mitigate the risk of harm which as a minimum should include the imposition of mandatory deposit/spend limits.
- 2.10** At a minimum, licensees should consider the following types of vulnerability, as set out in the customer interaction guidance, as part of any safer gambling assessment criteria:
- i. **Personal** - would include where an individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from injury, medication or addiction.
 - ii. **Situational** - would include where an individual is experiencing financial difficulties, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.
 - iii. **Behavioural** - would include where an individual has a higher than standard level of trust or high appetite for risk.
- 2.11** We expect licensees to take all reasonable steps to verify the information provided to them and conduct ongoing checks. The frequency of such checks should be determined by the assessment of risk from ongoing monitoring of the customer's activity, behaviour and

circumstances. In the absence of any change in the risk assessment, licensees should as a minimum undertake a review of an HVC's account at least quarterly.

- 2.12** Where an HVC fails any of the above checks, their HVC status should be suspended immediately until the licensee has addressed the risk identified in line with the relevant regulatory or legal requirements. This could include undertaking a customer interaction, seeking additional assurance, applying limits on the customer's account, submitting a suspicious activity report (SAR), or discontinuing the customer relationship.
- 2.13** Where a customer is unable or unwilling to provide the information required, they should not be considered eligible for HVC incentives and licensees should consider the regulatory risk posed by continuing the customer relationship.

Oversight and accountability

- 2.14** HVCs provide disproportionate revenue to licensees when compared with the wider customer base. This presents a risk of commercial motivations conflicting with regulatory compliance.
- 2.15** To mitigate this risk, it is important for licensees to have implemented effective policies and procedures for the operation and governance of their HVC schemes. This should include authority levels for key decision making, and appropriate oversight arrangements. No customer contact should be conducted outside the licensee's policies, procedures or systems.
- 2.16** Each rewards programme should have a named individual, at senior executive level or equivalent, accountable for the programme's compliance. For all licensees (except small-scale operators), we would expect this individual to be a personal management licence holder. Board or Executive committees should be responsible for overseeing the appropriate governance arrangements for HVC schemes and keeping these under review.
- 2.17** A full audit trail should be maintained detailing the management of individual HVCs, including:
- i. notable events with HVCs at all stages of the customer relationship to monitor changes in behavioural and transactional activity. This should include instances where the licensee has attempted to make contact with the customer but received no response and;
 - ii. a record of decisions made and all customer contacts irrespective of channel, with details kept in line with the licensee's data retention policy.
- 2.18** Where a current HVC has previously been part of a self-exclusion scheme, licensees should ensure the audit trail includes details of why their inclusion in the HVC scheme is considered appropriate and the reasonable steps taken by the licensee to mitigate the risk of harm.
- 2.19** Any review of an HVC's activity should include all accounts the individual has with the licensee or related group licensees irrespective of brand and sector.¹
- 2.20** Audit or assurance functions should be used where appropriate to ensure objective assessments can be made of whether HVC schemes are operating in accordance with the licensing objectives.

¹ Remote licensees are subject to existing requirements in relation to SRCP 3.9.1 *Identification of individual customers*

Relationship management

- 2.21** Licensees should consider what additional steps are required to ensure staff are equipped and motivated to manage HVCs effectively, including:
- i. enhanced training on safer gambling and AML risks specific to HVC management. Training should be formally recorded and refreshed regularly, and staff should be appraised on their safer gambling actions.
 - ii. job descriptions reflecting that protection of the licensing objectives are the basis for all activity carried out by staff involved with HVC schemes.
 - iii. staff should not be incentivised or remunerated based on a customer's loss, spend, or activity.
 - iii. the performance management of HVC staff should be consistent with the principle that commercial pressures must never override regulatory considerations or customer welfare.
 - iv. ensuring staff managing multiple accounts retain their ability to assess risk on an individual basis.
 - v. staff are empowered to escalate regulatory concerns relating to HVCs.
- 2.22** Customer contact should be conducted in a professional and transparent manner and where possible, colleagues that look after specific HVCs should be rotated to ensure objectivity in decision making is maintained.
- 2.23** All licensees are required to interact with HVCs in a way which minimises the risk of customers experiencing harms associated with gambling, as set out in SRCP 3.4.1 (on customer interaction) of the licence conditions and codes of practice (LCCP).
- 2.24** Having collected verified information regarding the HVCs affordability, licensees are well placed to target interactions more effectively where a customer's gambling activity is inconsistent with the information held.
- 2.25** Licensees must ensure arrangements between HVC teams and other teams (e.g. safer gambling and AML) are working collaboratively to allow for objective decision making and review, based on all available information.
- 2.26** Licensees should consider the risk of HVCs taking longer to access support through concern that may lead to the removal of their HVC status and rewards. To further protect HVCs, licensees should:
- i. provide regular and enhanced information on gambling management tools
 - ii. offer HVCs an active choice whether to set account limits
 - iii. make safer gambling resources available to HVCs at any appropriate point of contact
 - iv. promptly comply with HVC's requests to be removed from reward programmes and stop any personalised incentives immediately
 - v. regularly review the HVC's suitability for incentives
 - vi. take action to restrict or terminate personalised incentives if the HVC's spend or play exceeds their usual habits with no supporting explanation.

Use of incentives

- 2.27** HVC incentives should not be used to exploit vulnerable customers or to encourage problematic behaviour. Licensees must be able to evidence how their rewards and bonuses are compliant with the provisions in section 5.1 of the codes of practice.
- 2.28** We expect the accountable executive or equivalent to be able to demonstrate how they have assured themselves that:

- i. Incentivisation methods do not encourage risk behaviours such as chasing losses, excessive time or money spent gambling, or accelerating frequency of gambling.
- ii. The timing of incentives is not linked to periods of excessive play or significant losses, in proportion to the customer's affordability of spend.
- iii. Information held on individual HVC's habits and preferences is being used to inform responsible incentivisation which is only conducted alongside appropriate consumer protections.
- iv. Incentives are proportionate to a customer's spending pattern and consistent with the licensee's affordability and vulnerability assessment.
- v. Tiered or structured incentive schemes are not promoted to HVCs in a manner which results in individuals gambling excessively to obtain (or retain) a grade or status of HVC which is unsustainable.

2.29 Life events or changes to an individual customer's circumstances may mean that a person becomes more vulnerable to experiencing gambling harms. These changes may include bereavement, loss of income or financial windfall, or a breakdown of personal relationships. Further guidance on the factors that operators should consider are included in our customer interaction guidance.

2.30 We recognise that in some instances, customers may choose to withhold knowledge that could otherwise inform a licensee's decision to offer incentives. We accept that licensees can only be held to account for information they hold or could have reasonably obtained prior to making commercial decisions.

2.31 Given the personal service extended to HVCs, staff may become aware of risks associated with temporary or longstanding vulnerability. Licensees must ensure the actions and behaviour of staff does not exploit such vulnerabilities - either through the provision or characterisation of incentives, or by engaging in contact which goes beyond a professional level to become one of friend or confidant. In addition, the licensee should have processes in place outlining what action should be taken upon identifying specific vulnerabilities.

2.32 Licensees are responsible for the actions of affiliates with whom they contract for any provision of their HVC acquisition or management. They must ensure contractual provisions are in place to terminate agreements where appropriate.

3 Further Guidance

As outlined above, this guidance specifically concerns the provision of incentives to HVCs. In addition to this, all customers, including those considered to be high-value customers, are subject to the wider requirements of the LCCP for consumer protection. In particular, the following guidance is relevant:

Customer interaction

Further information on how to meet the [requirements for proactive interaction](#) can be found on our website.

Identity verification

Further information on [age and identity verification requirements](#) can be found on our website.

Anti-money laundering

Guidance on how to comply with [anti-money laundering responsibilities](#) can be found on our website.

Online markers of harm research

Further research on [online markers of harm](#) can be found on the GambleAware website.

September 2020

Keeping gambling fair and safe for all

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