

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



APPLICANT NAME: PointsBet Massachusetts LLC

Applicant: PointsBet Massachusetts LLC

INSTRUCTIONS

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

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General Information

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Non-Refundable Processing Fee

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

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

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

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

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

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Completing the Application

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

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

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

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

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

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Submission of Materials

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

How to Submit an MGC Sports Wagering Operator License Application

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

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

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

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

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

Electronic Application Format

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

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

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

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

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

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

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

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

C2-a-01 Revenue Projections CONFIDENTIAL.pdf

C2-b-01 Revenue Projections CONFIDENTIAL.xls

Application.pdf

Signed Application.pdf

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Public Records

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

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

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

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Checklist

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

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

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SECTION A: GENERAL INFORMATION

A.1 APPLICANT NAME

PointsBet Massachusetts LLC

Name

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

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

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

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

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

Delaware

State/Province

United States

Country

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

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

A.7 FEDERAL TAX ID NUMBER

[REDACTED]
Federal Tax ID Number

A.6 APPLICANT LOCATION INFORMATION

1331 17th St., Suite 900

Number and Street Address

Denver, CO 80202

City, State, & Zip Code

N/A

Phone Number

[REDACTED]
Email Address

PointsBet.com

Website

A.7 APPLICANT PRINCIPAL PLACE OF BUSINESS INFORMATION

1331 17th St., Suite 900

Number and Street Address

Denver, CO 80202

City, State, & Zip Code



Email Address

Applicant: PointsBet Massachusetts LLC

N/A

Phone Number

A.7 PRIMARY CONTACT FOR THIS APPLICATION

Andrew Moreno

Name



Email Address

Senior Director of Regulatory Operations & AML

Title



Phone Number

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

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

Provide a thorough description of the applicant's ability to offer sports wagering in the Commonwealth. This should include the following: Answered [Below](#)

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

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

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

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

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

Provide a thorough description of the sports wagering platform to be operated in the Commonwealth. This should include the following: Answered [Below](#)

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

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

Provide a thorough description of the applicant's expertise in sports wagering and how it would be applicable in the Commonwealth. This should include the following: Answered [Below](#)

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

SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following: Answered [Below](#)

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

C.2 PROJECTED REVENUE

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

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

Section Answered [Below](#)

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

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

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

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

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

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

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

Capital Investment

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

Please provide a thorough description, including the following: N/A

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

C.5 COMMUNITY ENGAGEMENT

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

Answered [Below](#)

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

SECTION D: DIVERSITY, EQUITY, & INCLUSION

D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

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

Provide a thorough description of the Applicant's overall and specific goals, applicable to the total dollar amount of contracts, for the utilization of: Answered [Below](#)

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

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

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

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

Provide a thorough description of the Applicant's commitment to diversity, equity, and inclusion initiatives in the Commonwealth. This should include: Answered [Below](#)

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

SECTION E: RESPONSIBLE GAMING

E.1 RESPONSIBLE GAMING POLICIES

Referencing the following documents:

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

Provide a proposed responsible gaming plan draft that, at a minimum, incorporates policies and tactics for the following key strategies: Answered [Below](#)

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

E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant's ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include: Answered [Below](#)

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

E.3 HISTORY OF DEMONSTRATED COMMITMENT

Provide a thorough description of the policies and procedures that the applicant has adopted to: Answered [Below](#)

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

SECTION F: TECHNOLOGY

F.1 GEOFENCING

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

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

F.2 KNOW YOUR CUSTOMER

Provide a thorough description of how the Applicant will ensure the verification of information provided by users opening a new account on the platform. Answered [Below](#)

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

F.3 TECHNOLOGICAL EXPERTISE AND RELIABILITY

Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items: Answered [Below](#)

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

SECTION G: SUITABILITY

G.1 SUITABILITY – CORPORATE INTEGRITY

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

- [Massachusetts Gaming Commission Business Entity Disclosure Form](#)
- a. Joint Venture Agreements for the implementation of a sports wagering operation:
 1. Other Applicants
 2. Businesses
 3. Contractors
 4. VendorsBusiness Entity Disclosures submitted through MGC Secure File Transfer Site

G.2 SUITABILITY - INDIVIDUAL QUALIFIER INTEGRITY

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

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

- [Massachusetts Gaming Commission Supplemental Form](#)

Individual Qualifiers information submitted through MGC
Secure File Transfer Site

G.3 FINANCIAL STABILITY & INTEGRITY

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

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

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever: Answered [Below](#)

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

Applicant: PointsBet Massachusetts, LLC

SIGNATURE FORMS

Applicant: PointsBet Massachusetts, LLC

VERIFICATION AND AUTHENTICATION

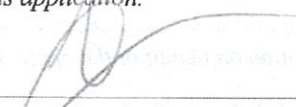
The applicant, PointsBet Massachusetts, LLC, hereby authorizes the Commission, the Executive Director of the Commission, the Investigations and Enforcement Bureau, and/or their respective designees to take all necessary and reasonable steps to verify and authenticate any information or materials submitted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

Johnny Aitken

Name of Authorized Individual

Chief Executive Officer, USA

Position with Applicant


Signature of Authorized Individual

11/10/2022

Date

Applicant: PointsBet Massachusetts, LLC

ATTESTATION

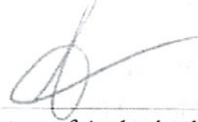
I, Johnny Aitken, on behalf of PointsBet Massachusetts, LLC hereby swear or affirm under the pains and penalties of perjury that the information contained in this Application form and all materials accompanying said form are true and accurate to the best of my knowledge and understanding; that I have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

Johnny Aitken

Name of Authorized Individual

Chief Executive Officer, USA

Position with Applicant



Signature of Authorized Individual

11/10/2022

Date

Applicant: PointsBet Massachusetts, LLC

WAIVER OF LIABILITY

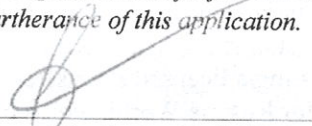
PointsBet Massachusetts, LLC hereby holds the Commonwealth of Massachusetts and its instrumentalities and agents, including but not limited to the Massachusetts Gaming Commission and its agents, representatives and employees harmless, both individually and collectively, from any and all claims of liability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

Johnny Aitken

Name of Authorized Individual

Chief Executive Officer, USA

Position with Applicant



Signature of Authorized Individual

11/10/2022

Date

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

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

a. Background in sports wagering

PointsBet is a corporate bookmaker listed on the Australian Securities Exchange with gaming licenses in Australia, the United States, and Canada. PointsBet has developed a scalable cloud-based wagering platform through which it offers its clients innovative sports wagering products, iGaming and advance deposit wagering on racing. To-date, PointsBet has successfully launched operations in Australia, Canada and 12 U.S States with anticipated imminent launches in Maryland and Ohio in the near future. In those jurisdictions, PointsBet has been successful in establishing itself as a market leading sportsbook which has driven strong business growth. In addition to operating a licensed PointsBet online sportsbook, in New York PointsBet is also the licensed platform provider for Resorts World, which offers online sports wagering under the brand name Resorts World Bet.

PointsBet has built an award-winning sports wagering platform and brand that will generate economic benefit for the Commonwealth of Massachusetts. PointsBet owns and operates its own in-house technology platform for sports wagering that has many unique and modern features that allow it to compete on a global scale with localized flexibility. PointsBet will deploy the same proprietary code base as adapted and tailored to meet specific and unique requirements for Massachusetts to ensure that the platform has the capability to be a market leader in the Commonwealth of Massachusetts.

A critical aspect of the PointsBet platform technology infrastructure is that it is a single technology stack that is flexible to cope with demand at a local level. Given this, it is appropriate to focus on the deployment of PointsBet's platform as a single piece of technology that is capable of many localized iterations. The platform is designed with this flexibility in mind and optimized for the current demands of mobile focused sports wagering while utilizing the Azure Cloud to power much of the core functionality. Where others may rely on third party technology and platforms to control their sports wagering offering, we have intentionally developed a sophisticated and custom-built platform to respond to regulatory requirements, consumer demands and the 24/7/365 nature of current mobile and internet-based sports wagering.

PointsBet has intentionally and astutely assembled some of the most credentialed talent in the global sports wagering industry. Recruiting and retaining the people and teams to execute on such a unique opportunity has been a point of emphasis from the founders of the business and continues today.

Given the technology-focused operation and the fast-paced nature of the industry, our intent to amass a formidable team has led to significant opportunities and the ability to capitalize. Proven leaders that have the aptitude and wagering acumen to thrive from launch to market maturity and beyond sets PointsBet apart.

Co-Founder and Group CEO of PointsBet, Sam Swanell, who has an impressive background and unparalleled cumulative expertise, leads the global business, having built, grown and operated sports wagering businesses in the past. Sam is hyper-focused on PointsBet's strategic growth and considered expansion, and in doing so displays his expertise within rapidly evolving and complex situations.

US CEO of PointsBet, Johnny Aitken, similarly, has a skillset that spans multiple operators and wagering markets. His ability to lead the North American activities of the PointsBet business since its entry into the US market has been and continues to be critical.

b. Experience and licensure in other jurisdictions with sports wagering



Below is a list of all jurisdictions PointsBet has applied for and been approved to operate sports wagering. PointsBet has not been denied by a regulatory body in any jurisdiction that it has applied for licensure.

Jurisdiction	Date of Platform Launch	Type of Licensure
Northern Territory, Australia	February 2016	License to Conduct Business of Sports BookMaker
New Jersey, USA	December 2018	Transactional Waiver (Extended)
Iowa, USA	August 2019	Advanced Deposit Sports Wagering License (retail)
Iowa, USA	November 2019	Advanced Deposit Sports Wagering License (online)
Indiana, USA	January 2020	Sports Wagering Vendor License
Colorado, USA	March 2020	Internet Sports Betting Operator License
Illinois, USA	July 2020	Management Service Provider License
Michigan, USA	December 2020	Sports Betting Supplier License
West Virginia, USA	May 2021	Sports Wagering Management Service Provider License
New York, USA	November 2021	Sports Betting Platform Provider License
Virginia, USA	November 2021	Sports Betting Supplier License
Pennsylvania, USA	January 2022	Sports Betting Platform Operator License
Ontario, Canada	April 2022	Licensed SportsBook
Kansas, USA	September 2022	Sports Wagering Provisional Certification
Louisiana, USA	September 2022	Sports Wagering Platform Provider License
Maryland, USA	September 2022	Sports Wagering Facility Operator License
Maryland, USA	Anticipated December 2022	Online Sports Wagering Operator License
Ohio, USA	Anticipated January 2023	Mobile Management Services Provider
Wyoming, USA		Online Sports Wagering License

c. Plans to offer the platform in coordination with other applicants or person

PointsBet owns and operates its own core sports wagering technology stack including its Player Account Management system and sports betting trading systems and does not plan to offer its sports wagering platform in the Commonwealth of Massachusetts in coordination with other applicants or persons.

d. Intention to limit participation in any allowable sports events

PointsBet intends to offer wagering on all available markets and competitions approved by the MGC. PointsBet will work with feed providers to create multiple redundancies to prevent prohibited content from reaching site,



with blocks at feed and website level. Additionally, PointsBet's trading compliance team works with traders to ensure only allowable sports events are available.

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

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

a. Description of the customer experience, including options, promotions, and offers

PointsBet has continuously upgraded and evolved its feature set since the platform first began accepting sports wagers. Given the entire product feature roadmap is wholly owned internally and is not dependent on third-party technology providers as is common in our industry, we have flexibility to design and execute ideas, innovations and upgrades that other competitors are not able to do. This functionality is a key reason why our customers keep returning to the platform and PointsBet is an award-winning platform.

PointsBet's mobile application is consistently rated in the Top 3 of independent gaming research firm Eilers & Krejciek's ("E&K") App-By-App testing results and analysis of 40 different operator's applications currently in the U.S. sports betting market. As of E&K's October 2022 analysis, PointsBet ranked 3rd behind FanDuel and DraftKings and above other national competitors such as Caesars, BetRivers and BetMGM, with E&K placing, amongst other things, an emphasis on the positive user experience of the platform. Per the report, "Few apps on the market today compete with PointsBet's fast speed, quick load times, and button feedback and response. Across the board, the UX and UI on PointsBet is on point."

In 2020, PointsBet was honored by eGaming Review (EGR) at the 2020 North America Awards as the Top Sports Betting Operator and Most Socially Responsible Operator, as well as the US Rising Star to Watch.

In May 2021, PointsBet was honored by EGR as the Top Sports Betting Operator at its EGR North America Awards 2021. The recognition follows PointsBet's notable exhibition of scale and growth, ability to innovate and differentiate, commitment to responsible gambling, quality of marketing, and quality of product.



Commentary from the judging panel regarding PointsBet's Top Sports Betting Operator recognition included:



“Good differential and growth”

“Really strong entry from one of the most impressive operators within the US”

“Very impressive words and deck - definitely one to watch in 2021 and beyond!”

In April 2022, for the third consecutive year, PointsBet was honored by EGR as the Top Sports Betting Operator at its EGR North America Awards 2022.

To illustrate a few of the key features of PointsBet’s award winning platform, some of the latest and most popular components of the platform are set-out below.

1. **PointsBetting** – a unique bet type, only available at PointsBet, that allows our customers to wager on an outcome and be rewarded for each point they are right (and vice versa for each point they are wrong). Being unique to PointsBet, this serves as a strong retention tool and a differentiator in a crowded space.
2. **Same Game Parlay** – This allows customers to wager on multiple outcomes within a single event, including a wider variety of player props. Same game parlays are an exciting and engaging way for customers to participate in and enjoy their betting experience.
3. **Live In-game Betting** – PointsBet uses its in-house modeling and algorithms through its acquisition of Banach Technology and the in-house systems (colloquially referred to internally as “OddsFactory”) to create wide range of in-play event markets. PointsBet’s live in-game betting has enabled new betting opportunities for customers through deep market offerings, player props, live same game parlays, and lightning markets. Live in-game betting creates the best customer experience through increased limits, low bet delays, high market uptimes and cashout opportunities. PointsBet launched these markets through OddsFactory in November 2021 for NFL games. Since then, NBA, NCAAAB, Soccer and MLB have successfully launched live in-game betting through OddsFactory. PointsBet intends to expand into more leagues with the OddsFactory system throughout next year and into the future to create a faster in-game betting experience for the customer.
4. **Cash Out (including Partial Cash Out)** – PointsBet offers the ability for customers to cash out their bets after bet placement (and prior to the bet settlement). The more unique feature is the ability for customers to select “Partial” cash out and keep a portion of the bet alive, while returning the rest to their account balance. This leads to constant engagement during live events and drives extra activity on the platform.
5. **Parlay Booster Tokens** – PointsBet provides two “tokens” to customers each day allowing customers the chance to receive extra “profit” on one parlay bet and one Single Game Parlay bet per day. This drives high perceived value to the customer and leads to repeat play days, and extra bets per play. This is unique to PointsBet and an area that will continue to expand.
6. **Rewards** – PointsBet offers a rewards program to customers, allowing them to earn Rewards points on every single bet. More points are earned for Parlays and PointsBetting bets and all rewards points can be redeemed for Free Bets, to be used immediately.
7. **Name-A-Bet** – PointsBet is the only sportsbook to allow customers the opportunity to request any bet type they might not find on site. The requests are automatically fed through to our Sports Analytics team who will build out eligible bets on site within 30 minutes and notify customers immediately. This builds a strong two-way communication avenue between customer and our sportsbook, allowing for the highest level of personalization.
8. **Platinum & Diamond Club** – PointsBet offers two invitation-only clubs for its highest echelon of loyal



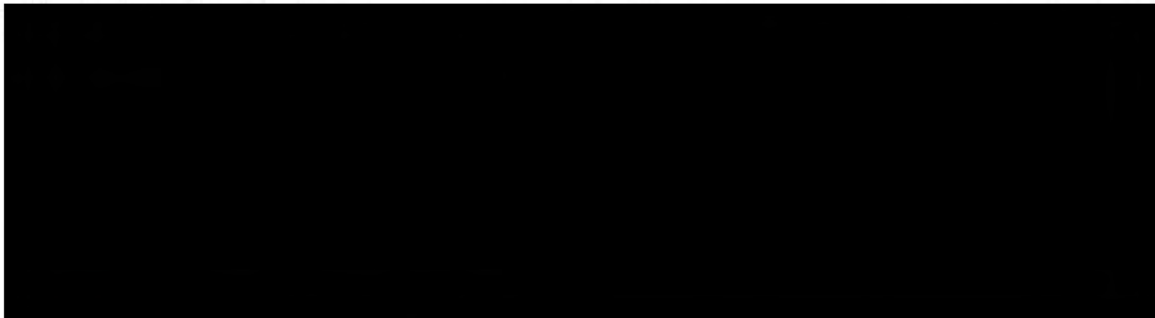
customers. Both clubs offer personalized promotions, concierge service, extra booster tokens, extra rewards points and can involve events/experiences as well as a 24/7 account manager.

b. Overview of wagering activity

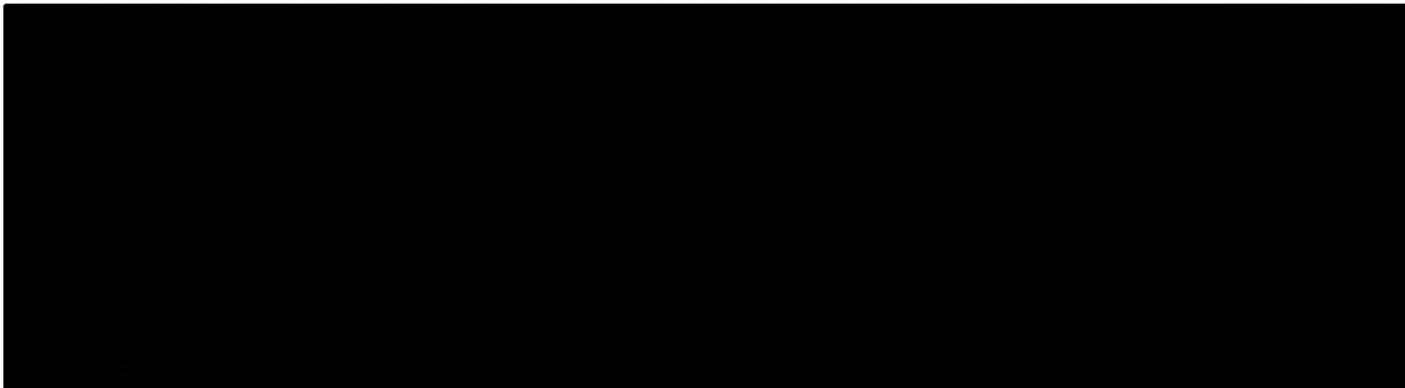
PointsBet ensures that it can offer its customers a wide array of betting options, from major domestic leagues, many of whom it has official league partnerships with, to other domestic and international competitions ranging from the Olympics to Australian Rules Football. A broad cross-section of sports and leagues ensures that the customers are accommodated with whatever their preference is or with whatever their favorite sports to bet on is. As certain sports or leagues continue to gain prominence or popularity, or new leagues are created, PointsBet expects to add these leagues to the wagering menu, subject to regulatory approval.

PointsBet offers more than 3,000 markets across hundreds of leagues including outrights, game props, team props, player props, awards, and PointsBet betting.

Wagering activity conducted through PointsBet's platform includes the following metrics:



c. Estimated volume of wagering activity



d. Jurisdictions where the platform is currently licensed and operating

As of the date of submission, PointsBet's Platform is currently licensed and operating in:

1. Colorado
2. Illinois
3. Indiana
4. Iowa
5. Kansas
6. Louisiana
7. Michigan



- 8. New Jersey
- 9. New York
- 10. Pennsylvania
- 11. Virginia
- 12. West Virginia
- 13. Ontario, Canada
- 14. Australia

At the time of this application PointsBet also has two anticipated imminent launches in Maryland and Ohio in the near future.

e. Current integration in use with other wagering operators

PointsBet is a standalone platform, with its own in-house technology. PointsBet is not reliant on integrations with other wagering operators and intends to use its own in-house technology in Massachusetts.

f. The number of user accounts maintained

The current number of active users maintained on PointsBet’s platform across Australia, Canada and the U.S. jurisdictions that PointsBet operates in is over ██████ users. Within the next two months, PointsBet has plans to launch operations in Maryland and Ohio. PointsBet looks forward to increasing the total accessible market available for new users if awarded a license to operate in Massachusetts.

g. Estimated market share within each jurisdiction

As set out in PointsBet’s FY 22 annual report for the financial year ending June, 30, 2022, the U.S. business blended market share stood at 3.7%. Please see extract below for further information:

POINTS BET UNITED STATES – ONLINE MARKET SHARE

BLENDING ONLINE HANDLE MARKET SHARE	ILLINOIS	NEW JERSEY	NEW YORK	MICHIGAN	COLORADO	PENNSYLVANIA	INDIANA	IOWA	VIRGINIA	WEST VIRGINIA
3.7% ¹	8.8% ²	2.6% ³	2.9% ⁴	2.6% ⁵	3.6% ⁶	2.4%	2.1% ⁷	2.5% ⁸	2.7% ⁹	1.6% ¹¹

- 1. Blended online handle market share is the sum of PB USA online handle divided by sum of active states online handle for Q4FY22.
- 2. Based on total Illinois online sports betting handle for Q4FY22 as reported by the Illinois Gaming Board.
- 3. Based on total New Jersey online sports betting handle for Q4FY22, as reported by the New Jersey Division of Gaming Enforcement.
- 4. Based on total New York sports betting handle for Q4FY22, as reported by the New York State Gaming Commission.
- 5. Based on total Michigan online sports betting handle for Q4FY22, as reported by the Michigan Gaming Control Board.
- 6. Based on total Colorado online sports betting handle for Q4FY22, as reported by the Colorado Department of Revenue - Division of Gaming.
- 7. Based on total Pennsylvania sports betting handle for Q4FY22, as reported by the Pennsylvania Gaming Control Board.
- 8. Based on total Indiana online sports betting handle for Q4FY22, as reported by the Indiana Gaming Commission.
- 9. Based on total Iowa online sports betting handle for Q4FY22, as reported by the Iowa Racing and Gaming Commission.
- 10. Based on total Virginia sports betting handle for Q4FY22, as reported by the Virginia Lottery.
- 11. Based on total West Virginia online sports betting handle for Q4FY22, as reported by the West Virginia Lottery.

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

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

a. Overview of technical standards, features, and operation of the platform



Sports Wagering System Descriptions/Introduction

As one of the few sports wagering operators that owns its own sports wagering technology stack, PointsBet is well placed to adapt the platform and conform with all necessary requirements for a successful and timely launch within the Commonwealth. PointsBet prides itself on its adaptability, feature offerings and user experience and continues to rank among the top operators in those categories. A description of the technical standards, features and operation of the platform planned to operate in Massachusetts is provided below.

The PointsBet's system is fully owned, operated, and developed by PointsBet itself. The PointsBet Sports Wagering Platform (Online), a Player Account Management (PAM) Platform, and iOS/Android Mobile applications are bespoke software and services developed to provide online sports betting, via both a web-based approach using any device or through a mobile application on a mobile device. When accessing PointsBet's Sportsbook through the applicable website on a computer, mobile device or similar device there is a verification process through a player location check service to ensure that the user is physically present within the eligible location.

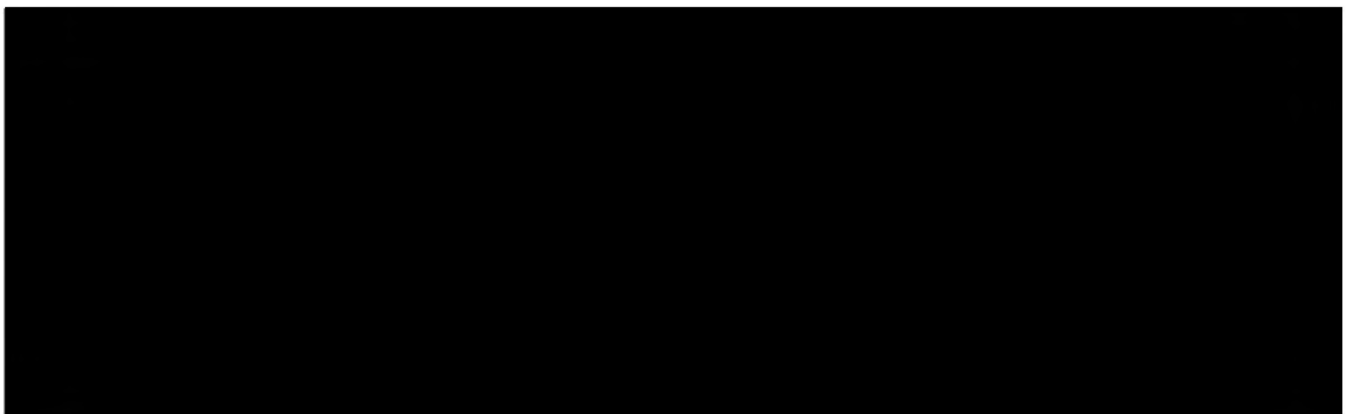
Only eligible wagers in the state which a customer is located are displayed. Events that have not received regulatory approval or which the results have already been determined cannot be wagered on. After a bet is placed, the customer's bet(s) and results can also be reviewed online in the customer's account.

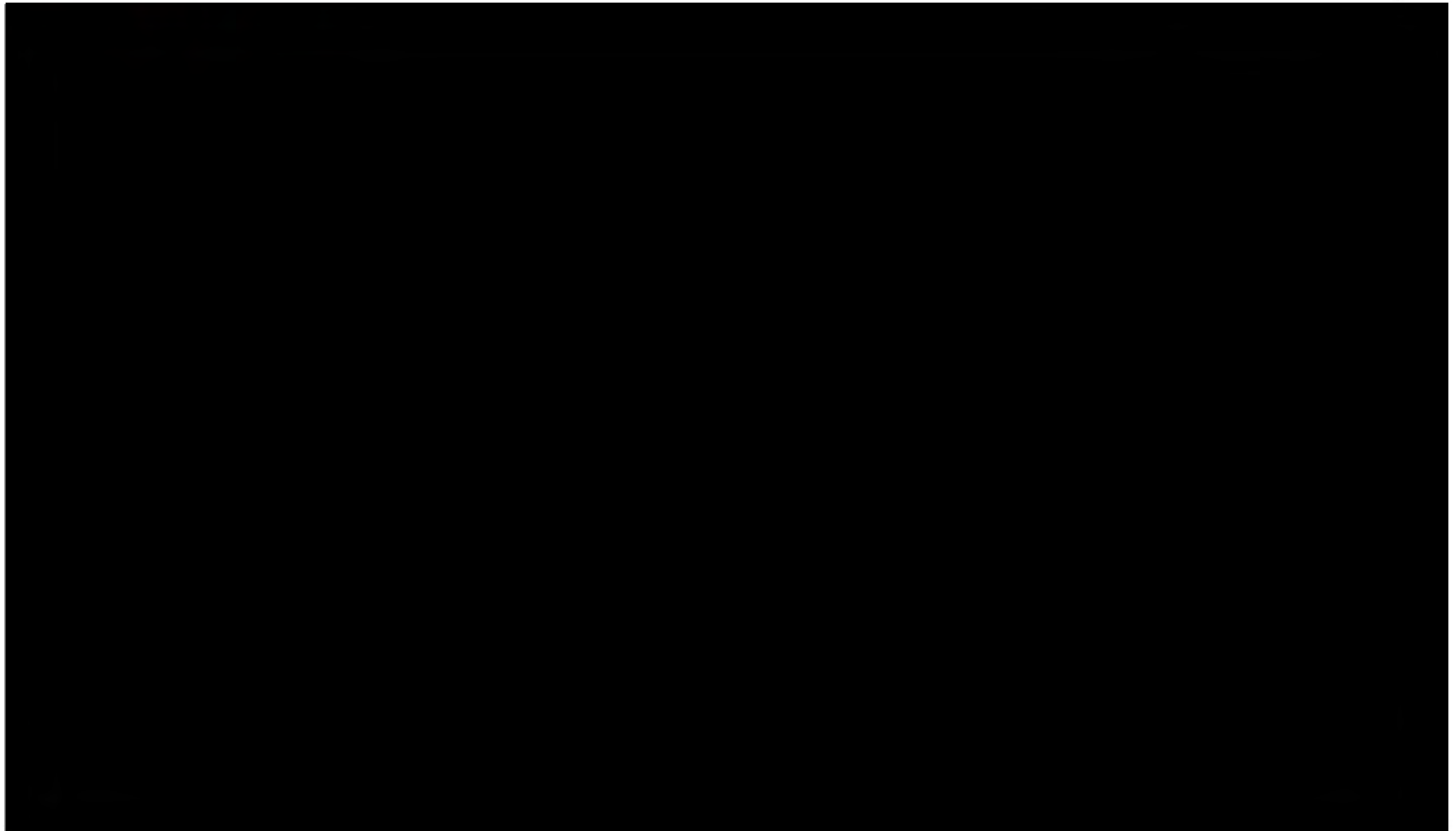
Once the results of an event are entered, confirmed, and settled, the customer receives payment for their winning wagers as reflected on their accounts. An electronic record of the wager and the associated outcome is also viewable in their account.

Bets placed but not yet settled may be cancelled in the back-office, by entering in a query to locate the bet and then performing a manual adjustment. After this adjustment is made, the wager amount is transferred back into the customer's account. If a market is cancelled, it immediately becomes unavailable for wagering.

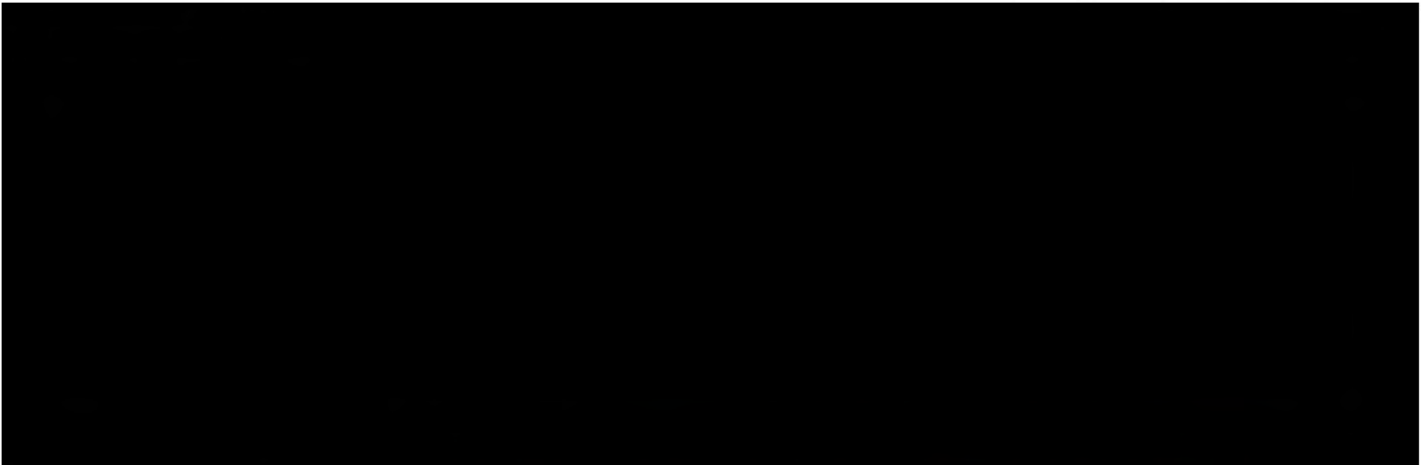
If bets have previously been placed on a market which is voided, then the customer is provided a refund of the amount wagered. After a market has been voided no additional bets are allowed on that market. A market may also be suspended/unsuspended at any time prior to the event start time. If a market is suspended it is no longer available for wagering. All market voids and suspensions must be performed using the back-office access.

PointsBet Platform:

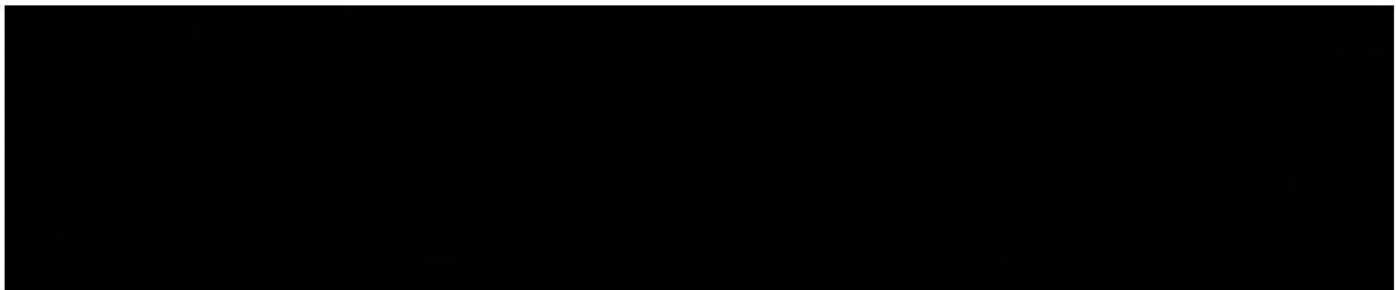


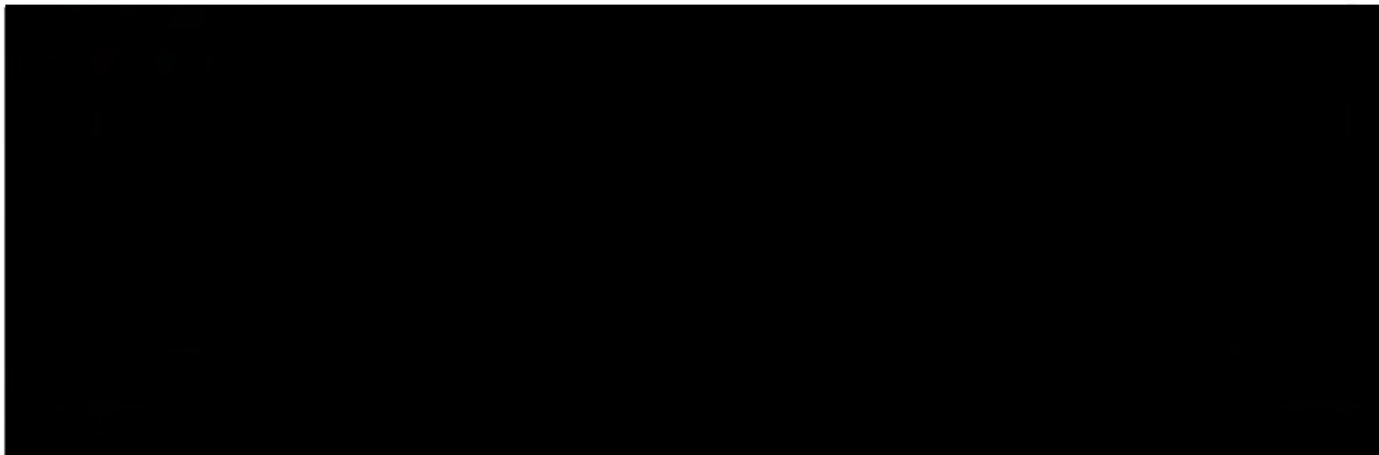


Operating System(s)

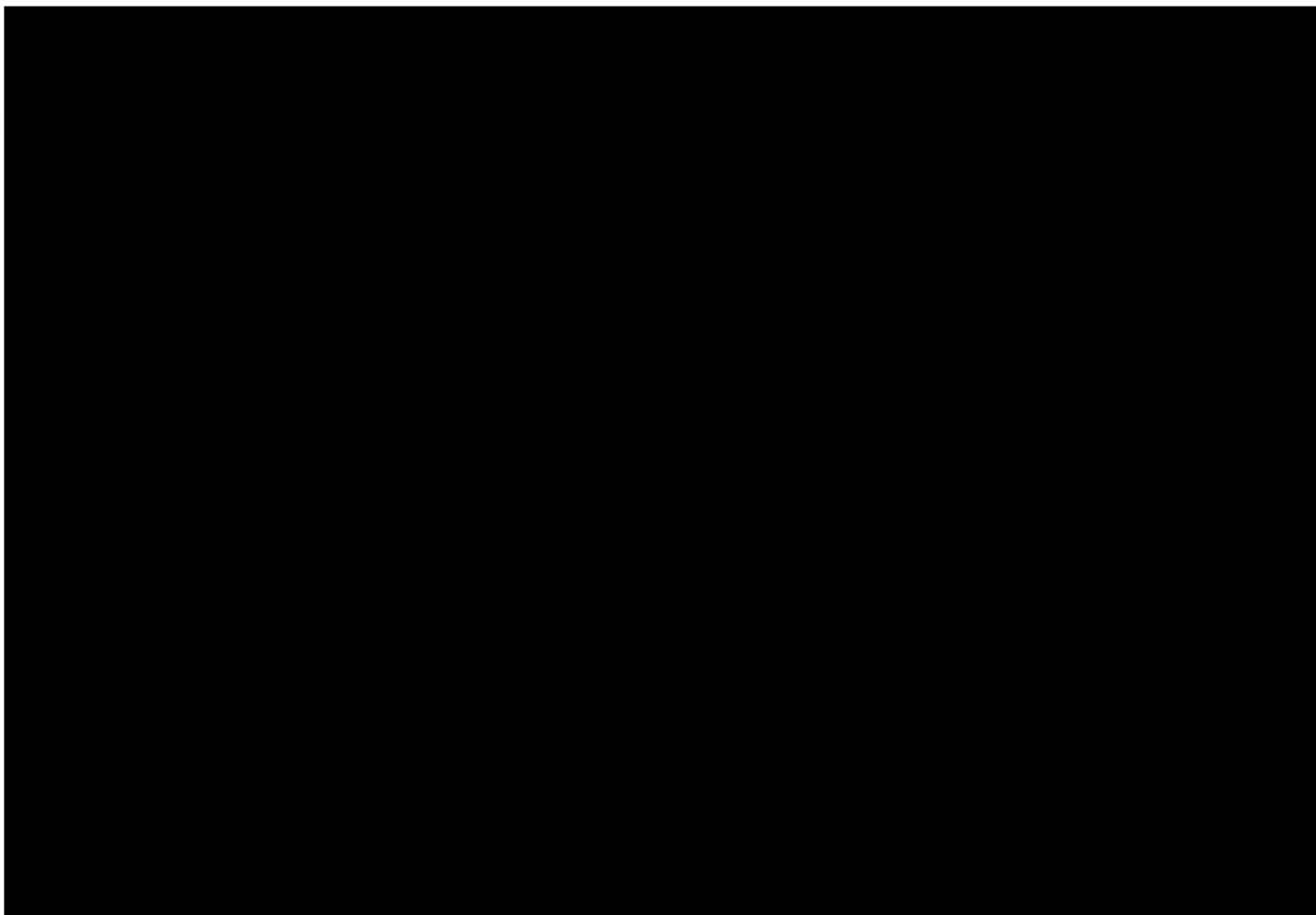


Websites and Mobile Apps



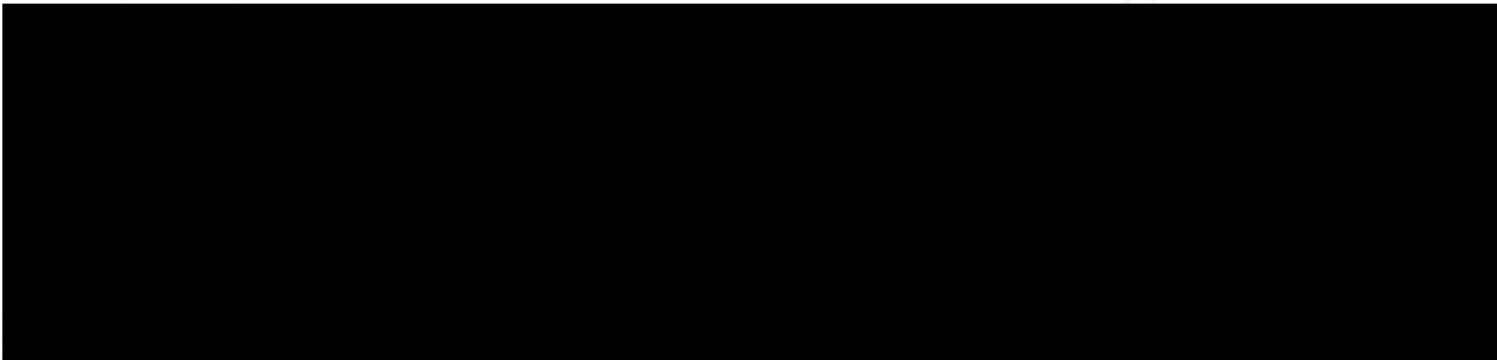


Geolocation

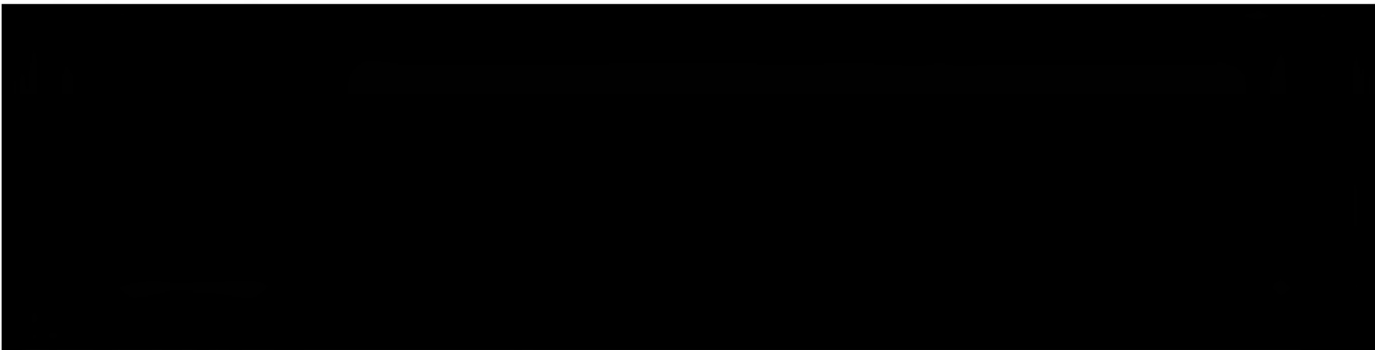


CONFIDENTIAL

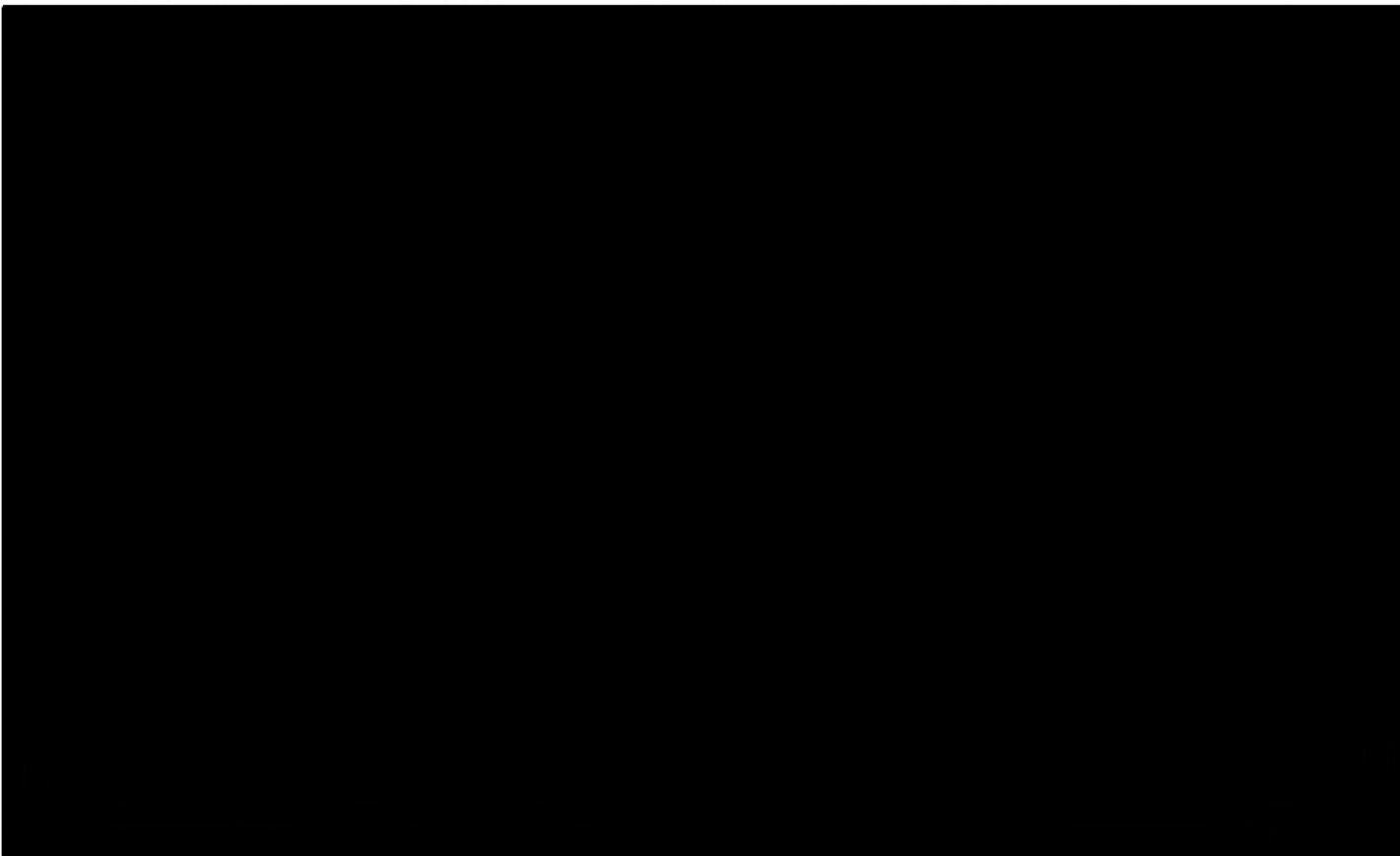


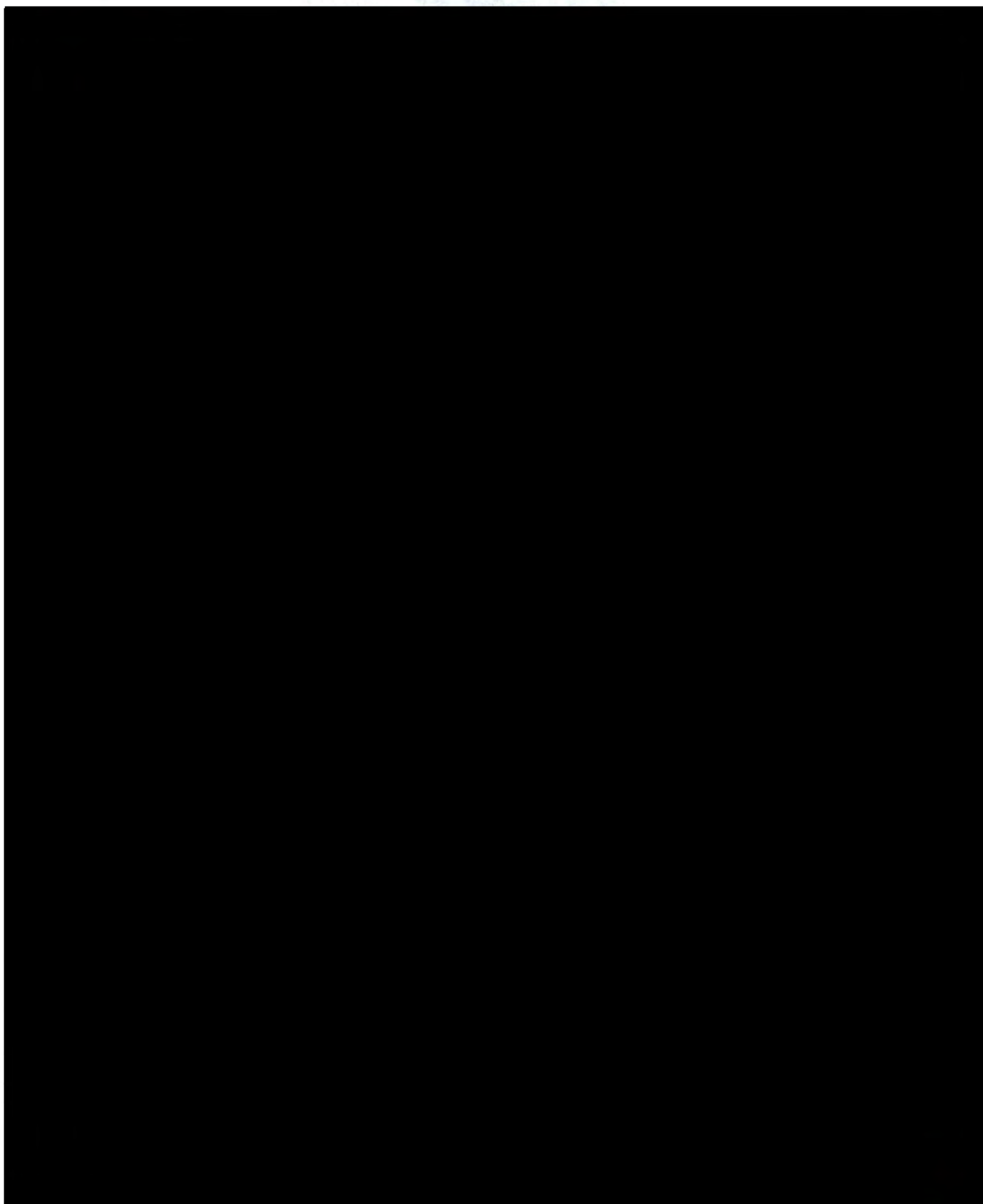


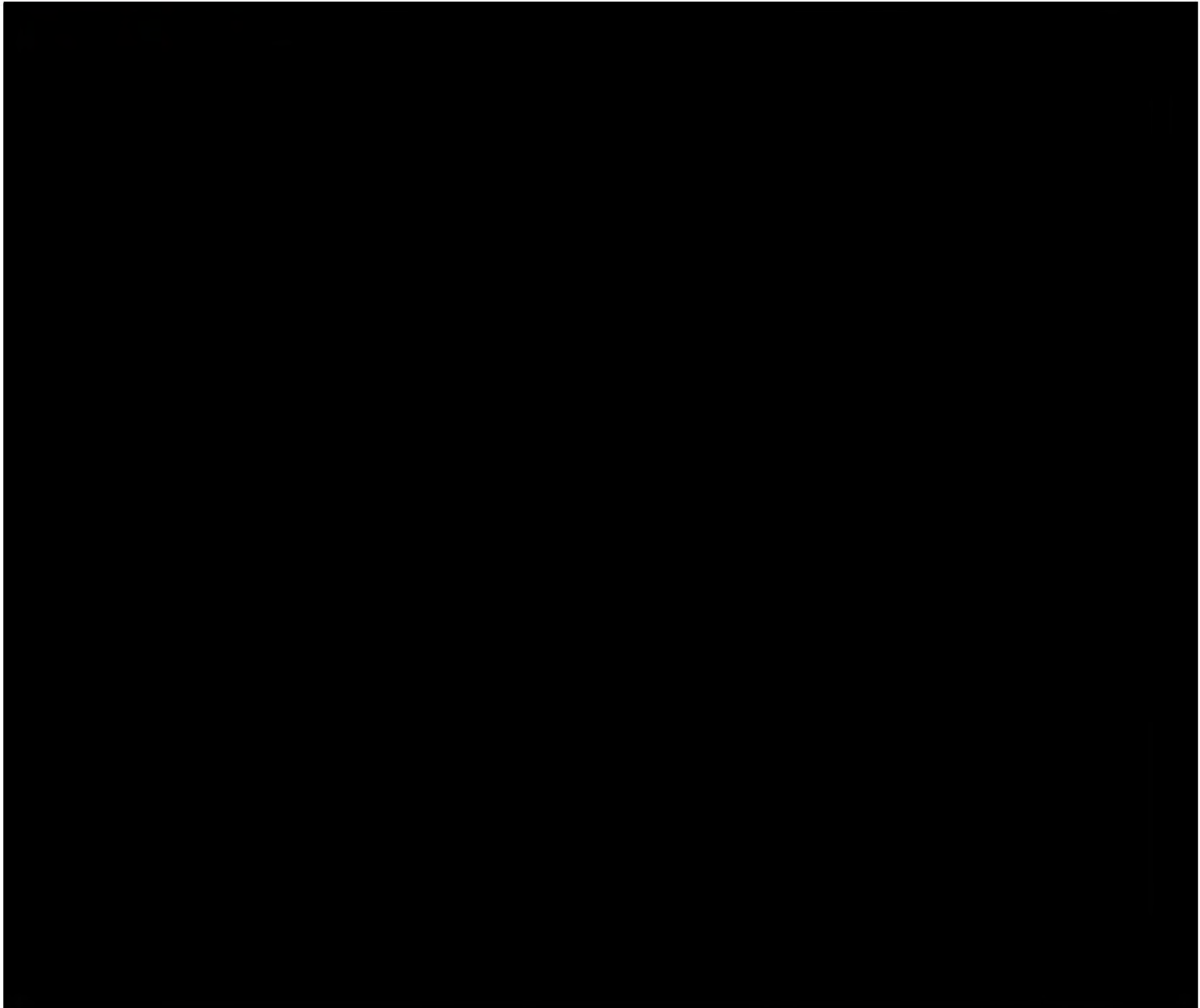
Software Integrity



PointsBet Engines

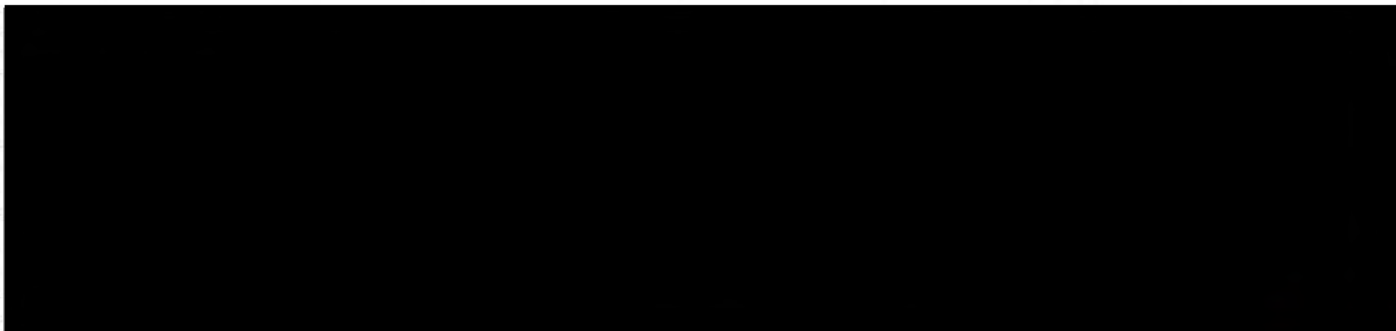






b. List of all current certifications or approvals from certified independent test labs and jurisdictions

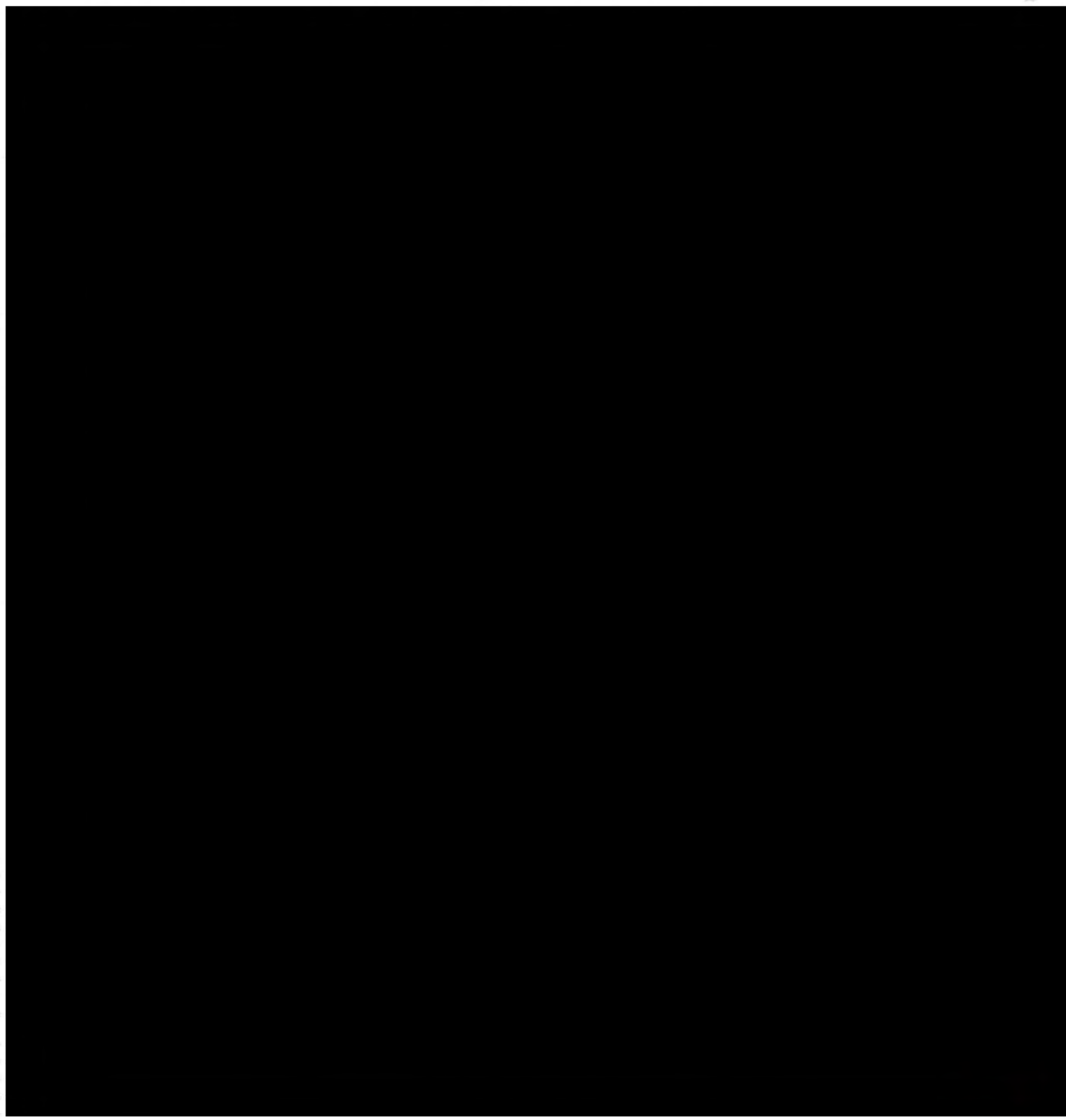
PointsBet has been certified in all jurisdictions it is currently operating in within the United States and Canada by the certified independent testing lab, Gaming Labs International (GLI). Below is a list of these certifications with the date they were obtained.

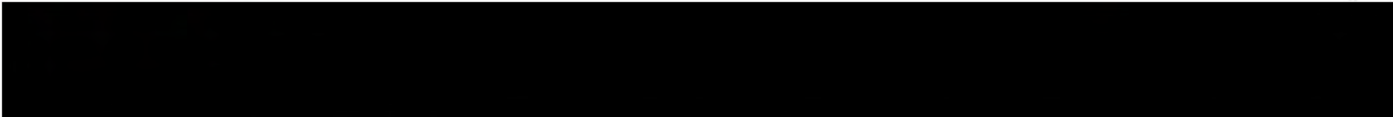


c. Plan for continuous support, maintenance, and change management of the platform

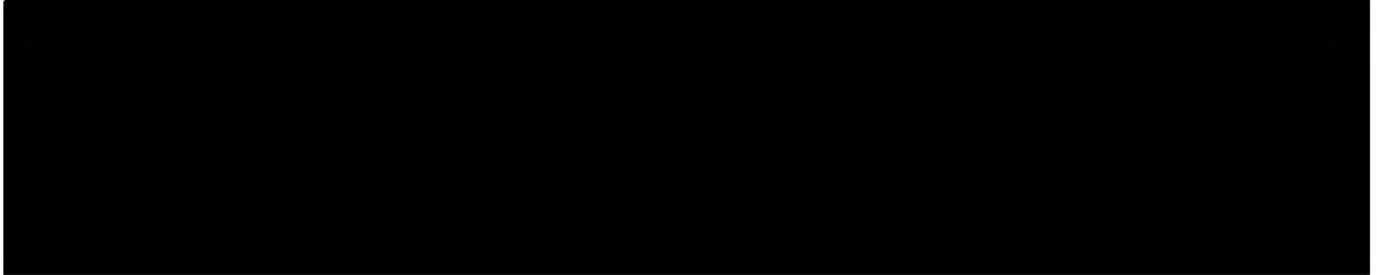
Change Management Procedure

Test Lab Certification, Software Development Process and Release process

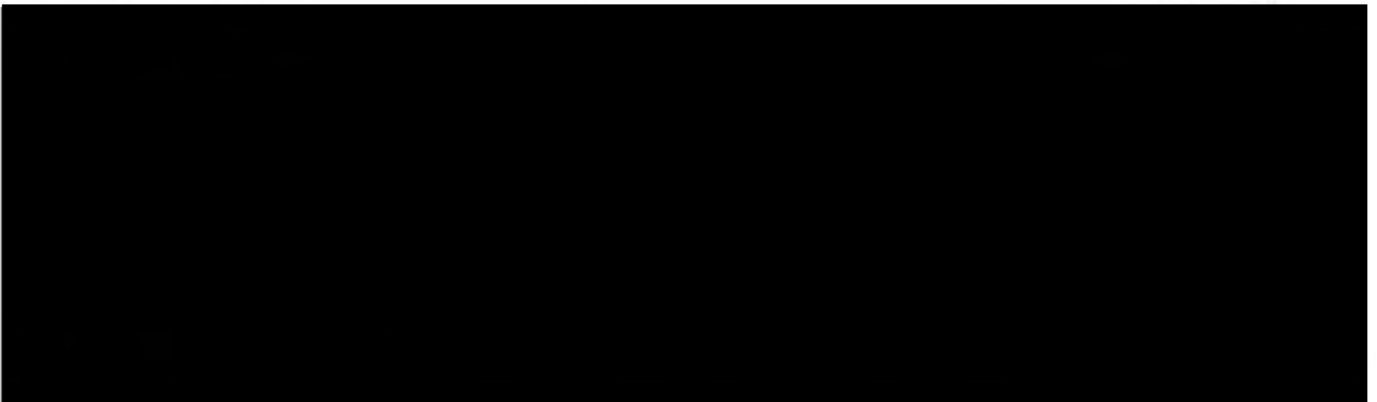




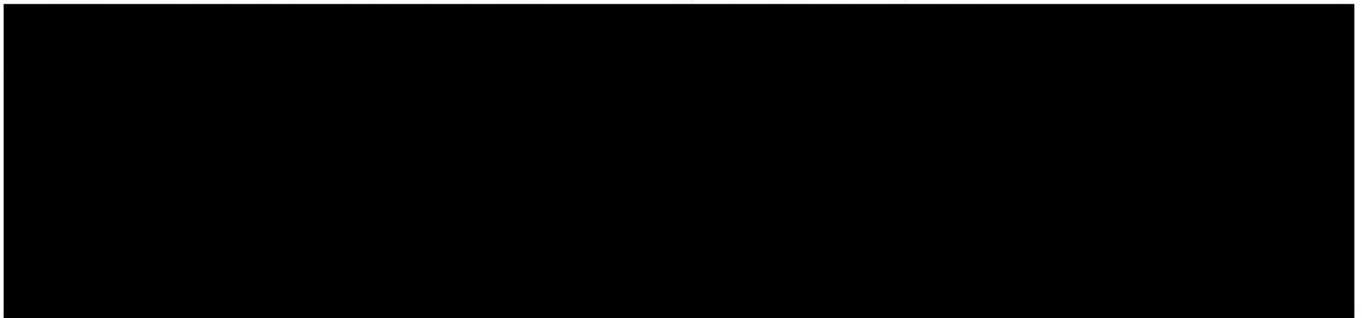
Coding Standards and Documentation



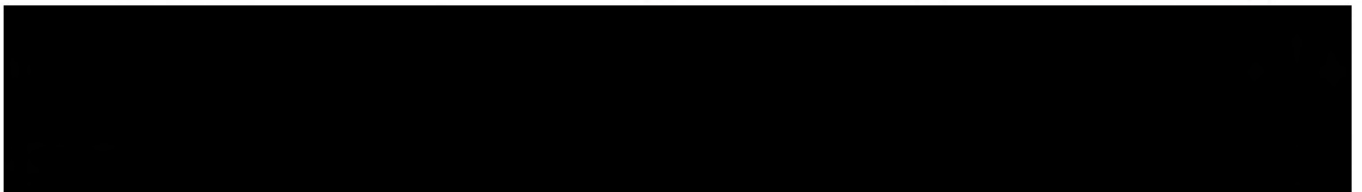
Rollback Process



Emergency Change Procedure



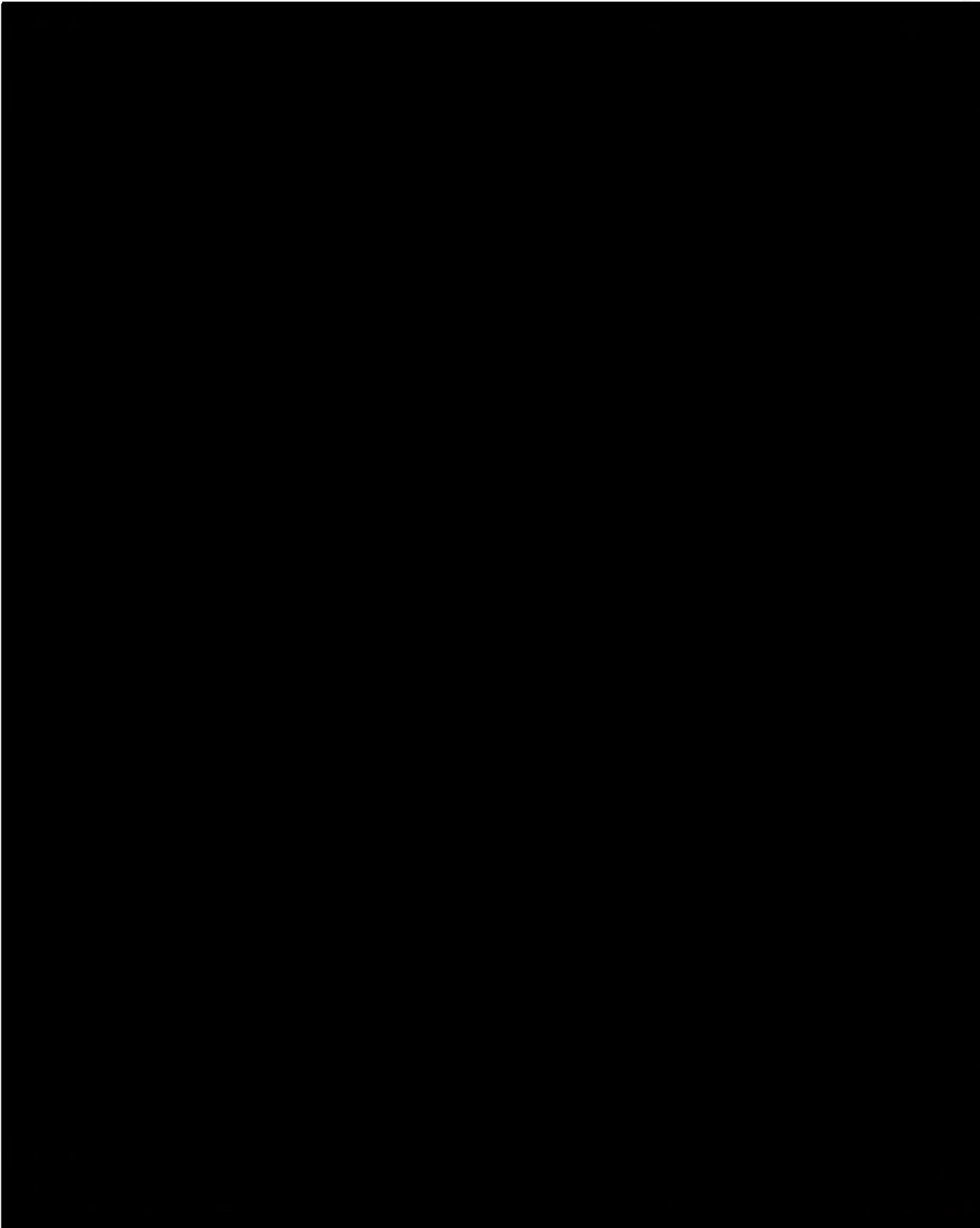
Hardship Requests

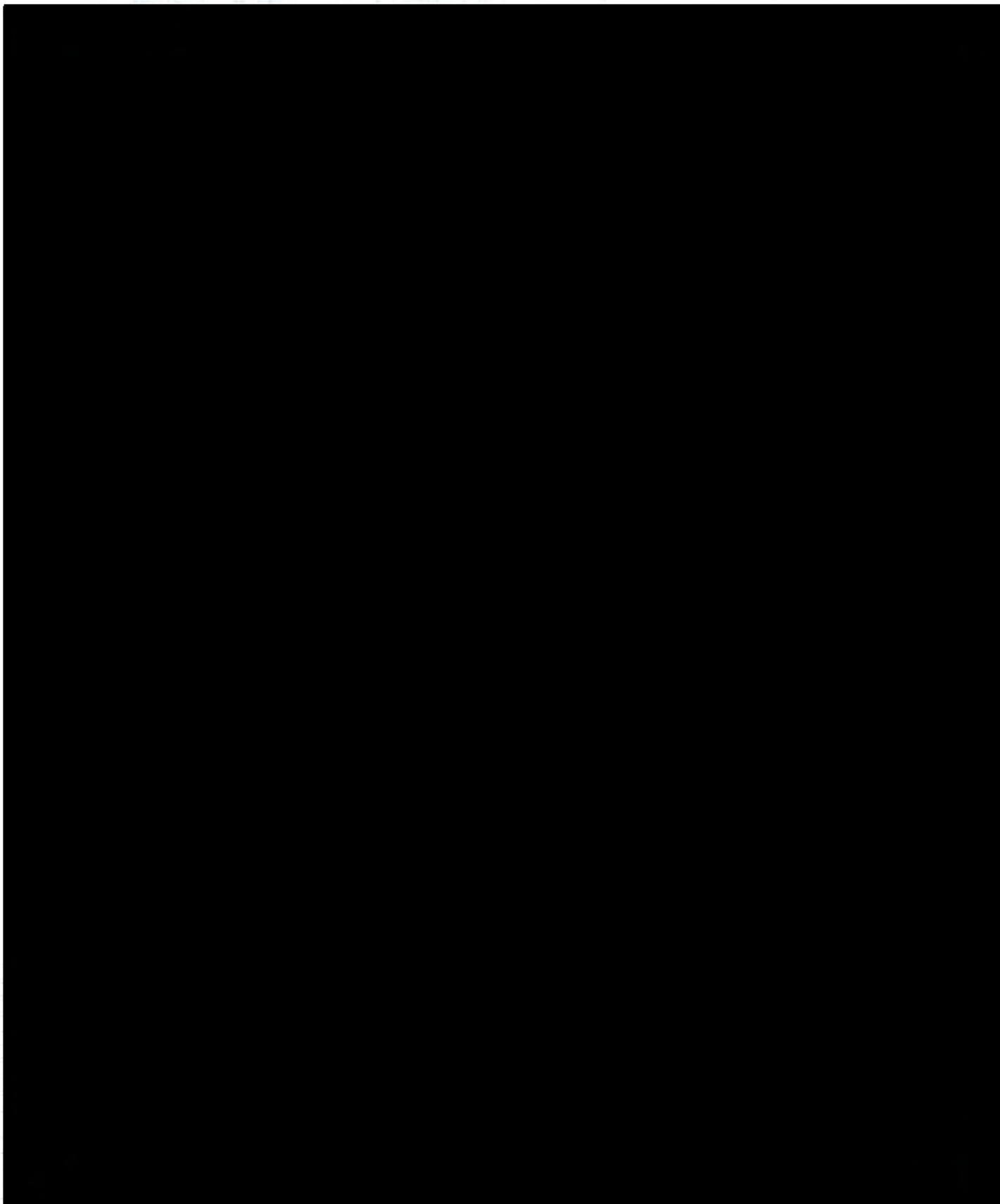


Change Management Log

Online Hardware or Software









System Monitoring



Critical Component Verification



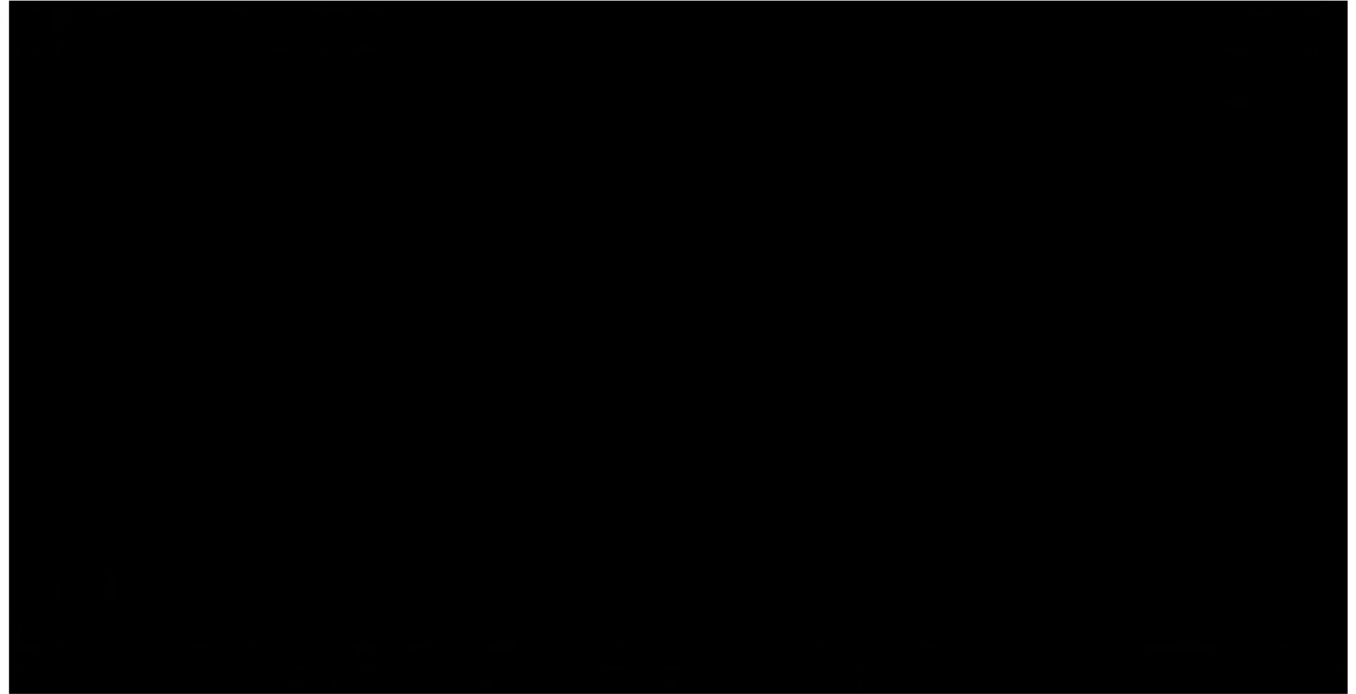
Platform Asset Management



Business Continuity & Disaster Recovery



Disaster Recovery Plan (DRP)



d. Outline the features of the platform designed to support the customers

One of PointsBet's key pillars is to provide a product that supports and is responsive to the needs of the customer. In the most recent E&K report from October, 2022, PointsBet received a 5.3/6 in user experience. This score was 3rd out of the 40 operators reviewed, noting that PointsBet's features set is "one of the best in the industry". Below is an outline of some of the key experiences and features that PointsBet uses to support customers.

Customer Service and Self-Help

Customers always have access to our customer service team. Customers can start an online chat with a live agent from the app/website in which the average wait time of just 25 seconds. Customers are also provided an email and phone number to contact Customer Service if either of those methods are preferred.

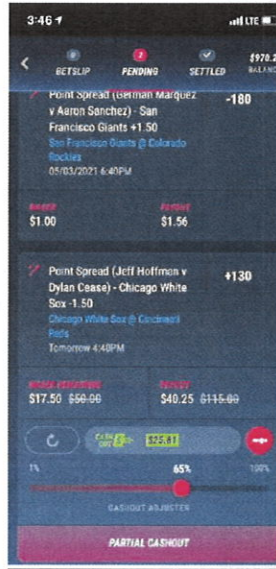
Also, an extensive Help Section can be found in the app and website that documents how to create an account, deposit, withdraw, place bets, and set responsible gambling limits. A crash course on basic sports gambling concepts is also provided. To eliminate any potential confusion, each market we offer has a tooltip next to its name describing exactly what the customer is betting on.

Cash Out and Partial Cash Outs:



A customer can “Cash Out” their bet to reduce the possible loss or to secure the winnings in advance of the event being decided. The Cash Out option is only applicable in certain games and for certain markets, which will be decided at the discretion of the trading team. If the Cash Out option is available, the Cash Out icon will appear on the website/betslip.

Partial Cash Out is a PointsBet feature, giving customers a third option to cash out on a part of their initial stake and still enjoy “the sweat” on the remaining portion of the bet that is retained. Partial Cash Out is available in all markets where Cash Out is currently running.



Same Game Parlays and LIVE Same Game Parlays:

Same Game Parlays (SGP) are a type of bet that allows customers to combine numerous outcomes (or legs) from the same event. All legs must then be successful for the SGP to be a winner.

LIVE Same Game Parlay is a PointsBet feature that allows customers to build Same Game Parlays during a live event. As opposed to a standard Same Game Parlay that must be built pre-game, LIVE Same Game Parlays can be built at any point during an event or game. Currently this feature has been launched for NFL and NBA markets, however more leagues and events will be offered soon. The maximum number of legs you can have in a LIVE Same Game Parlay bet is 20. Since LIVE Same Game Parlays use live odds, markets are constantly updated, and odds will shift during the event.

Parlay Boosters:

PointsBet’s daily Parlay Booster feature allows customers to build any 3+ Leg Parlay or Same Game Parlay of a customer’s choosing and boost you’re the potential profit. Any market that can be parlayed is eligible to have a parlay booster applied. There is no minimum or maximum stake at this time.





PointsBetting:

Unlike traditional fixed odds betting, PointsBetting allows for an exciting wager where the stake will build all the way until the end of an event, which, builds excitement until the clock hits zero. The payout changes up until the last second of the game. If a customer's bet wins by one point (or unit), they will win 1 multiplied by the bet amount (wager). If a customer's bet wins by 2 units, they would win 2 times the wager. If a customer's bet wins by 10 units, they would win 10 times the wager. Conversely if they lose by 1 unit, they will lose 1 times the wager. Lose by 10 units, lose 10 times the wager.

All PointsBetting wagers have a max win and max loss levels displayed in the bet slip when the customer places a bet. This shows the potential winnings, as well as potential losses. For certain markets PointsBet offers the ability to limit the risk of potential losses from a bet further with the stop loss slider. This will also limit the potential winnings. The amount required in a customer's account to cover a percentage of your max loss should the bet lose is withheld until the bet is concluded.

Name a Bet:

If a betting market is not already on the PointsBet website, PointsBet customers may submit a request for a bet to be offered (within reason) and have PointsBet traders price it. All Name A Bets must be on sports PointsBet is allowed to offer and already offers markets. PointsBet restricts Same Game Parlays, parlays that can be built on-site, and very obscure requests. PointsBet strives to get the market up as efficiently as possible. Customers just need to make a request 2 hours prior to the start of the applicable event. It will be at PointsBet's discretion



whether to price the market or not in accordance with state-specific rules and regulations. If the market is priced, the customer will be alerted by email.

NAME A BET

REQUEST YOUR BET

FAQ

WANT TO CREATE YOUR OWN MARKET?

If you would like to bet on a market for any sport/event currently offered and you don't see that market on site, submit it to us and we will price it.

Your Email

We'll use this to notify you when your bet goes live.

Choose your sport

Tell us what bet you want?

Eg: Pascal to score 22 plus points & get 12 rebounds.

REQUEST YOUR BET

NEXT UP

TODAY

- Atalanta v Villarreal 1m 33s
- Shirshov, V v Minkov, M 26m 33s
- Zhurba, N v Kobytov, R 26m 33s
- Burov, S v Ilin, A 56m 33s
- Sadovskiy, N v Fedosov, A 56m 33s
- Sun, E v Lian, A 56m 33s
- Sesi SP/Franca BC v ACBD Rio Claro 4:00pm
- Ball State @ Xavier 4:35pm

Share A Bet:

PointsBet allows customers to share their parlay, big win, future favorite, or even a bad beat with their friends using our Share A Bet feature. Share A Bet lets customers post or send a pending and/or settled bet with the click of a button.





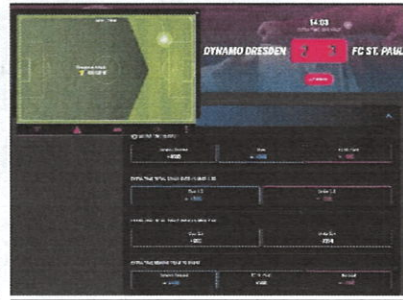
Cancel Tweet

Check out this bet I placed at PointsBet <https://system-usa.test.pointsbet.com/?source=shareabet>



Live Streaming & Visualizations:

PointsBet offers an in-app video player for select sports where customers can watch an event live and make in-play bets. Also, for sports that do not have live streaming available, PointsBet offers visualizations that follow each and every move that the ball, puck, or a player makes with in-game play by play animations, so customers do not miss a single play. Most live streamed events currently consist of Table Tennis, Tennis, European Basketball and Soccer events from around the world. Visualizations are available for almost all other sports and events.



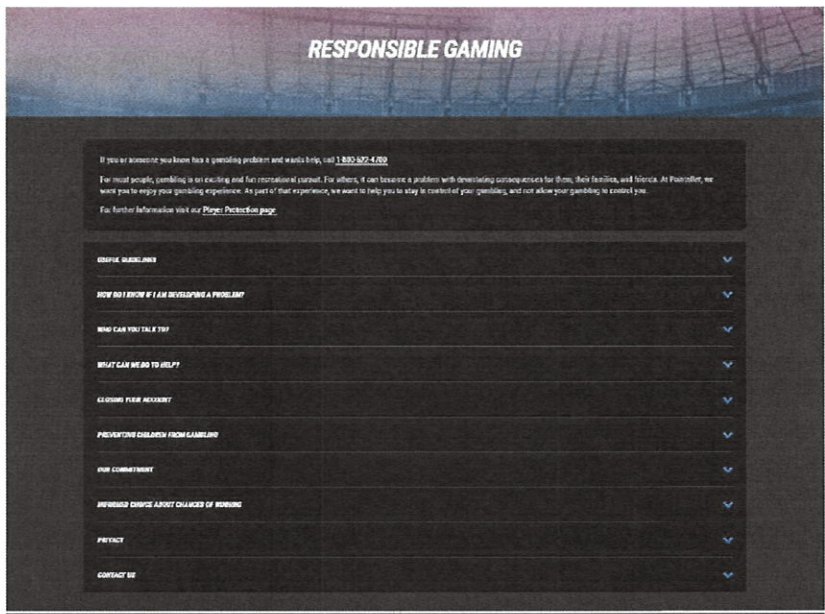
Responsible Gaming Features:

PointsBet offers tools to customers who want to limit their wagering activity. PointsBet’s responsible gaming page is always static at the bottom of the page for users to access at all times and is edited based on jurisdictional requirements. The tools offered include:

- Keeping Track of Your Transactions – A customer can easily access a full history of their transactions, withdrawals, and deposits through the “Transaction History” section of the website.



- Pre-Commitment Limits – PointsBet offers the ability for a customer to set a limit on deposits, limit periods from 1, 7 or 30 days, and maximum betting limits.
- Time-Based Limits or Self-Exclusion from the platform – Time-based limits, Cooling Off periods and full self-exclusions are offered to the customer on the PointsBet platform.
- Problem Gambling Helplines – PointsBet encourages users to reach out to their jurisdictional problem gambling helpline and lists the contact information on the platform.



e. Sample wagering menu the Applicant intends to offer, pending approval from the Commission

Below is PointsBet’s proposed wagering menu to be adjusted to be fully compliant with all applicable rules and regulations. No wagering will be permitted on high school or youth sports teams. Wagering on Massachusetts collegiate sports teams will only be permitted when in a collegiate tournament pursuant to Massachusetts law.

Permitted Wager and Market Types

Unless otherwise specified, for all approved events, we will look to offer any market where the results are determined on the field of play and can be proven by a box score or statistical analysis.

Suggested Wager Types include the following:

- Single
- Parlay
- Teasers/Pleasers
- Round Robin
- Cash Out
- Pools
- Exchange Wagers
- PointsBetting

Approved Market Types include the following:



- Moneyline
- 3-Way
- Spread/Handicap
- Totals
- Player Props
- Game Props
- Team Props
- Futures/Outrights
- In-game/In-play
- Virtual Match Ups
- Next Occurrence
- Win/Place/Each Way
- Yes/No
- Awards

Suggested Catalog of Approved Events

1. Athletics
 - World Athletics (formerly known as International Association of Athletics Federations (IAAF))
2. Australian Rules Football
 - Australian Football League
3. Badminton
 - Badminton World Federation Grade 1 events (international) and Grade 2 events (World Tour)
4. Baseball/Softball
 - Major League Baseball (MLB)
 - NCAA Baseball and Softball
 - World Baseball Classic (WBC)
 - Minor League Baseball (MiLB) – Triple A
 - Japan Nippon Professional Baseball
 - Chinese Professional Baseball League
 - Korean KBO League
 - Athletes Unlimited Softball
 - Northwoods League
 - Texas Collegiate League
 - Mexican Baseball League (LMB)
 - Baseball Series de Caribe (CBC)
5. Basketball
 - National Basketball Association (NBA)
 - Women's National Basketball Association (WNBA)
 - NCAA
 - Euro League/Euro Cup
 - International and domestic events sanctioned by FIBA or FIBA member federations
 - The Basketball Tournament (TBT)
 - Big Three
6. Biathlon
 - International Biathlon Union (IBU)



7. Billiards
 - World Pool Billiard Association Sanctioned Events
8. Bowling
 - Professional Bowlers Associations (PBA)
9. Bowls
 - Professional Bowls Association
 - World Bowls
10. Bull Riding/Rodeo
 - Professional Bull Riders (PBR)
 - Professional Rodeo Cowboys Association (PRCA)
11. Boxing
 - World Boxing Association (WBA)
 - World Boxing Council (WBC)
 - World Boxing Organization (WBO)
 - International Boxing Federation (IBF)
 - British Board of Boxing Control (BBcC)
 - Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
 - Bare Knuckle Fighting Championship
 - African Boxing Union (WB)
 - British & Irish Boxing Authority (BIBA)
 - Global Boxing Union (GBU)
 - International Boxing Association
 - International Boxing Organization (IBO)
 - International Boxing Union (IBU)
 - Irish Athletic Boxing Association (IABA)
 - Women's International Boxing Association (WIBA)
 - World Boxing Federation (WBF)
 - World Boxing Union (WBU)
12. Chess
 - International Chess Federation (FIDE)
 - PlayMagnus AS
13. Cornhole
 - American Cornhole League (ACL Pro Division)
14. Cricket
 - International and domestic events sanctioned by the International Cricket Council (ICC) or ICC member federations
15. Cycling
 - Union Cycliste International (UCI) Sanctioned Events
16. Darts
 - Professional Darts Corporation (PDC) Sanctioned Events
 - British Darts Organization (BDO) Sanctioned Events
 - MODUS Events
 - World Dart Federation (WDF)
17. Disc
 - American Ultimate Disc League



18. eSports

- Call of Duty League
- Counterstrike Global Offensive (CS:GO)
 - Blast Premier League
 - Electronic Sports League Sanctioned Events (ESL)
 - DreamHack Sanctioned Events
 - Intel Extreme Masters (IEM)
- League of Legends (LoL)
 - LCK – League of Legends Champions Korea
 - LCS – League of Legends Champions Series
 - LEC – League of Legends European Championship
 - Riot Games Sanctioned Events
 - World Championships
- Dota 2
 - Valve Sanctioned Events
- NBA 2k League
- Overwatch League
- Rainbow 6
 - Ubisoft Sanctioned Events
- Valorant
 - Riot Games Sanctioned Events

19. Floorball

- International and domestic events sanctioned by Floorball Federation (IFF) or IFF or IFF member federations

20. Football

- National Football League (NFL)
- NCAA
- Canadian Football League (CFL)
- College Senior Bowl
- USFL
- XFL
- Indoor Football League (IFL)

21. Futsal

- International and domestic events sanctioned by FIFA or FIFA member federations

22. Golf

- Events sanctioned by the International Federation of PGA Tours or its members
- International Events (i.e. Ryder Cup, Solheim Cup, Presidents Cup)
- The Match Series
- Major Championships

23. Handball

- International and domestic events sanctioned by the International Handball Federation Events (IHF) or IHF member federations
- European Championship League

24. Hockey – Field

- International Hockey Federation (FHI) Sanctioned Events

25. Hockey - Ice



- National Hockey League (NHL)
 - International and domestic events sanctioned by the International Ice Hockey Federation (IIHF) or IIHF member federations
 - NCAA
 - American Hockey League (AHL)
26. Jai-Alai
- Magic City Jai Alai
27. Lacrosse
- NCAA
 - Premier Lacrosse League
 - National Lacrosse League
 - World Lacrosse Sanctioned Events (Country v Country)
28. Mixed Martial Arts (MMA)
- Ultimate Fighting Championship (UFC)
 - Road to UFC
 - Dana White's Contender Series
 - Bellator MMA
 - ONE Championship
 - Professional Fighters League (PFL)
 - PFL Challenger Series
 - Cage Warriors
 - Glory
 - Invicta Fighting Championship
 - KSW
 - Legacy Fighting Alliance (LFA)
 - Spectation Sports
 - Sanctioned by Association of Boxing Commissions and Combative Sports associated commission or other US State Association
29. Olympics (including trials)
- Summer Olympics
 - Winter Olympics
30. Racing
- NASCAR:
 - Xfinity Series
 - Camping World Truck Series
 - NASCAR Cup Series
 - Fédération Internationale de l'Automobile (FIA) Sanctioned Events
 - Fédération Internationale de Motocyclisme (FIM) Sanctioned Events
 - Indy Racing League (Indy Car)
 - Superstar Racing Experience (SRX)
 - National Hot Rod Association (NHRA)
 - United States Auto Club (USAC) Sanctioned Events
31. Netball
- ANZ Premiership
 - Super Netball
32. Olympics



- Summer Olympics
 - Winter Olympics
 - Olympic qualifying
33. Pesapallo
- Finnish Superpesis
 - Finnish Ykkospesis
34. Rowing
- University Boat Race
35. Rugby League
- International and domestic events sanctioned by International Rugby League (IRL) or IRL member federations
36. Rugby Union
- International and domestic events sanctioned by World Rugby or World Rugby member federations
 - SANZAAR Sanctioned Events
37. Sailing
- Americas Cup
 - Prada Cup Challenger Selection Series
38. Snooker
- World Snooker Sanctioned Events
 - World Professional Billiards and Snooker Association (WPBSA) Sanctioned Events
 - World Pool-Billiard Association (WPA) Sanctioned Events
 - International World Games Association (IWGA) Sanctioned Events
39. Soccer
- International and domestic events sanctioned by FIFA or FIFA member federations
 - Audi Cup
 - International Champions Cup
 - NCAA
40. Soccer – Beach
- Euro Beach Soccer League
 - Beach Soccer Worldwide Intercontinental Cup
41. Summer Athletics
- Commonwealth Games
 - X-Games
 - World Athletics Championships
 - World Athletics Indoor Tour
 - World Athletics Continental Tour
 - European Athletics Championships
42. Swimming
- Federation Internationale de Natation (FINA) World Championships
43. Table Tennis
- International and domestic events sanctioned by the International Table Tennis Federation (ITTF) or ITTF member federations
 - TT Elite Series Poland
 - TT Star Pro Series
 - Challenger Sao Paolo
 - TT Trophy Hungary



- Armenia ITT Cup League
 - Challenger Series Betiebs GmbH.
44. Tennis
- ATP Tour Events; including Challenger Tour
 - Grand Slam Events
 - International Tennis Federation (ITF) Sanctioned Events (including country v. country)
 - United States Tennis Association (USTA) Sanctioned Events
 - World Team Tennis
 - WTA Tour Events
45. Volleyball
- International and domestic events sanctioned by the Federation International de Volleyball (FIVB) or FIVB member federations
 - Leagues and Events organized by FIVB member federations
 - AVP Pro Beach Volleyball
 - NCAA
46. Waterpolo
- FINA World Championships
 - FINA World Cup
 - FINA World League
 - Ligue Européenne de Natation (LEN) European Championships
 - LEN Champions League
 - Adriatic League
 - Italian Serie A1
47. Winter Athletics
- X-Games
 - International Skating Union (ISU) World Championships and World Cup
 - International Bobsleigh and Skeleton Federation (IBSF) World Championships
 - International Luge Federation (FIL) World Championships
 - Fédération Internationale de Ski (FIS, International Ski Federation) World Cup
 - Four Hills Tournament

f. Description of Applicant’s proposed ability to commence mobile sports wagering on the platform

PointsBet has a proven track record and considerable experience and of launching in numerous states across the U.S. and Canada. PointsBet’s experienced multi-disciplinary launch teams have demonstrated our agile, flexible and rapid deployment capabilities when launching the PointsBet technology platform and marketing campaigns in every new jurisdiction that PointsBet has entered. PointsBet will leverage our experienced go-to-market planning and launch execution in Massachusetts. PointsBet has consistently met and exceeded launch timing expectations as we have broadened our North American footprint. A key pillar that has allowed PointsBet to have flexibility and speed to launch is our proprietary technology that we can quickly scale and adapt to local state rules, regulations and requirements. That same capability will be brought to our go-to-market efforts in Massachusetts.

PointsBet has distinguished itself as a top operator within the U.S. market. The most recent mobile sports wagering launch in Kansas featured PointsBet as one of the six operators allowed to launch operations on the first day that mobile wagering was live in the state. PointsBet also expects to be on the starting line for mobile operation in future jurisdictions, such as Maryland and Ohio. PointsBet’s success in new jurisdictions can in part, be attributed to its ability to meet tight regulatory timelines and launch its sports wagering platform on the



first day of operations in a new jurisdiction. With the expansion of the U.S. market, PointsBet prides itself as being a top operator, with the capability to be available to customers on the first day of legal wagering within a state.

A second key pillar that PointsBet will leverage in the immediate term and into our go-to-market launch execution is PointsBet's partnership with NBC Sports as their official sports betting partner. This market-leading partnership will open audiences and proliferate PointsBet's brand and product into the hands and households of millions in Massachusetts. PointsBet will, amongst other things, look to leverage NBC Sports regional and local networks in Massachusetts that will allow for a tailored marketing to Massachusetts residents. As we introduce those potential customers to sports bettors and grow the PointsBet reach in Massachusetts, PointsBet's cutting-edge acquisition tools and promotions will ensure that we convert new customers onto the PointsBet platform.

g. How the Applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.

PointsBet intends on using the following procedures to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.:

Procedures on initial account sign-up

During signup, customers are required to confirm, via check box, the following:

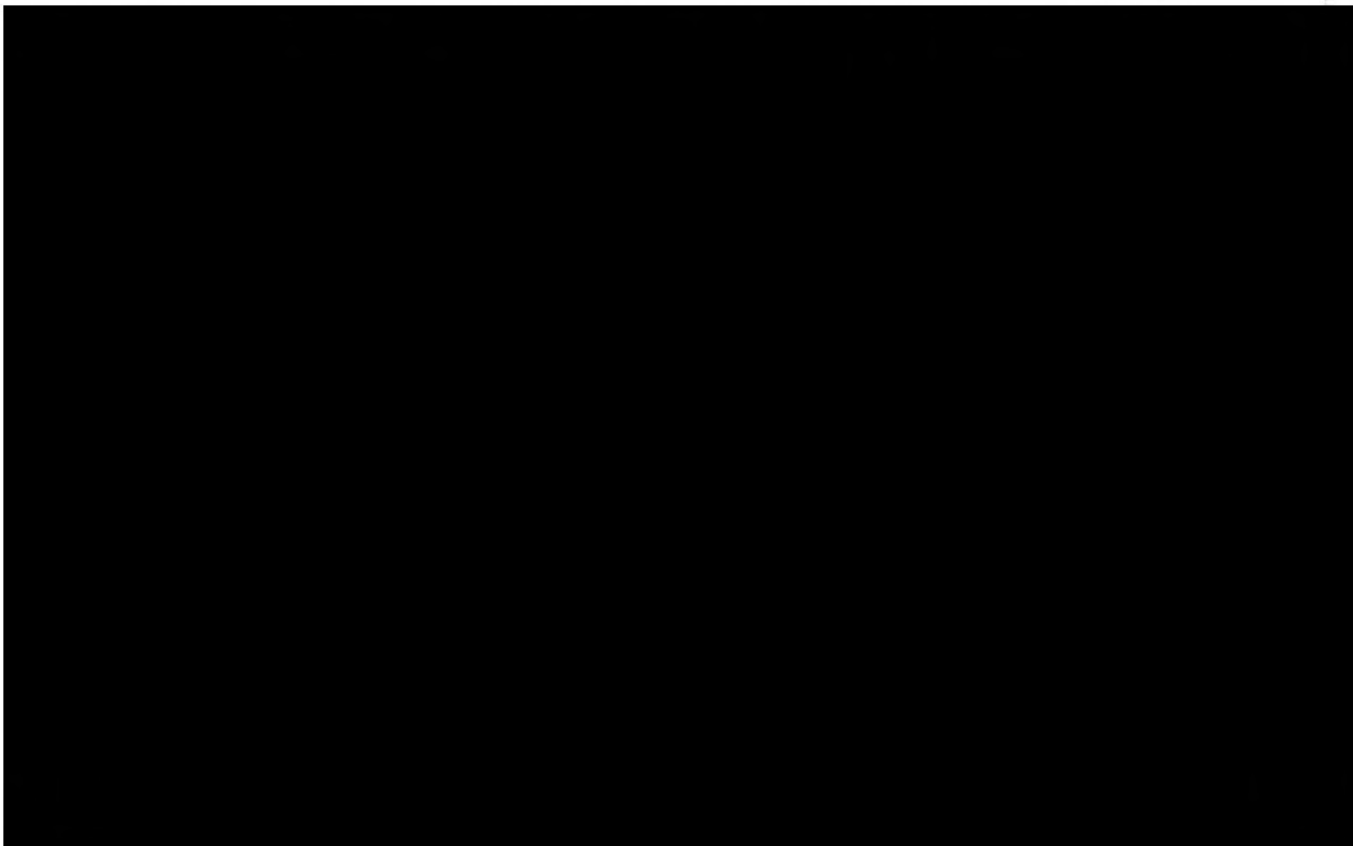
- The customer has read, understands accepts PointsBet's Terms of Use, Privacy Policy and agrees to have their identity information verified.
- The customer must acknowledge that the legal age for internet or mobile gaming is 21, that they meet this age requirement and that they are prohibited from allowing any other person to access or use their internet or mobile gaming account.
- The customer must acknowledge that they are not prohibited from participating in sports wagering by the Massachusetts Gaming Commission.
- The customer must declare that all the information they have provided is true and correct.



- The customer must acknowledge that they may not wager on a sporting event sponsored, organized, or conducted by a particular sport's governing body if they are associated with that governing body.

If the customer does not accept any of the above conditions, the customer is barred from creating an account with PointsBet.

During account creation, PointsBet checks if the customer is on the Massachusetts self-excluded person list. If the user is on the self-excluded person list, the user is barred from creating an account with PointsBet.



h. Outline any technology to be used or features offered that the applicant believes sets their platform apart from those of (potential) other applicants

PointsBet is passionate about creating a best-in-market user experience and providing a wide array of features. With an overall score of 16.3 out of a possible 20 in an App-By-App testing results and analysis ranking by the E&K study done in October 2022, PointsBet ranked 3rd overall, with the highest scoring received in the user experience and features section on the testing.

PointsBet's successful and timely platform deployment in many jurisdictions in the United States has resulted in a proud track record of exemplary performance when it comes to technology. We have been able to localize the platform in short time frames to launch in multiple jurisdictions with all of the features and functionality our customers expect from a market leading brand.

In-House Technology

PointsBet has developed a proprietary consolidated analytics technology stack, enabling data-driven decisions to optimize its sports wagering operation and offer an outstanding player experience. PointsBet understands



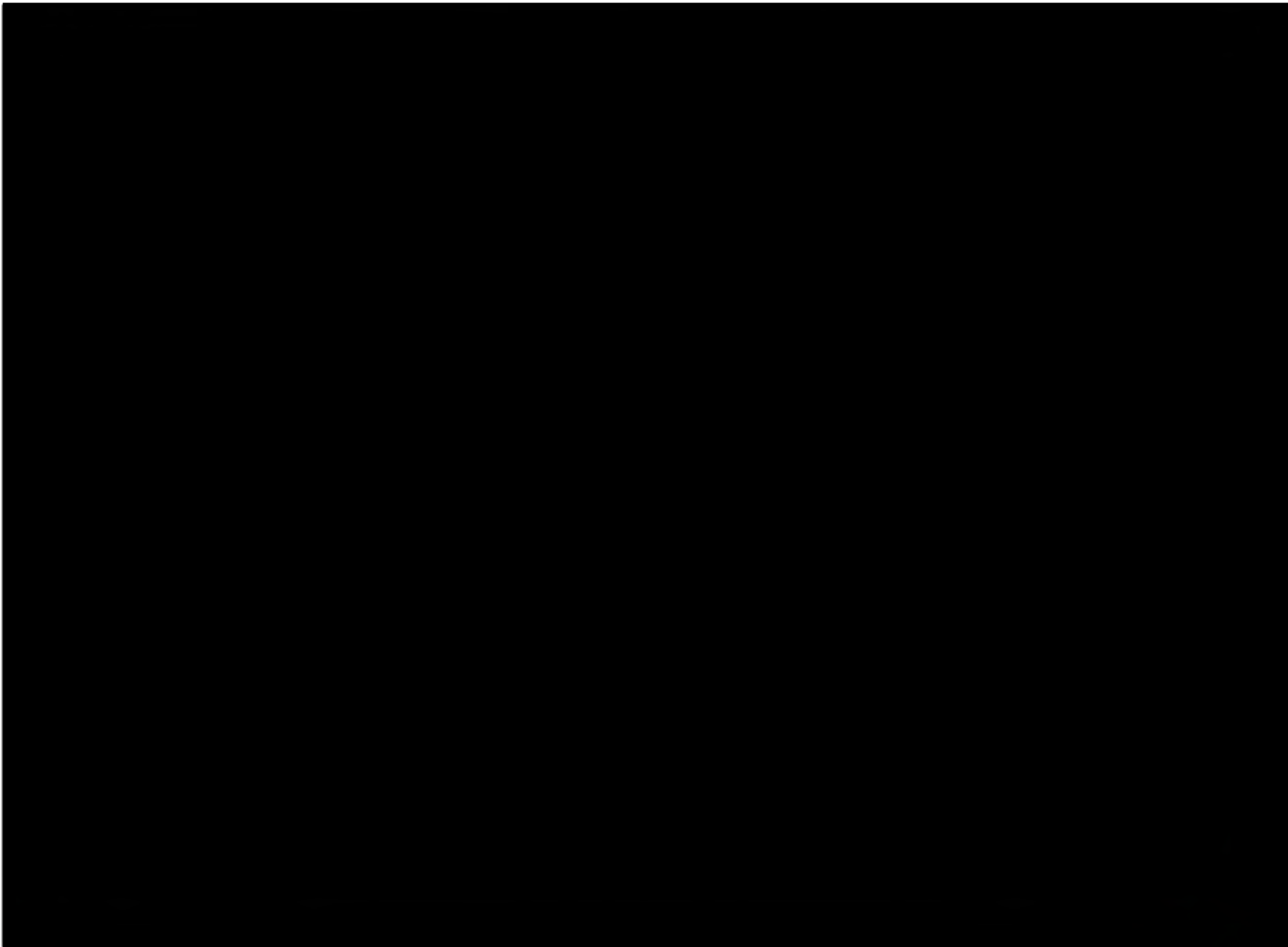
that technical integrity is paramount and has implemented modern information security practices to continually protect from and detect bad actors, bot attacks, and other types of threats.

From inception, our in-house technology has proven to be capable of withstanding even the most onerous and demanding of environments, including Superbowl Sunday and March Madness where our performance remains constant at approximately 99.9% uptime. PointsBet anticipates that Massachusetts will be a demanding and world-leading marketplace that requires superior technology, expertise, experience and a proven track record of platform excellence.

Scalability

Another aspect that PointsBet values as it expands operations is the compounding nature of technology growth and development. The platform is constantly being augmented and improved by a skilled team of developers using modern techniques to ensure their developments build on top of an already superior technology stack. The team has already proven to be nimble and evolve with the demands of regulators, partners and importantly, the sports wagering consumers. PointsBet has built a rapidly growing global Product & Technology, and Analytics team with deep domain experience in sports wagering and iGaming with development centers in the U.S. (Colorado, New Jersey, Nevada), Australia, Ireland, Philippines, and India.

Dependability



Features

PointsBet has continuously upgraded and evolved its feature set since the platform first began accepting sports wagers. Given the entire product feature roadmap is wholly owned internally and is not dependent on third-party technology providers as is common in our industry, we have flexibility to design and execute ideas, innovations and upgrades that other competitors are not able to do. This functionality is a key reason why our customers keep returning to the platform and PointsBet is an award-winning platform.

To illustrate a few of the key features of PointsBet's award winning platform, some of the latest and most popular components of the platform are set-out below.

1. **PointsBetting** – a unique bet type, only available at PointsBet, that allows our customers to wager on an outcome and be rewarded for each point they are right (and vice versa for each point they are wrong). Being unique to PointsBet, this serves as a strong retention tool and a differentiator in a crowded space.
2. **Same Game Parlay** – This allows customers to wager on multiple outcomes within a single event, including a wider variety of player props. Same game parlays are an exciting and engaging way for customers to participate in and enjoy their betting experience.
3. **Live In-game Betting** – PointsBet uses its in-house modeling and algorithms through its acquisition of Banach Technology and the in-house systems (colloquially referred to internally as “OddsFactory”) to create wide range of in-play event markets. PointsBet's live in-game betting has enabled new betting opportunities for customers through deep market offerings, player props, live same game parlays, and lightning markets. Live in-game betting creates the best customer experience through increased limits, low bet delays, high market uptimes and cashout opportunities. PointsBet launched these markets through OddsFactory in November 2021 for NFL games. Since then, NBA, NCAA, Soccer and MLB have successfully launched live in-game betting through OddsFactory. PointsBet intends to expand into more leagues with the OddsFactory system throughout next year and into the future to create a faster in-game betting experience for the customer.
4. **Cash Out (including Partial Cash Out)** – PointsBet offers the ability for customers to cash out their bets after bet placement (and prior to the bet settlement). The more unique feature is the ability for customers to select “Partial” cash out and keep a portion of the bet alive, while returning the rest to their account balance. This leads to constant engagement during live events and drives extra activity on the platform.
5. **Parlay Booster Tokens** – PointsBet provides two “tokens” to customers each day allowing customers the chance to receive extra “profit” on one parlay bet and one Single Game Parlay bet per day. This drives high perceived value to the customer and leads to repeat play days, and extra bets per play. This is unique to PointsBet and an area that will continue to expand.
6. **Rewards** – PointsBet offers a rewards program to customers, allowing them to earn Rewards points on every single bet. More points are earned for Parlays and PointsBetting bets and all rewards points can be redeemed for Free Bets, to be used immediately.
7. **Name-A-Bet** – PointsBet is the only sportsbook to allow customers the opportunity to request any bet type they might not find on site. The requests are automatically fed through to our Sports Analytics team who will build out eligible bets on site within 30 minutes and notify customers immediately. This builds a strong two-way communication avenue between customer and our sportsbook, allowing for the highest level of personalization.



8. Platinum & Diamond Club – PointsBet offers two invitation-only clubs for its highest echelon of loyal customers. Both clubs offer personalized promotions, concierge service, extra booster tokens, extra rewards points and can involve events/experiences as well as a 24/7 account manager.

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

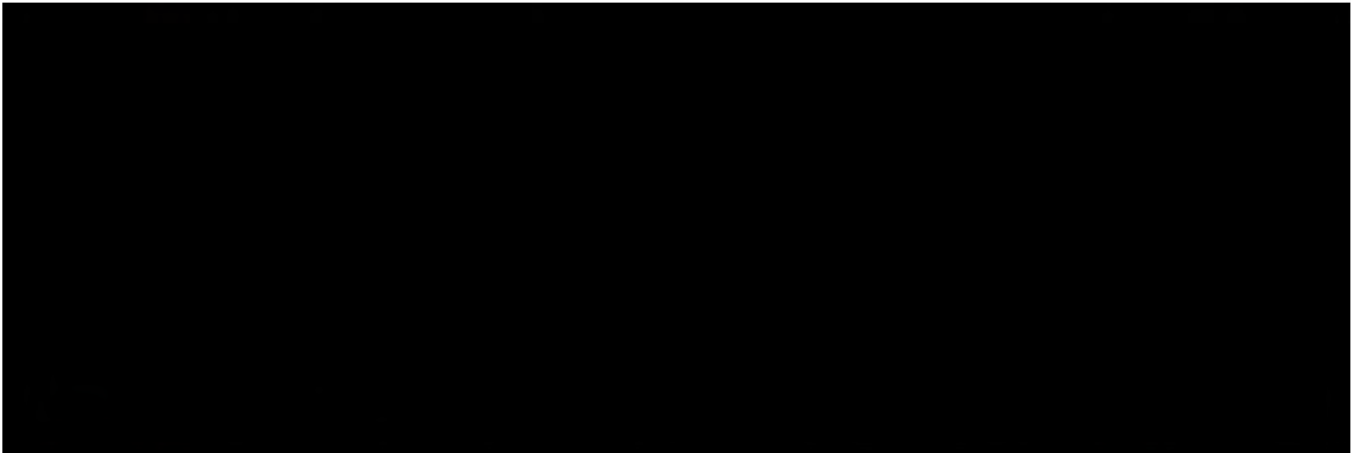
a. The number of current full-time and part-time employees within the Commonwealth

PointsBet currently has [REDACTED] working full-time in the Commonwealth. PointsBet has main offices in Denver, Colorado, Chicago, Illinois and New York City, New York with remote workers across the country as needed. As an untethered mobile applicant, PointsBet considers hiring suitable candidates to be employees based within the Commonwealth for remote positions as appropriate.

b. The number of current work locations within the Commonwealth

As an untethered mobile applicant, PointsBet does not currently have any office space in the Commonwealth. PointsBet's employees that are current residents of Massachusetts currently work remotely.

c. The number of proposed full-time and part-time positions that will be created within the Commonwealth



d. The title, job description, salary, and benefits information for each of the proposed positions



[REDACTED] For all our Job Descriptions we include Job Title, Location, About PointsBet, Responsibilities, Requirements, Benefits, EEOC statement & Responsible Gambling statement. We also include salary details based on state regulations.

e. The training that will be required and made available for all proposed positions

Staff within the Commonwealth will receive workforce development training on PointsBet culture, sports betting compliance, responsible gambling, preventing harassment in the workplace, and various leadership development courses.



f. The number of proposed work locations that will be created within the Commonwealth



In previous jurisdictions that PointsBet has launched operators in, there has been an expansion of resources and locations spent across the U.S. PointsBet started as a lone office in New Jersey for U.S. operations, but has expanded across the country as new jurisdictions and opportunities opened up. For example, a main U.S. office was built in Denver, CO once operations launched in the state. A full content studio and office was recently opened in New York City, NY to accommodate needs as PointsBet expanded its New York operations. PointsBet always takes advantage of new and unique opportunities to expand across the country and Massachusetts would be another great opportunity to explore similar expansions.

g. Description of plans for workforce development opportunities for Applicant’s staff within the Commonwealth

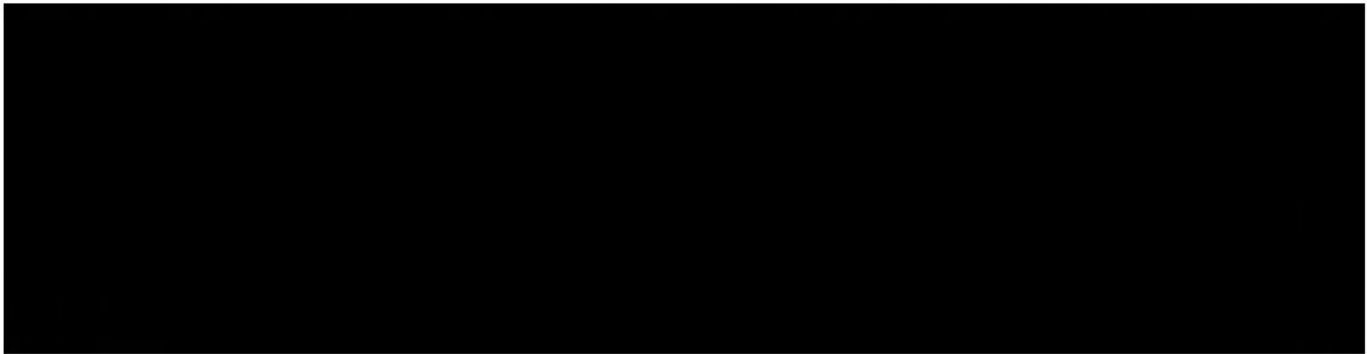
Staff within the Commonwealth will receive workforce development training on PointsBet culture, sports betting compliance, responsible gambling, preventing harassment in the workplace, and various leadership development courses.

h. Outline the strategy for focusing on job opportunities and training in areas and demographics with high unemployment and/or underemployment

All PointsBet applicants and employees have access to opportunities for career growth and learning and development. This includes access to information on open roles, training on PointsBet culture, sports betting compliance, responsible gambling, preventing harassment in the workplace, and various leadership development courses.

C.2 PROJECTED REVENUE Provide studies and projections for gross sports wagering revenue for each of the first five years of wagering operations on a best, average, and worst, case basis. The studies and information provided should include:

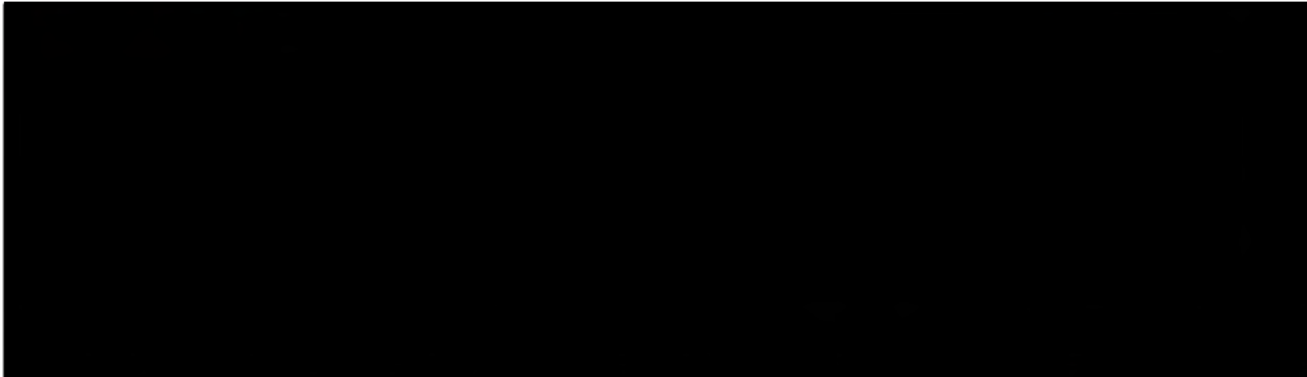
a. Projected figures for sports wagering revenue and methodology used to arrive at these projections



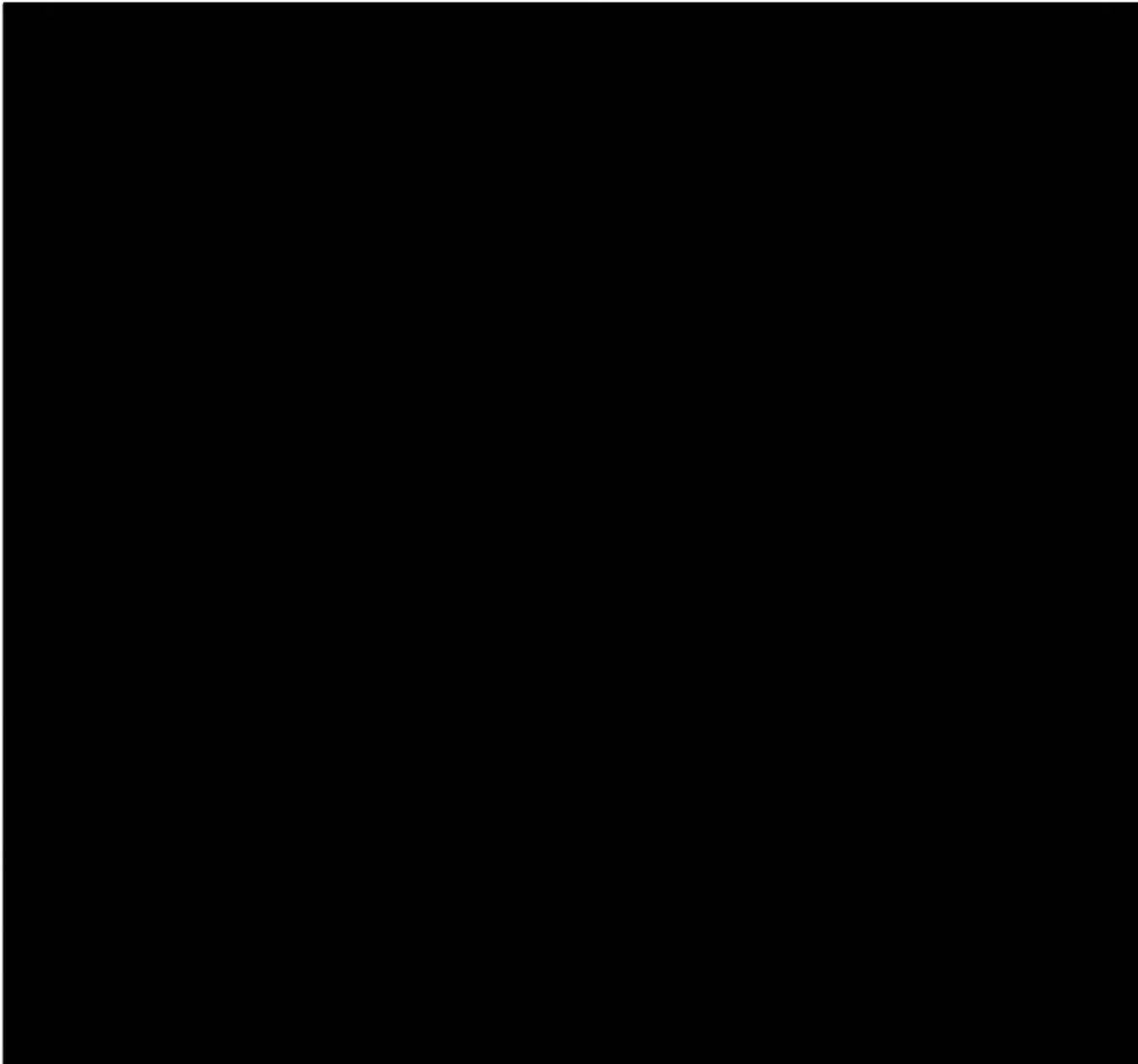
b. Projected figures for any non-sports wagering revenue and methodology used to arrive at these projections

PointsBet does not have projected figures for any non-sports wagering revenue in Massachusetts.





g. Description of plans to compete with other nearby jurisdictions and to market to Massachusetts patrons

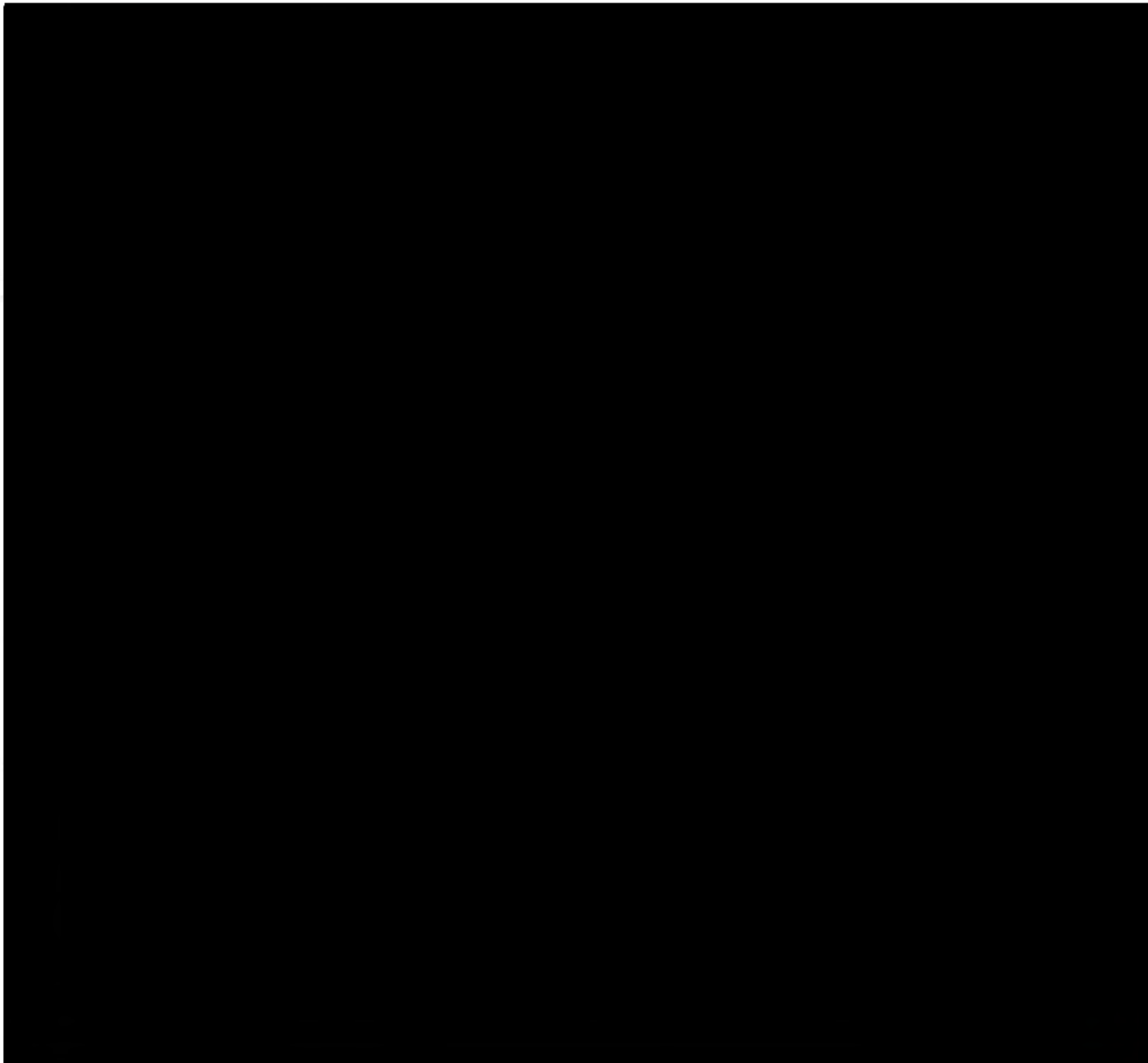


C.5 COMMUNITY ENGAGEMENT

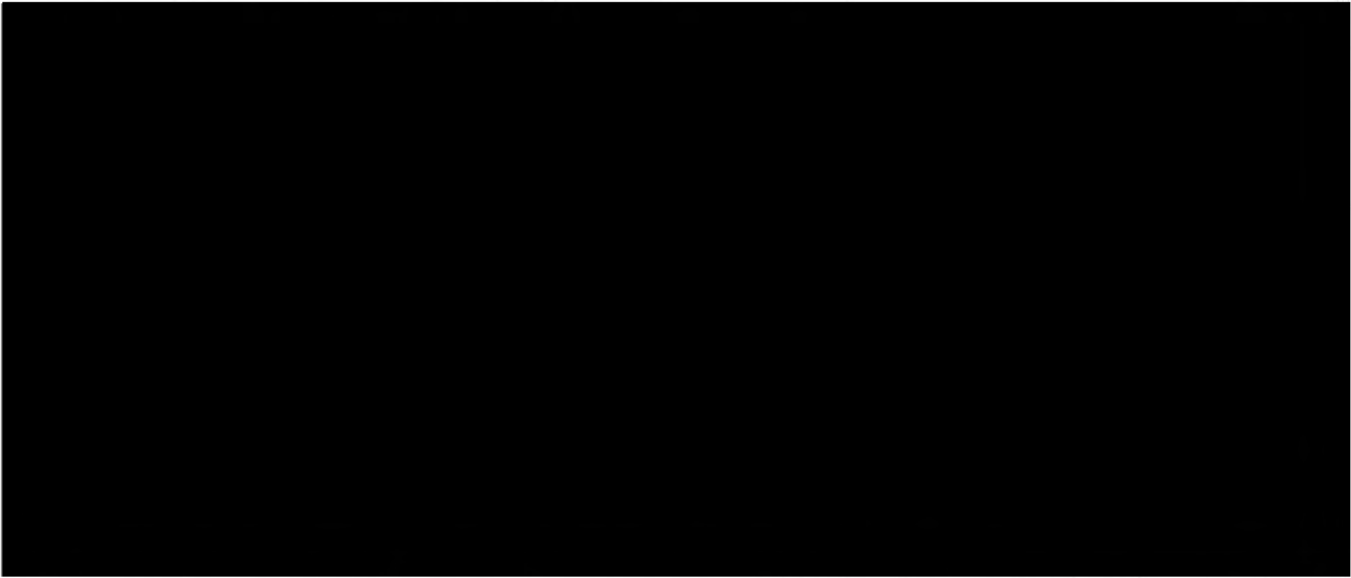
Provide a thorough description of how the Applicant will contribute to economic & business development, tourism & community relations, and the promotion of charitable causes in the Commonwealth. Including:

- a. Creating partnerships for any community, economic development, and tourism opportunities with local or regional entities including but not limited to the Massachusetts Office of Business Development, Chambers of Commerce, Regional Tourism Councils, and the Massachusetts Marketing Partnership

PointsBet is exploring exciting opportunities to create partnerships that will contribute to economic and business development, tourism and community relations, and the promotion of charitable causes in the Commonwealth of Massachusetts.



b. Plans, measures, and steps the applicant intends to take to avoid any negative impact on the revenues currently generated by the Massachusetts State Lottery, including cross-marketing strategies and increasing ticket sales



c. Promoting local businesses, including restaurants, hotels, and retail outlets

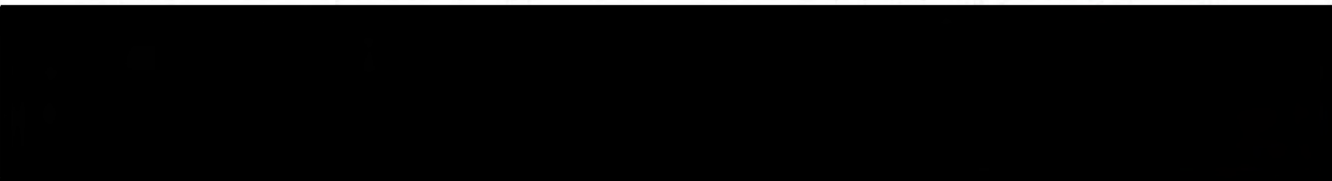
PointsBet has and will continue to explore opportunities to work with and support local, Massachusetts businesses across the state that align with PointsBet's target demographic to bring mutual benefit to PointsBet, the customers, and the respective local business(es). Considerations for local business opportunities include but are not limited to



d. Cross-marketing with live entertainment venues and/or attractions

PointsBet has opportunities with existing professional league partnerships to sponsor and promote marquee league events, including those that take place in Massachusetts. PointsBet also seeks opportunities to provide premium and exclusive experiences for new or existing clients, including hospitality at entertainment venues and local attractions across the state.

PointsBet believes that gambling should be enjoyed as a safe form of entertainment, presenting an opportunity for alignment with live venues and attractions.





PointsBet works with local establishments and businesses with the objective of providing the best experience possible for PointsBet customers and prospects while driving awareness, foot traffic, and affinity for our partner venues.

e. Supporting any community enhancements being incorporated at the local level

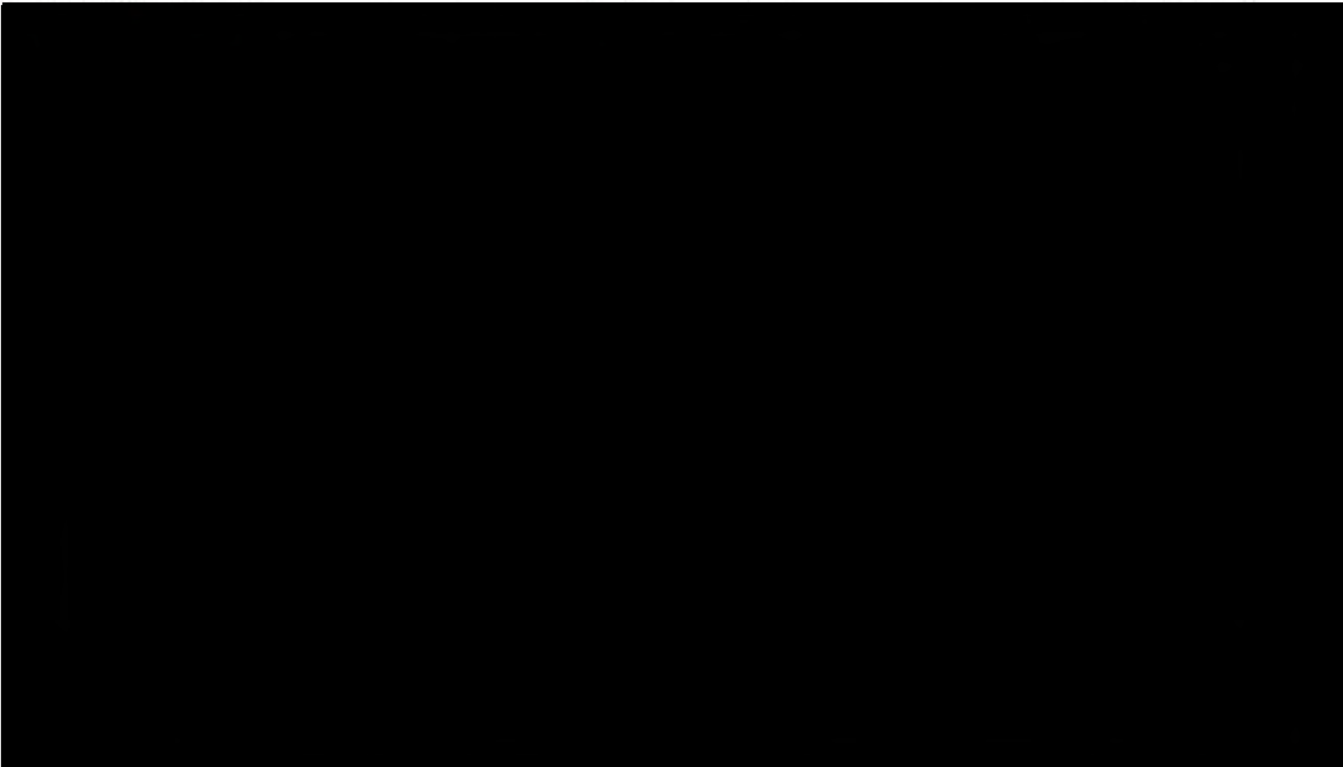
As an untethered, mobile operator PointsBet is limited in the physical impact that PointsBet can make in communities, but PointsBet always looks for opportunities to do so.

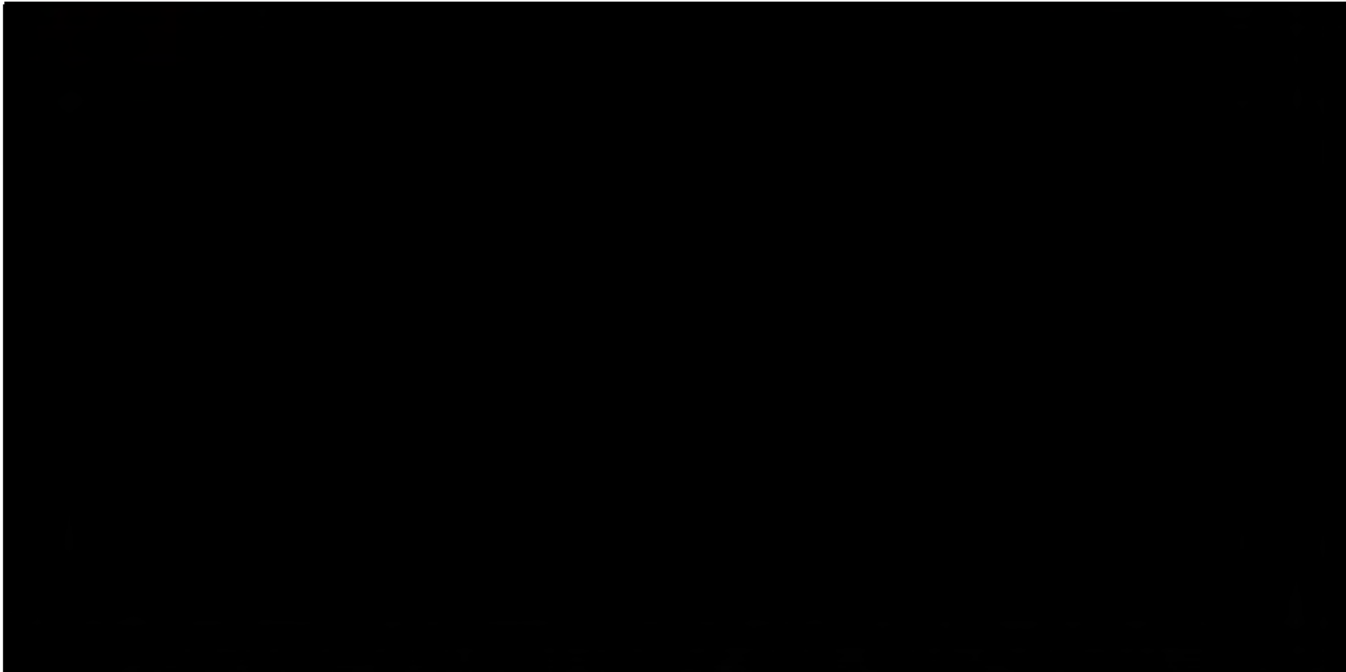
PointsBet's official partnership with NBC (inclusive of local NBC owned TV stations NBC Boston, NBC Sports Boston, and New England Telemundo) affords us with an opportunity to support and bolster local community events/efforts affiliated with the owned stations, as appropriate to our category.

For example, some local community efforts in other states that PointsBet has supported include the March of Dimes in New York, Denver Oilfield Curling Tournament benefiting A Precious Child and Problem Gambling Coalition of Colorado Annual Golf Tournament.

PointsBet dedicates a percentage of annual budget to responsible gambling and corporate social responsibility initiatives.

f. Highlighting unique business and marketing strategies to draw new revenues from new customers

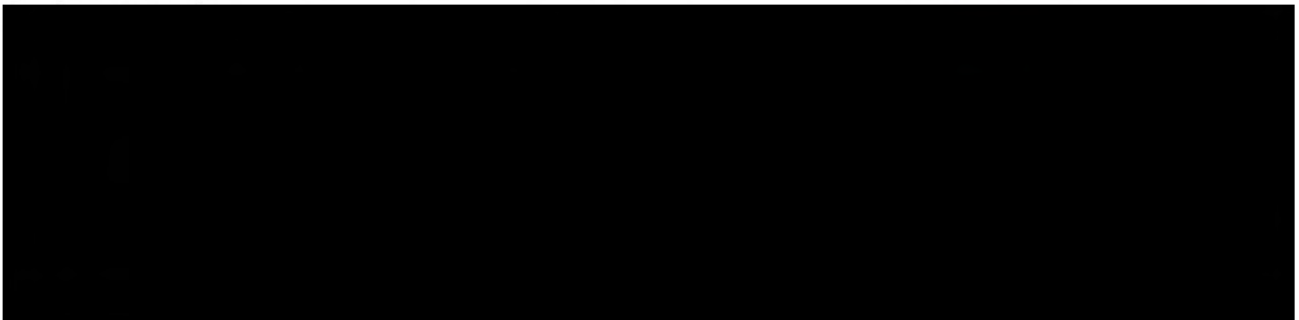




D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

- a. Applicant’s current diversity, equity, and inclusion team – please include the name and title of those individuals currently identified as part of the diversity, equity, and inclusion staff/team, as well as a copy of their location on the applicant’s organizational chart

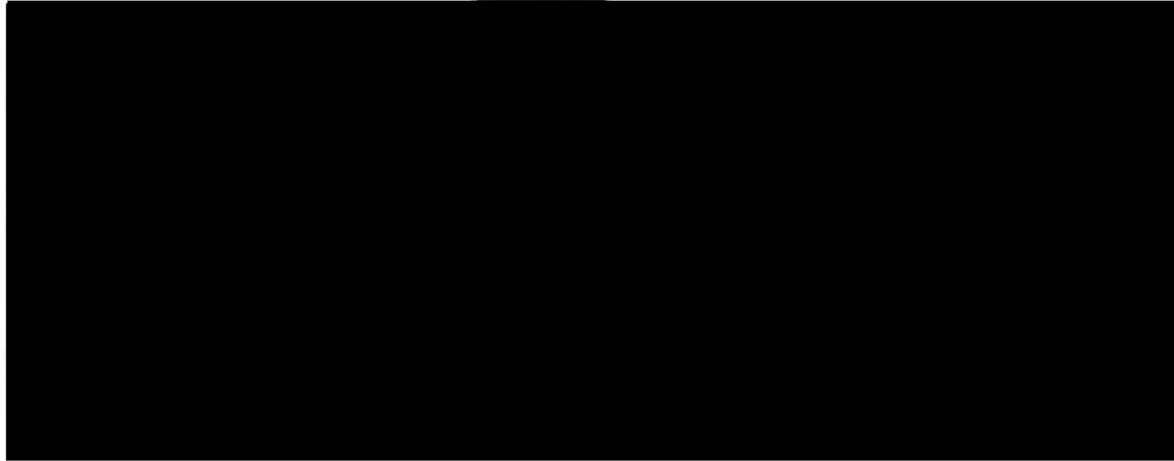
The current diversity, equity, and inclusion team at PointsBet include (positions in organizational chart are highlighted below):



HUMAN RESOURCES

USA
CEO

Johnny Altken



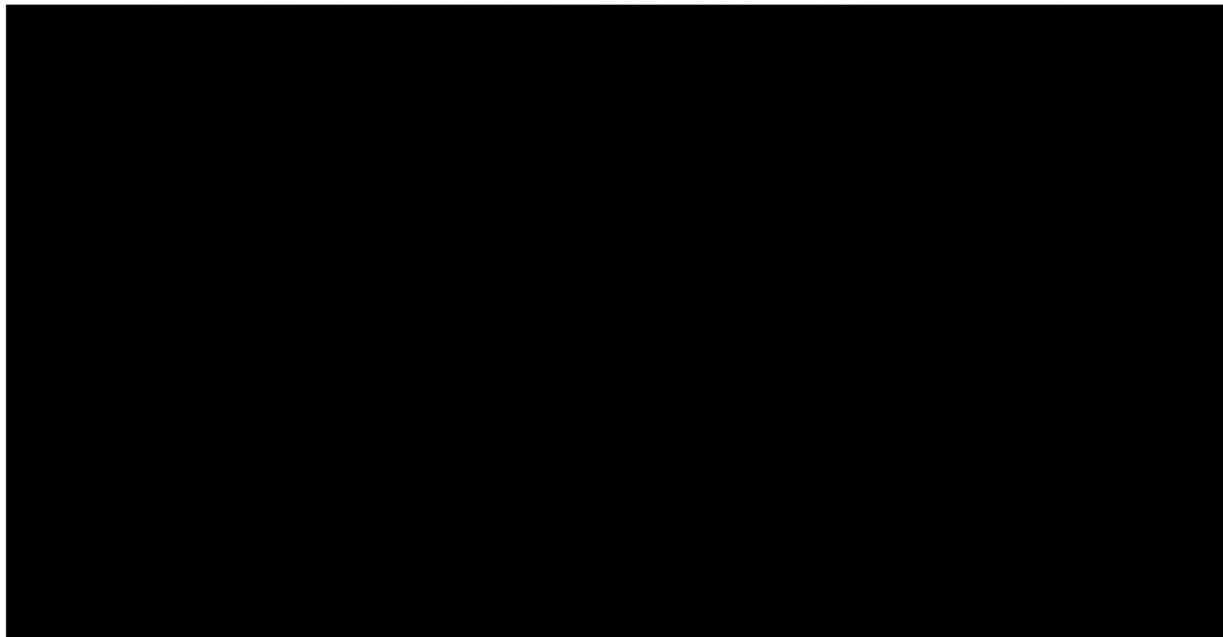
b. Applicant's workforce diversity, equity, and inclusion policy

PointsBets's global workforce diversity, equity, and inclusion policy is available on PointsBet's investor relation's website through this link: <https://investors.pointsbet.com.au/corporate-governance/>. As well as attached to the application as **D1-b-01 PBH Diversity Policy.pdf**.

Please also see an overview of PointsBet's Corporate Social Responsibility programs, including Diversity, Equity and Inclusion initiatives, published on the ASX and, attached as **D1-b-02 PointsBet ESG report.pdf**.

c. Workforce demographics, demonstrating the applicant's current workforce diversity

PointsBet's current workforce diversity statistics for US-based personnel are listed below:



d. Efforts to be made to cultivate workforce diversity, equity, and inclusion by identifying, recruiting, and hiring minorities, women, persons with disabilities, and veterans

PointsBet's plan to increase diverse employment and business participation is three-fold:

1. We proactively identify minority, women, veterans, and disabled person-owned businesses to bolster our supplier base in areas that support our operational, educational, advertising, and marketing efforts.
2. Our Internal Committee for Culture and Communications has initiated procedures to streamline and bring awareness to procurement opportunities.
3. Our Corporate and Technical Talent Acquisition Teams are continuously exploring and implementing new sourcing tools to ensure the diversity of hiring pools.

Additionally, our Corporate and Technical Talent Acquisition Teams use various sourcing methods and websites to recruit diverse candidates for all open roles. This includes LinkedIn, Built In, and our partnerships with the University of Colorado and Women in Sports Tech (WiST) to post open roles.

e. Memberships and/or intentions for joining any local, regional, state, and/or national organizations committed to the development and promotion of diversity, equity, and inclusion initiatives

PointsBet is excited to explore additional opportunities within the Commonwealth that would be available if awarded a license to operate as an untethered mobile operator. Throughout its global operations, PointsBet is an active contributor in community groups.

In 2022, PointsBet has a particular focus in supporting different traditionally under-represented groups within the sports industry, with plans to continue expanding this support across a range of sporting endeavors. Some of the current initiatives include:

- Sponsorship of Sydney FC Charitable Foundations power chair football (soccer) programs; and
- Partnering with Women in Sports Tech (WiST) to increase opportunities for women in sports.

In addition, PointsBet is associated with the Women's Chamber of Commerce and The Denver Change of Commerce.

Also, during our 2022 fiscal year, PointsBet has made donations totaling \$500,000 to Hampton and Norfolk Universities in Virginia, which are HBCU (Historically black colleges and universities) to support scholarships for women in technology.

As part of a market access deal with Austin FC for the State of Texas, PointsBet donated \$100,000 to the 4ATX Foundation, This is in addition to \$75,000 donated to the University of Colorado.

PointsBet also donated \$10,000 to the Nota Begay Foundations supporting Native American community health, and another \$50,000 was donated to WiST, established to drive growth opportunities for women, at the intersection of sports, technology and innovation.

PointsBet's is proud of the contributions it has made to develop and promote diversity, equity, and inclusion initiatives. PointBet's ongoing organizational goals are outlined below. Please see PointsBet's FY2022 Sustainability Report for further information.



OBJECTIVE AND KEY RESULTS



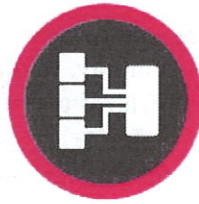
WORKFORCE

Build high performance team that is reflective of the key characteristics of a diverse company.



WORKPLACE

Create workplace that is diverse, inclusive, equitable and ensures our ability to provide each employee with the professional opportunities and personal support they desire.



SUPPLIER DIVERSITY

Promote the growth of the communities we work and serve through intentional partnership with MBE, WBE, VET and DBE companies and service providers.



MARKETPLACE

Connect to customers and business partners through our diversity and inclusion.

DIVERSITY, EQUITY & INCLUSION

With operations in Europe, North America, Asia and Australia, PointsBet employs a diverse workforce.

In FY22 the Group made a sizeable investment in DEI a cornerstone of which was the hiring of a dedicated Vice President of DEI, establishment of the new DEI Board and an Internal Culture & Communications Committee.

The DEI Board consists of PointsBet executives supported by several prominent external members with expertise in diversity and professional. The Internal Culture & Communications Committee is comprised of 10 PointsBet employees charged with serving as an internal planning team and as ambassadors for the Group's efforts related to DEI.

Initiatives championed during FY22 included

- Cultural Day celebrations.
- Implementation of a DEI focused education series.
- Establishment community partnerships with women-in-tech organisations.
- International Women's Day celebration in all offices.
- Domestic & Family Violence policies reviewed and updated including by introducing new paid leave support.
- Increased parental leave entitlements, and
- The introduction of forums for women including a Women-at-PointsBet group.

FY23 GOALS

PointsBet will continue its commitment to people in FY23 with continued talent mapping and succession planning.

Among other initiatives, PointsBet plans to continue the evolution of its DEI program and explore new ways for building employee resilience.

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

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



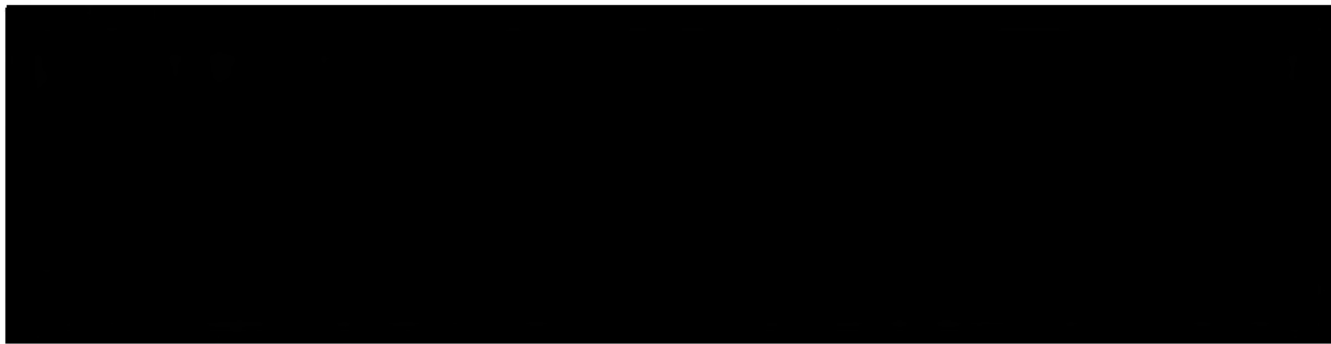
- a. Minority-owned business enterprises
- b. Women-owned business enterprises
- c. Veteran-owned business enterprises

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

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

In PointsBet's 2022 Fiscal Year, the total spend on Minority-owned, Women-owned, and Veteran-owned business enterprises was \$1,600,474.00.

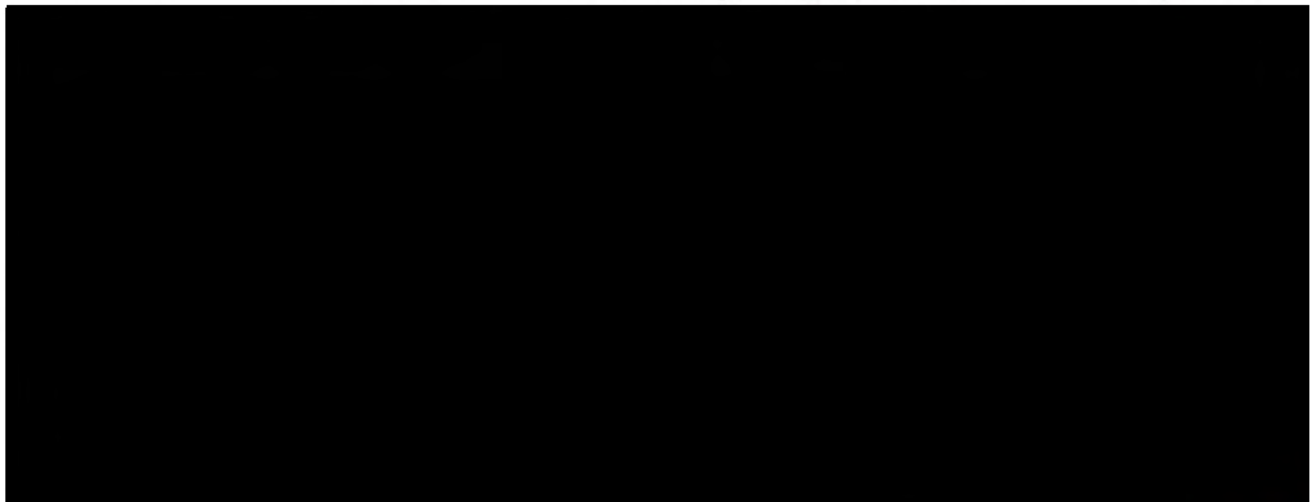
The most significant opportunity for ongoing increased participation will be in advertising and marketing. We are currently examining existing contracts and discussing our partners to inform them of our commitment to Minority, Women, and Veteran-owned business enterprises firms and request spend reports to assess subcontractor opportunities. An outline of PointsBet's plan to alert and encourage potential vendors to seek business from the licensee is:



D.3 DIVERSITY, EQUITY, & INCLUSION – CORPORATE STRUCTURE Provide a thorough description of the Applicant's commitment to diversity, equity, and inclusion initiatives in the Commonwealth. This should include:

- a. The makeup of the Applicant's ownership, leadership, and governance structure, – including minorities, women, and veterans in positions of leadership throughout the corporate structure

PointsBet's current leadership position statistics for US-based personnel are below:



b. How the Applicant intends to create joint ventures with corporate partners and/or partnerships with local or regional entities, including but not limited to programs, non-profit organizations, and agencies, dedicated to establishing a welcoming and inclusive experience for all patrons, users, and employees in the Commonwealth

PointsBet has already engaged Massachusetts-based Issues Management Group to explore joint ventures and other business relationships with local or regional entities, especially programs, non-profit organizations, and agencies establishing a welcoming and inclusive experience for all patrons, users, and employees in the Commonwealth.

Issues Management group and PointsBet have engaged in multiple conversations about relationships that would benefit PointsBet and the local community. Specifically, PointsBet is exploring opportunities with local food banks, the Friends of Boston Homeless, and other non-profit organizations. PointsBet will continue to work with and explore opportunities and joint ventures with local and regional entities if given the opportunity to operate and continue to operate in the Commonwealth.

E.1 RESPONSIBLE GAMING POLICIES

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

The PointsBet Responsible Gambling Plan is a collection of procedures and strategies aimed to prevent and reduce gambling-related harms and ensure that operations are consistent with regulatory and community expectations. Where relevant, evidence is used to design and implement strategies, which are rooted in the theory of informed decision making. The PointsBet responsible gambling strategy seeks to:

1. Ensure that gambling is enjoyed by customers strictly as a form of entertainment.
2. Utilize messaging touchpoints throughout the customer journey which aim to prevent gambling-related harms and normalize healthy play.
3. Intervene when players demonstrate lack of gambling control and ensure that tools and support resources are clearly communicated.

PointsBet acknowledges that problem gambling is a true addiction with serious societal implications. Execution and periodic review of the Responsible Gambling plan is managed by the responsible gambling team with oversight from executive staff.

a. Commitment to corporate social responsibility

PointsBet views responsible gambling as foundational to good corporate citizenship with demonstrated awareness of harms caused by gambling as well as prevention and mitigation measures. Relevant issues are addressed with integrated policies, strategy, and culture-related measures.

The responsible gambling team works closely with all departments to ensure that unique business functions are optimized to support responsible gambling. Responsible and problem gambling is regularly addressed in organization-wide communication including email and town hall presentations.



The responsible gambling team engages with both the global and US responsible gambling committees which include interdepartmental representation and participation by executive leadership. The responsible gambling team further meets with the Chief Executive Officer and a Non-Executive Board Member monthly.

PointsBet's 2022 Sustainability report may be publicly accessed via the corporate webpage: [2022 Sustainability Report](#)

b. Support positive play

PointsBet recognizes that gamblers exist on a continuum ranging from recreation to severe gambling addiction. To support positive play and ensure that patrons have the information required to make informed decisions about their play, PointsBet incorporates responsible gambling touchpoints throughout the entire user journey in accordance with user experience (UX) design principles. While user journeys vary by state due to regulatory nuances, a standard user journey includes:

Account Creation-Consumer protection begins at the point of account creation through a robust KYC process which validates player identity, age and location. Account creation screens include a problem gambling helpline message as well as confirmation checkboxes that the individual is of legal gambling age and not prohibited from gambling due to voluntary self-exclusion.

Account Creation Email-Patrons who are successfully verified and create an account receive a responsible gambling email within one-hour of account creation. This message includes healthy gambling tips and a link to visit the responsible gambling page.

Responsible Gambling Page-The dedicated responsible gambling page can be accessed at any point during the user journey via the main menu, bottom left footer menu, or footer link. This page contains PointsBet's stance on responsible gambling, healthy gambling tips, state-specific treatment resources and a link to a problem gambler screener.

Limit setting tools are also accessible on this page and at minimum include:

- **Deposit Limit:** Manage maximum amount deposited on a daily, weekly or monthly basis
- **Spend Limit:** Control total spend on a daily, weekly, or monthly basis
- **Cool Off:** Take a break from PointsBet for -3, -7 or -30 days
- **Time Limit:** Control the amount of time spent on PointsBet
- **Withdrawal Cancellation:** Block the ability to cancel pending withdrawals
- **Stop Loss Adjuster:** Control potential max wins and losses *before* placing a Pointset
- **Activity Statement:** Review up to 24 months of deposits, withdrawals, bet placement and limit setting history

Up to three limits may be set at a given time and are effective immediately. Limits may not be changed until the player has reached the end of their pre-selected period. Approximately half of Massachusetts players who were surveyed as part of the 2020 Positive Play Study (Wohl and Tabri) reported that they would find online responsible gambling tools useful within the online environment.

In-App-Messaging-Users receive in-app-messages upon reaching certain loss thresholds which vary by customer age. This in-app message reminds users to play responsibly and drives recipients to visit the responsible gambling page. Recipients of this message are required to close out of the message or visit the responsible gambling page to resume play.



Monthly Email-All users receive a monthly responsible gambling email that includes healthy gambling tips and a link to visit the responsible gambling page.

Social Media-PointsBet posts a daily responsible gambling message during highest-traffic hours.

VIP Onboarding-As part of a personalized onboarding welcome-text message, VIP customers receive a responsible gambling message from their account manager.

Platinum Onboarding-As part of personalized onboarding welcome email, Platinum customers receive a responsible gambling message.

Ad-Hoc Identification-Customers receive information about responsible gambling if they exhibit a responsible gambling red flag. Communication is personalized as needed and format (email, phone call, SMS text) is determined by the responsible gambling team. Patrons may chat into 24/7 customer service should they have questions related to responsible gambling or concerns about problem gambling. Customer service is also trained to provide assistance to third parties who reach out to report a concern related to an account holder.

The 2020 Positive Play Study (Wohl and Tabri) reported that half of Massachusetts players surveys scored low to medium on gambling literacy. In support of gambling literacy, PointsBet includes an “i” Icon next to each sports bet which includes information about the rules and odds. PointsBet further maintains a “Sportsbetting 101” page which includes information about odds, bet types and how to place a wager.

c. Promote public health and safety

Consumer protection begins at the point of account creation through a robust KYC process which validates patron identity, age and location. Account creation screens include a problem gambling helpline message as well as confirmation checkboxes that the individual is of legal gambling age and not prohibited from gambling due to voluntary self-exclusion. Patrons may not open more than one account in a single state. Further, patron location is monitored via geolocation software which blocks users who travel outside of state lines from placing a wager on their state-specific account.

PointsBet provides patrons with the ability to voluntarily self-exclude from gambling for a predetermined length of time. In compliance with regulatory requirements, PointsBet offers patrons the ability to immediately block access to their account for a short period of time via the “cool-off” tool or via site-specific voluntary self-exclusion for a period of 1 or 5 years. PointsBet supports statewide voluntary-self exclusion programs and can direct patrons to appropriate exclusion page according to regulator specifications.

A link to the responsible gambling page as well as the problem gambling helpline number are accessible on every main screen throughout the user journey. Visiting the responsible gambling page allows patrons to access limit setting tools and support resources.

PointsBet does not offer house credit to patrons.

d. Ensure responsible advertising and marketing

General

PointsBet includes responsible and/or problem gambling messaging on all advertising. Patrons who wish to block promotional messaging may do so by clicking “unsubscribe” at the footer of any email message and “blocking” our profile on any social media platforms. Patrons who enter voluntary self-exclusion or who



request closure of their accounts are automatically removed from all email marketing. PointsBet does not utilize text or pop-up advertising.

In line with PointsBet ethical standards, individuals who are below the age of 25 years old, voluntarily self-excluded, or at a known higher risk of gambling related harm are not targeted with promotional advertising. Further care is taken to design ads which do not directly appeal to minors, such as by not including cartoon graphics or featuring individuals who appear to be below the legal gambling age.

In September 2022 PointsBet removed the term “risk-free” from all sportsbook advertising and promotions.

Social Media

PointsBet complies with digital and social media platform gambling and general advertising policies which may be accessed below:

[Twitter Policies](#)

[Facebook Policies](#)

Digital Advertising

PointsBet complies with Google gambling advertising policies inclusive of online gambling and location-based gambling. Ads are only shown to users in regions where gambling is legal and advertisers must (1) not target users under 21 or users outside of the state(s) where they are licensed, and (2) include a warning against the dangers of addictive and compulsive gambling and related assistance information on the landing page or in the creative.

[Google Advertising Policy](#)

Patrons who reach out to PointsBet regarding gambling advertising restrictions on Youtube and Google are directed to ad blocker support articles which may be accessed here:

[Google Support Answer](#)

[Google Support Article](#)

PointsBet Generated Digital and Live Content

PointsBet continues to identify new ways to incorporate responsible gambling messaging and problem gambling disclaimers into digital and live content with the goal of normalizing healthy play and increasing awareness of gambling related harms. Through media partnership with NBC Sports Chicago and NBC Sports Philadelphia, PointsBet incorporates live reads of responsible gambling messaging into “Betcasts” live game broadcast. Messages include responsible gambling tips and a reminder to parents that gambling is not suitable for children.

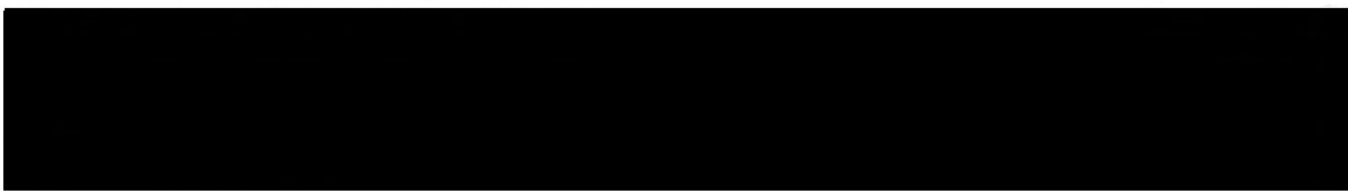
e. Manage high-risk financial transactions

PointsBet encourages patrons to view their account history which is easily accessible from the main menu. Up to 24-months of account history including deposits, bets and responsible gambling limits may be viewed in-app or downloaded to a CSV file which contains the problem gambling helpline number.



PointsBet encourages users who may be struggling to control their gambling to explore blocking software such as Gamban which blocks access to all online gambling operators on up to twelve personal devices. Financial control instruments are accessible through certain banking institutions who allow for blocking of specific merchants.

PointsBet does not offer house credit to patrons.



f. Engage the community

PointsBet offers 24/7 customer service support to handle patron questions, comments, or concerns in a timely manner.

Customer-facing team members are trained to direct patrons to regulatory bodies should they wish to submit a formal complaint about gaming operations. This information is also accessible to patrons within the app itself on the Player Protection page. Employees wishing to voice concerns or questions related to problem gambling may reach out to the Manager of Responsible Gambling and Corporate Social Responsibility.

In August 2022, PointsBet launched an anonymous employee survey through an independent third-party to evaluate responsible gambling policies, practices, and procedures. An anonymous player survey was launched at the same time and completed by 2,286 customers.

To support gambling literacy, PointsBet includes an “i” Icon next to each sports bet which includes information about rules and odds. PointsBet further maintains a “Sportsbetting 101” page accessible to the public which includes information about odds, bet types and how to place a wager. Verified patrons as well as members of the public may reach out to the customer service team 24/7 for questions related to betting, responsible and/or problem gambling.

PointsBet is a member of the National Council on Problem Gambling and regularly engages state and national experts within academia and the public health/advocacy community to ensure that best practices within responsible gambling are offered. PointsBet is pleased to offer knowledge exchange sessions to organizations interested in learning about online wagering.

PointsBet believes that collaboration with organizations specializing in responsible and/or problem gambling results in the best outcomes for individuals who live in the communities in which we operate. Maintaining transparent ongoing dialogue is critical in mitigating gambling related harms and in reaching individuals at higher risk of gambling addiction.

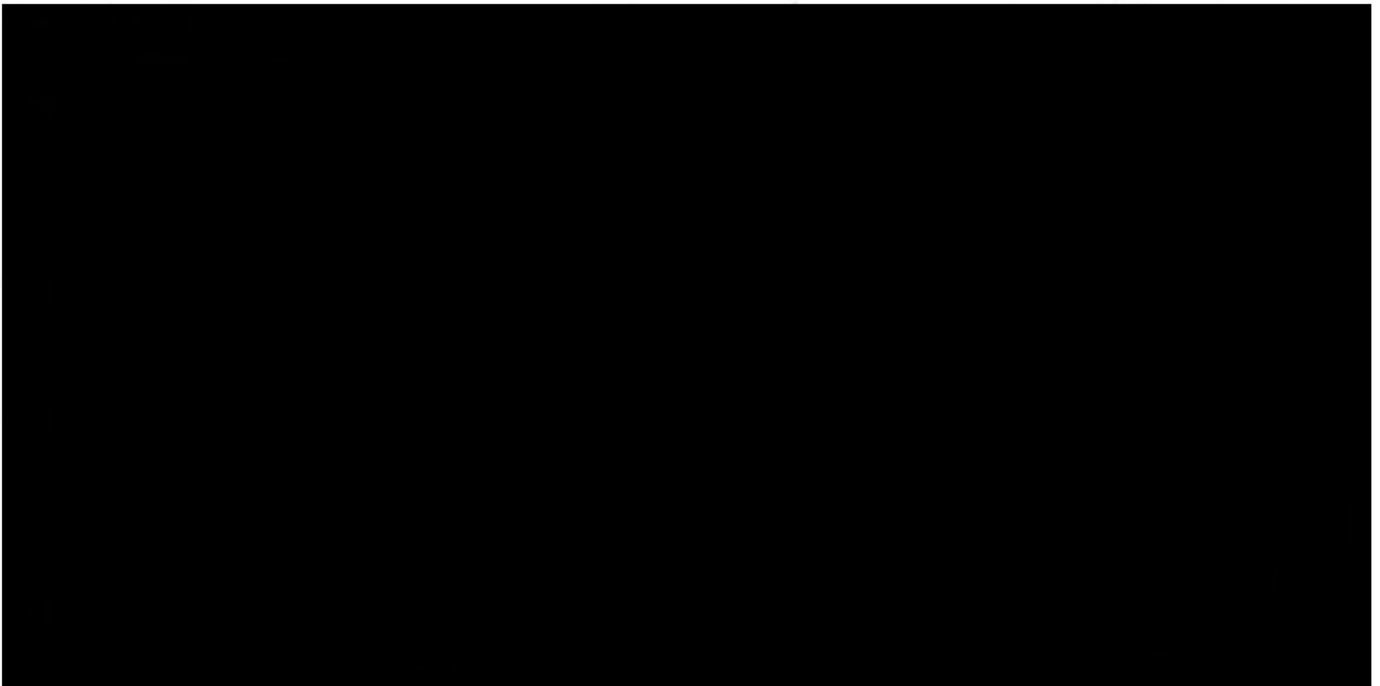
g. Commitment to improvement and reporting

PointsBet records all customer interactions related to responsible and problem gambling and is pleased to participate in responsible gambling research which utilizes findings to strengthen practices. PointsBet regularly provides data to regulators such as uptake of limit setting tools and responsible gambling page visits. PointsBet will continue to collaborate with the research community to remain up to date on best practices and understand the impacts of gambling.





c. Advertising plans



d. Measures to ensure that marketing reaches the target audience and not underage or vulnerable populations

PointsBet looks to ensure that all marketing efforts are targeted. PointsBet applies state supplied self-exclusion lists whenever possible to ensure vulnerable parties are not being exposed. All marketing efforts specifically target or are purchased against adults who are 21+. Additionally, across all marketing efforts responsible gaming hotlines and information are included-so that any individual seeking assistance can easily access it.

e. Player acquisition models – specify minimum age to participate

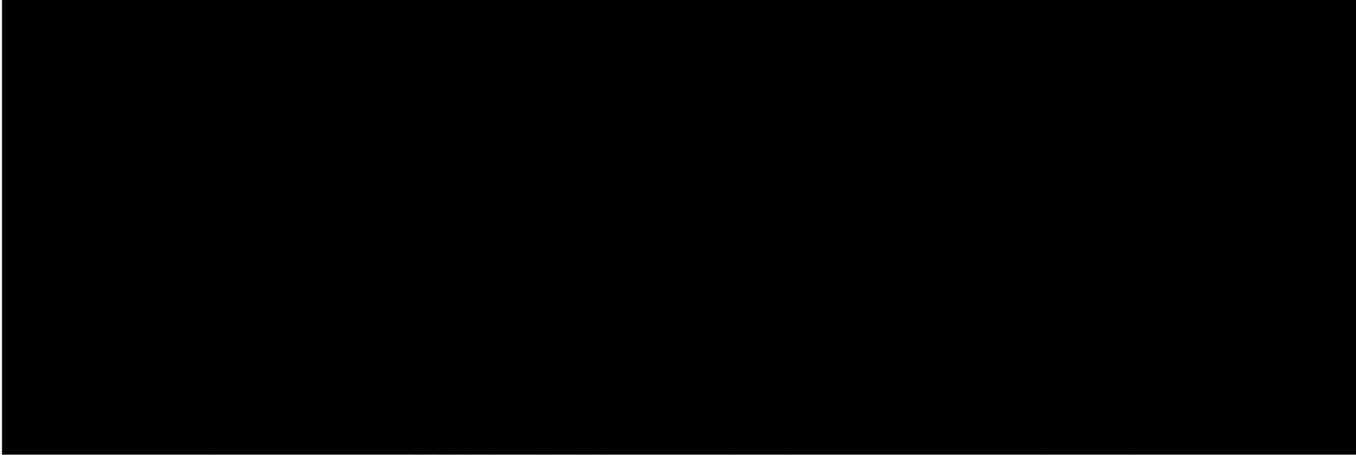
Any individual who is signing up or taking advantage of a promotion from PointsBet must be 21 years of age. There are no exceptions across the PointsBet platform.

f. Plans to incorporate responsible gaming and problem gambling information

PointsBet ensures that all required responsible gaming messages and information is on advertisements and promotions. Also, please see section E.1 – Responsible Gaming Plan, which addresses PointsBet’s approaches to the promotion and advertising responsible gaming and problem gambling information throughout our Responsible Gaming plan.

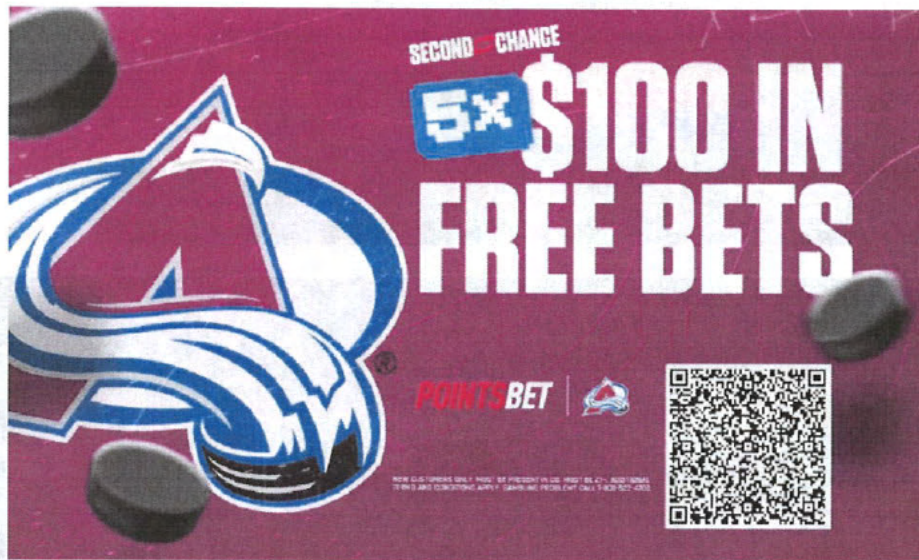
g. Strategies for converting those customers wagering via unlicensed or illegal means to wagering legally in the Commonwealth





h. Examples of marketing, advertising, and promotional materials/activities recently used in other jurisdictions

Below are some creative examples of ads/offers PointsBet runs. There are a mix of sport specific, team specific and general offers. Additionally, there is an image from our BetCast in October on the NBC Sports Chicago RSN.



x5 \$100 RISK FREE BETS

NBC Sports | POINTSBET

SIGN UP NOW



NEW CUSTOMERS ONLY. MUST BE PRESENT IN IL. RESTRICTIONS APPLY. TERMS AND CONDITIONS APPLY. © 2020 POINTSBET. ALL RIGHTS RESERVED.



POINTSBET

POINTS BET | peacock

SECOND CHANCE

5x \$100 IN FREE BETS

+ 3 MONTHS OF PEACOCK

SIGN UP NOW

GAMBLING PROBLEM? CALL 877-6-HOPENY OR TEXT HOPENY (467369) IN NY

Sports | POINTSBET

OFFICIAL SPORTS BETTING PARTNER

SECOND CHANCE

5x \$100 IN FREE BETS

SIGN UP NOW

GAMBLING PROBLEM? CALL 877-6-HOPENY OR TEXT HOPENY (467369) IN NY

POINTS BET SECOND CHANCE

5x \$100 IN FREE BETS

SIGN UP NOW

POINTS BET | TROON

T&C'S APPLY. VOID WHERE PROHIBITED. MUST BE 21+. GAMBLING PROBLEM? CALL 1-800-GAMBLER FOR CRISIS COUNSELING AND REFERRAL SERVICES

<p>PACERS VS BULLS</p> <p>SPREAD IND +12</p> <p>MONEY LINE IND +550 CHI -800</p> <p>O/U 237 PTS TO OVER 173</p> <p>POINTS PROPS</p> <table border="1"> <thead> <tr> <th></th> <th>O/U</th> <th>GAME</th> </tr> </thead> <tbody> <tr> <td>Z. LAVINE</td> <td>21.5</td> <td>9</td> </tr> <tr> <td>N. VUCEVIC</td> <td>17.5</td> <td>11</td> </tr> <tr> <td>T. HALIBURTON</td> <td>19.5</td> <td>5</td> </tr> <tr> <td>B. MATHURIN</td> <td>17.5</td> <td>6</td> </tr> </tbody> </table> <p>NBA CHAMPION</p> <table border="1"> <tbody> <tr> <td>BOS</td> <td>+600</td> </tr> <tr> <td>GS</td> <td>+600</td> </tr> <tr> <td>LAC</td> <td>+600</td> </tr> <tr> <td>MIL</td> <td>+700</td> </tr> </tbody> </table>		O/U	GAME	Z. LAVINE	21.5	9	N. VUCEVIC	17.5	11	T. HALIBURTON	19.5	5	B. MATHURIN	17.5	6	BOS	+600	GS	+600	LAC	+600	MIL	+700	<p>27 - 38 FOULS: 0 TO 5 FOULS: 0 TO 7 2nd 11:41 :12</p>
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<p>POINTS BET</p> <p>LIGHTNING BET Who scores point 70? Bulls -115 Pacers -115</p>																								

E.3 HISTORY OF DEMONSTRATED COMMITMENT



POINTS BET SPORTSBET

POINTS BET SPORTSBET

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

a. Promote responsible gaming within the gaming establishment or mobile application and in the community

PointsBet incorporates responsible gambling touchpoints throughout the entire user journey in accordance with user experience (UX) design principles. While user journeys vary by state due to regulatory nuances, a standard user journey includes:

Account Creation-Consumer protection begins at the point of account creation through a robust KYC process which validates player identify, age and location. Account creation screens include a problem gambling helpline message as well as confirmation checkboxes that the individual is of legal gambling age and not prohibited from gambling due to voluntary self-exclusion.

Account Creation Email-Patrons who are successfully verified and create an account receive a responsible gambling email within one-hour of account creation. This message includes healthy gambling tips and a link to visit the responsible gambling page.

Responsible Gambling Page-The dedicated responsible gambling page can be accessed at any point during the user journey via the main menu, bottom left footer menu, or footer link. This page contains limit setting tools (time, spend, deposit, etc.), state-specific treatment resources a link to problem gambler screener.

In-App-Messaging-Users receive in-app-messages upon reaching certain loss thresholds which vary by customer age. This in-app-message reminds users to play responsibly and drives recipients to visit the responsible gambling page. Recipients of this message are required to close out the message or visit the responsible gambling page to resume play.

Monthly Email-All users receive a monthly responsible gambling email that includes healthy gambling tips and a link to visit the responsible gambling page.

Social Media-PointsBet posts a daily responsible gambling message during highest-traffic hours.

b. Assist patrons and users that are experiencing gambling-related harm

Assisting patrons who are at risk of, or experiencing gambling-related harms, is tracked via an internal database, and monitored by the responsible gambling team. Responsible gambling assistance is triggered by two primary processes:

Behavioral Surveillance-The patron database is reviewed weekly by the responsible gambling team for evidence-based risk factors indicative of at-risk or problematic play behavior.

Ad Hoc (Chat) Identification- Patron communication including live chat, text, email, phone and social media is monitored for language indicative of lack of gambling control. Patrons who are identified via this method are responded to with support resources and are escalated to the responsible gambling team for further review.

Upon identification of patrons experiencing gambling-related harms, the responsible gambling team determines any follow-up actions ranging from a responsible gambling email or two-way communication via phone call or text message. PointsBet reserves the right to shut down patron accounts who they believe are experiencing serious gambling related harms.



All PointsBet staff are required to complete an annual responsible gambling training. Customer-facing staff are required to complete at least one additional training session which details assistance procedures in addition to ongoing engagement with the responsible gambling team. All trainings are developed by the responsible gambling team in accordance with best practices. Patron assistance procedures as outlined within trainings are built on a stepped care approach which utilizes a hierarchy of potential interventions designed for different player groups, ranging from a focus on promoting positive play, to providing access to self-management tools and help resources, to self-exclusion and account closure.

c. Cooperate and support any government or regulatory agencies to promote responsible gaming and/or mitigate gambling-related harm

PointsBet believes that cooperation with regulatory agencies results in the best responsible gambling outcomes for individuals who live in the communities in which we operate. Maintaining transparent, ongoing dialogue with regulators is critical in mitigating gambling related harms and in reaching communities comprised of individuals at higher risk of gambling addiction. PointsBet is pleased to provide data to regulators on various responsible gambling related metrics to help inform policy.

July 2022: PointsBet sponsors the 2022 annual conference of the National Council on Legislators for Gaming States (NCLGS) which included a session regarding NCLGS Responsible Gambling Resolution.

d. List any membership or partnership with an agency or organization whose mission is in whole, or part, dedicated to responsible gaming or problem gambling

PointsBet is a member of the National Council on Problem Gambling and regularly engages state and national experts within academia and the public health/advocacy community to ensure that best practices within responsible gambling are offered.

September 2021: PointsBet engaged EPIC Risk Management to deliver lived-experience training to corporate staff and customized retail training for staff employed at PointsBet brick and mortar sportsbook locations.

In July 2022: PointsBet partners with the National Council on Problem Gambling as well as the Massachusetts Council on Gaming and Health on a research initiative designed to inform online operator decision making regarding patron scenarios related to responsible and problem gambling. [PointsBet x NPGC Research Initiative](#)

October 2022: PointsBet becomes an official member of the Council on Compulsive Gambling of Pennsylvania to help raise awareness and mitigate gambling related harms within Pennsylvania.

e. List any awards or recognition the applicant has received, related to efforts to promote responsible gaming, or mitigating gambling-related harms

November 2020: PointsBet wins Socially Responsible Operator at EGR North America Awards

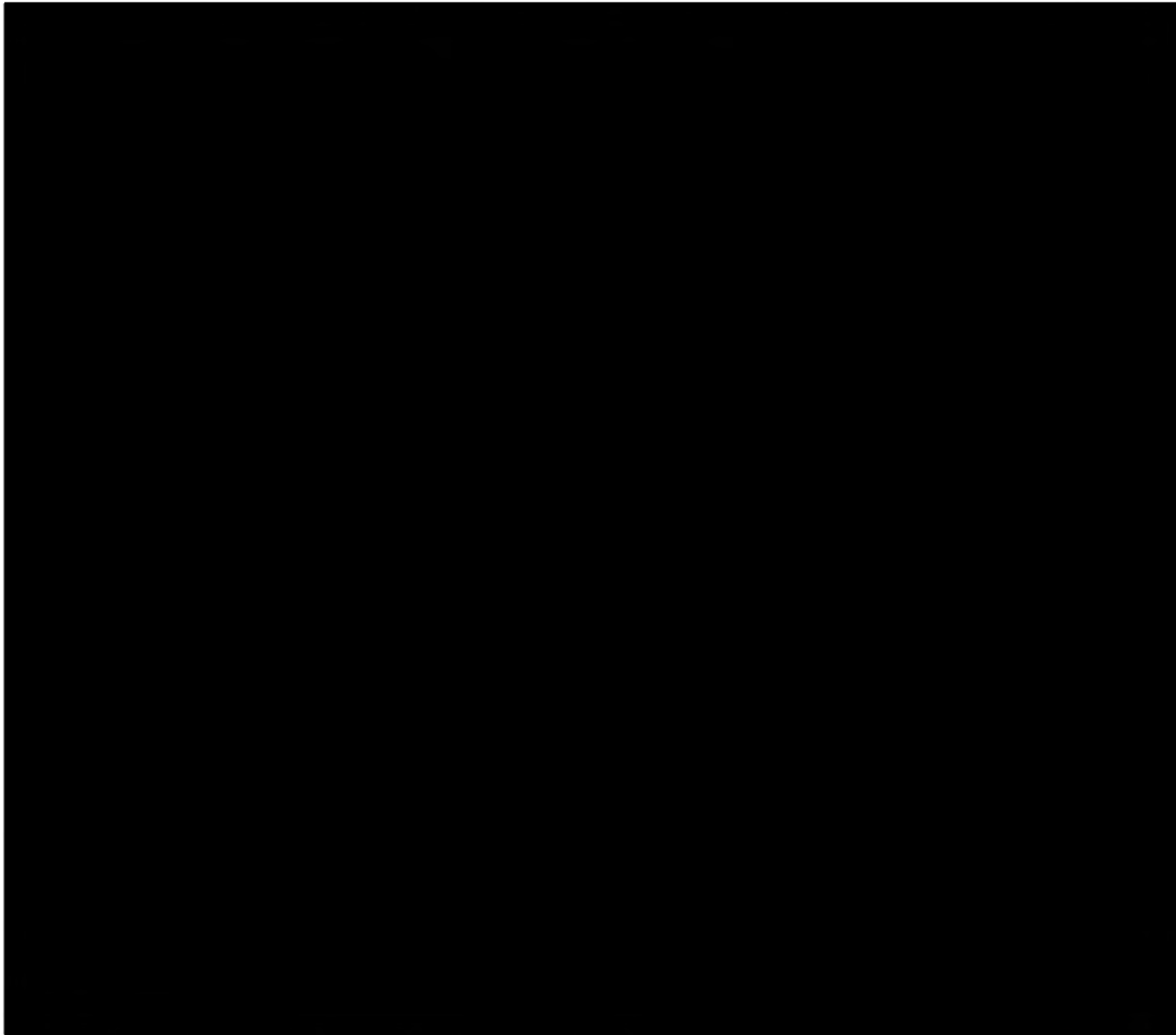
November 2022: PointsBet is actively in the process of receiving RG Check accreditation for US operations through the Responsible Gambling Council. RG Check is the most comprehensive accreditation processes in the world and helps gambling operators evaluate, monitor, and manage all aspects of their RG strategy. To achieve RG Check, an operator must receive a minimum score of 50% for each standard and a minimum overall score of 70% in each of the below categories:

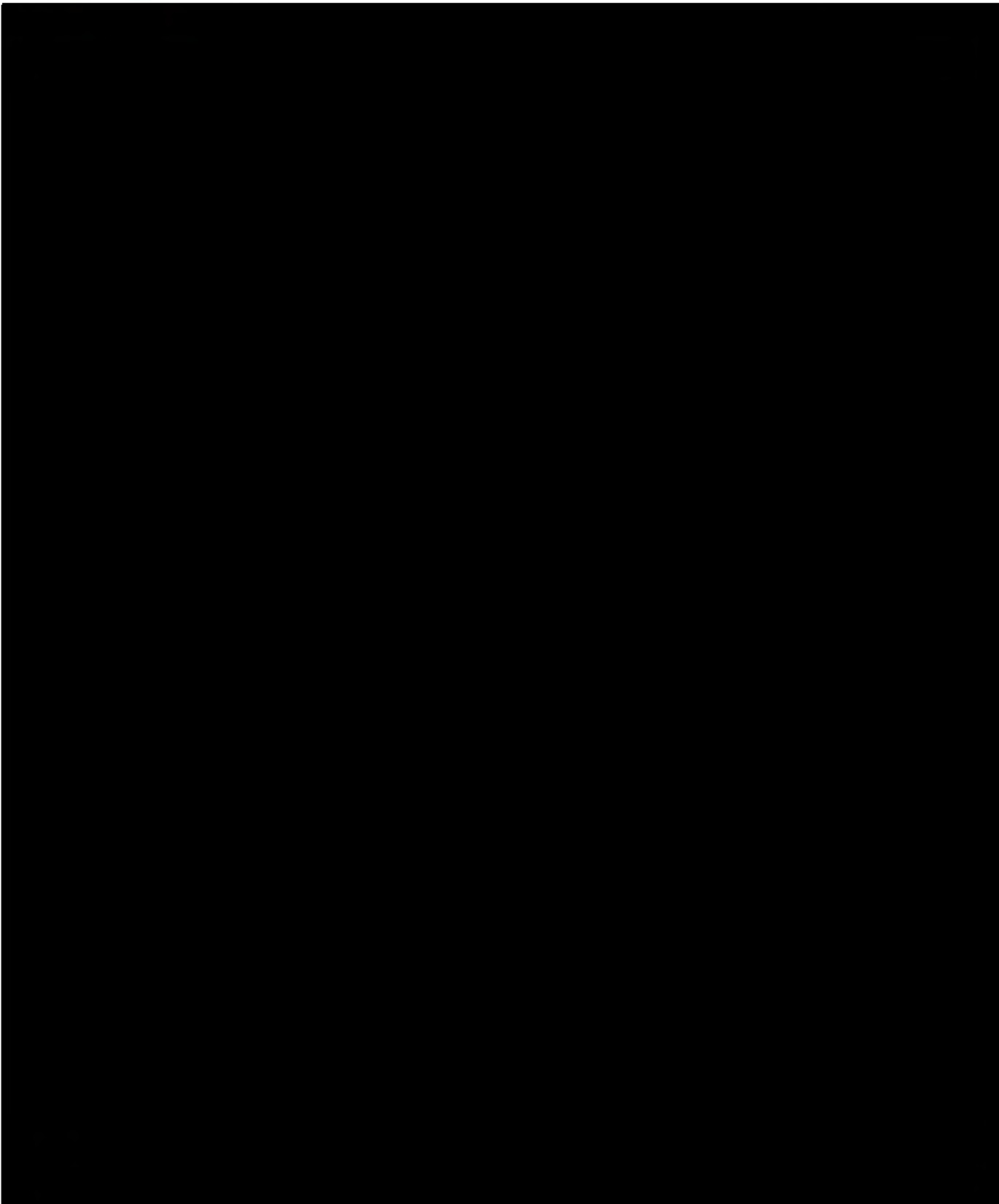
- RG Policy, Strategy and Culture
- Employee Training

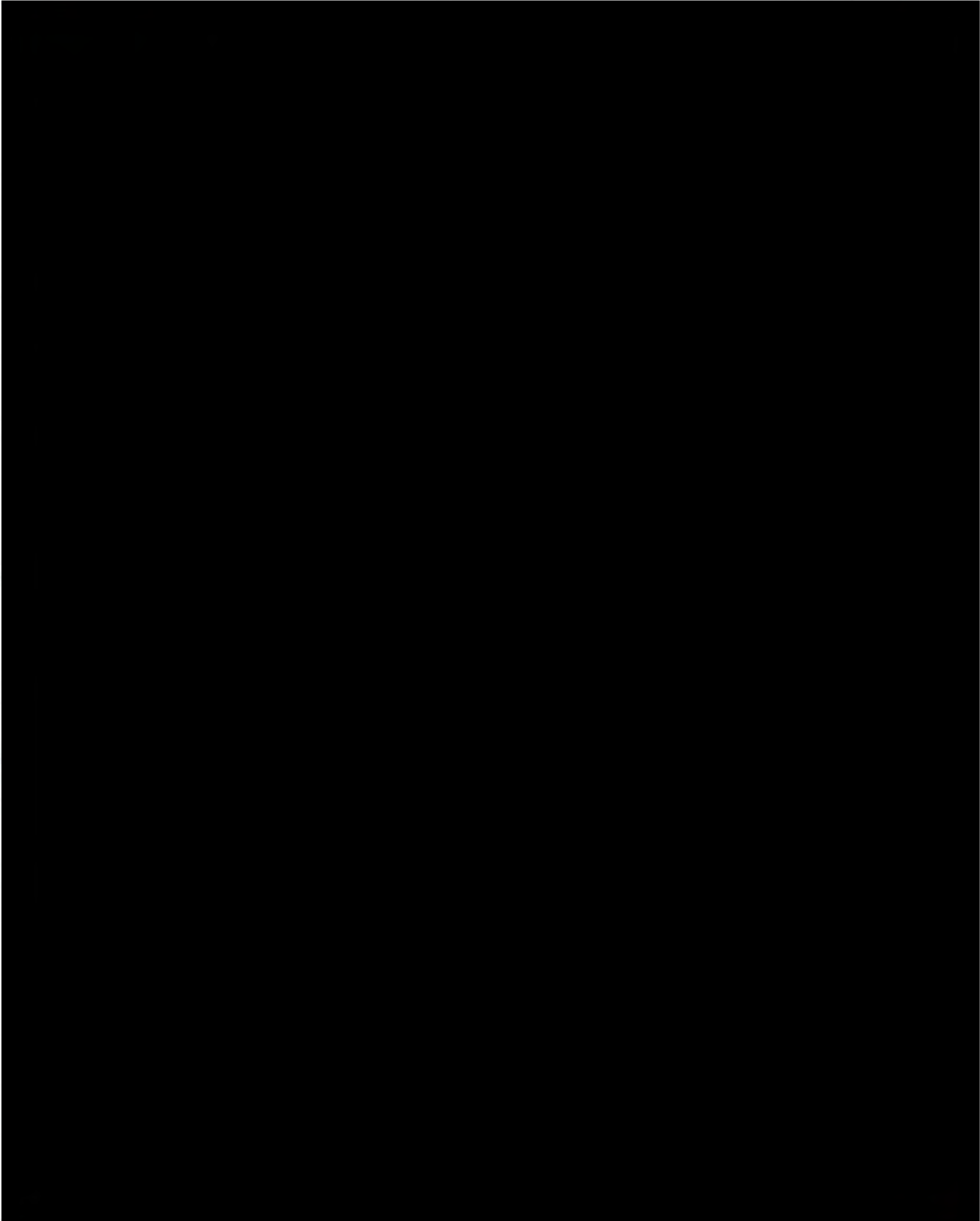


- Self-Exclusion
- Assisting Players
- Informed Decision Making
- Marketing Communications
- Accounts and Payment
- Site and Product Design
- Stakeholder Engagement

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

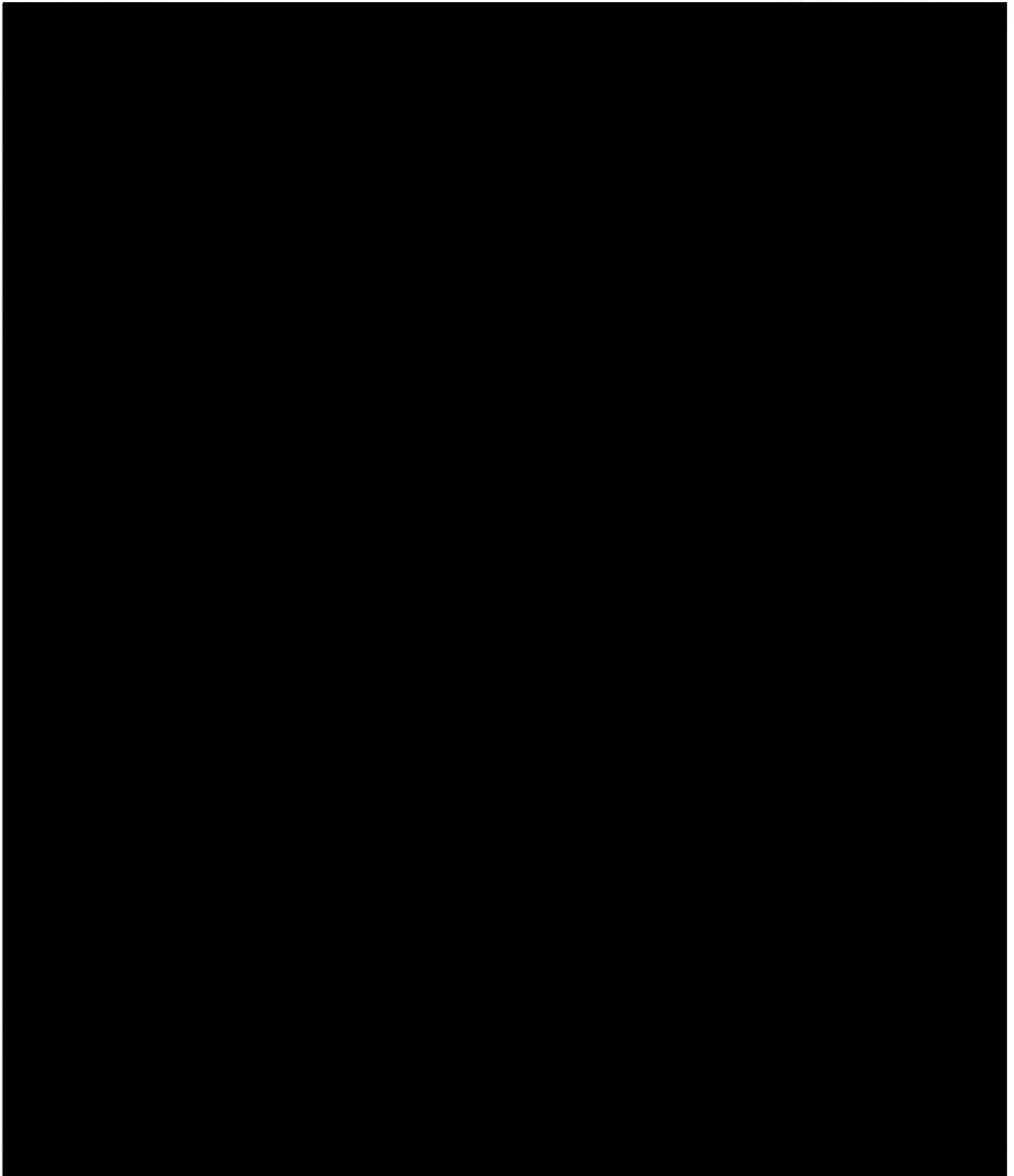






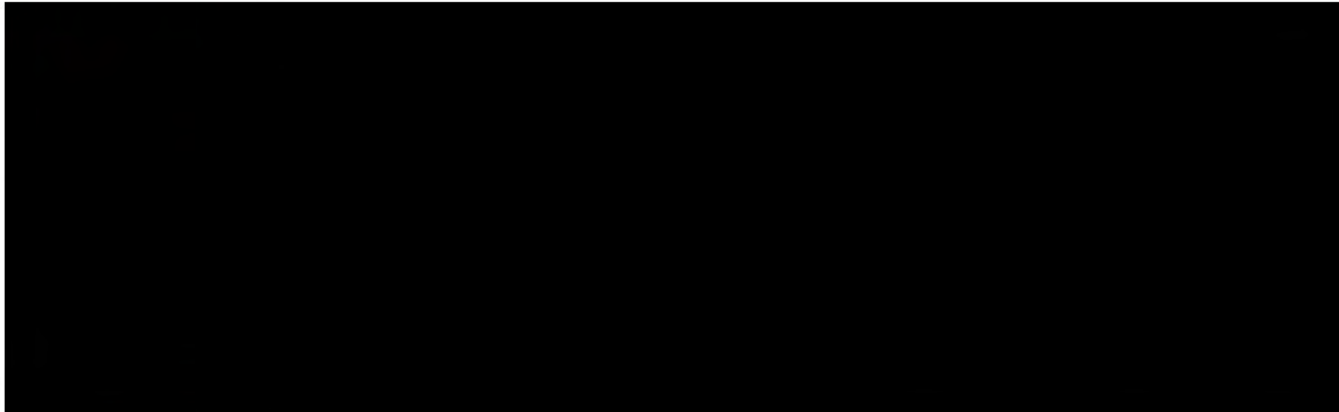
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F.1 GEOFENCING

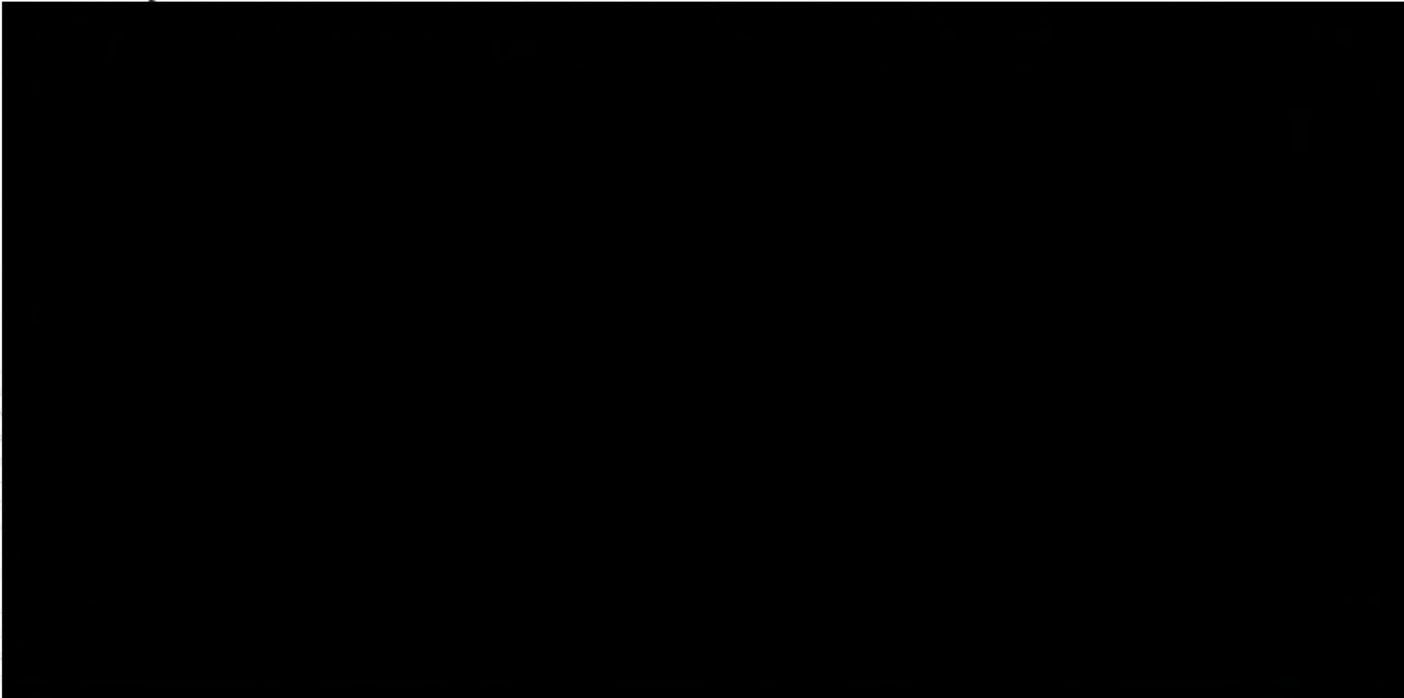
Provide a thorough description of how the applicant will ensure that authorized users placing online sports wagers on their platform are geographically located in the Commonwealth of Massachusetts. This information must include:

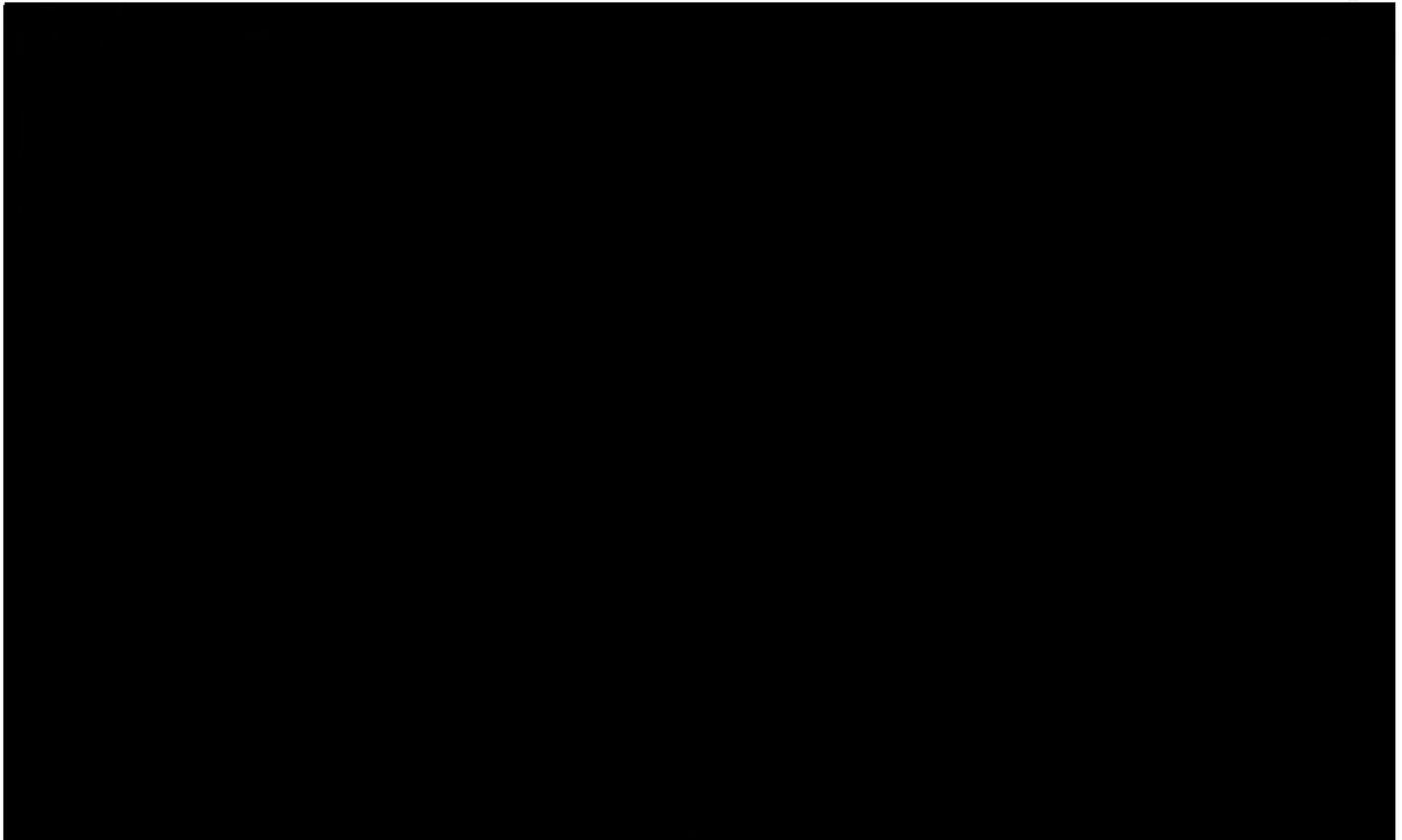
a. Which geolocation system(s) will be utilized to reasonably detect the physical location of an authorized user attempting to place a wager on the platform

PointsBet will use a third-party provider, GeoComply, to detect the physical location of authorized users attempting to place a wager on the platform. GeoComply is a market leader in this space and is the provider PointsBet uses in all other states in which it operates.

b. How the system will:

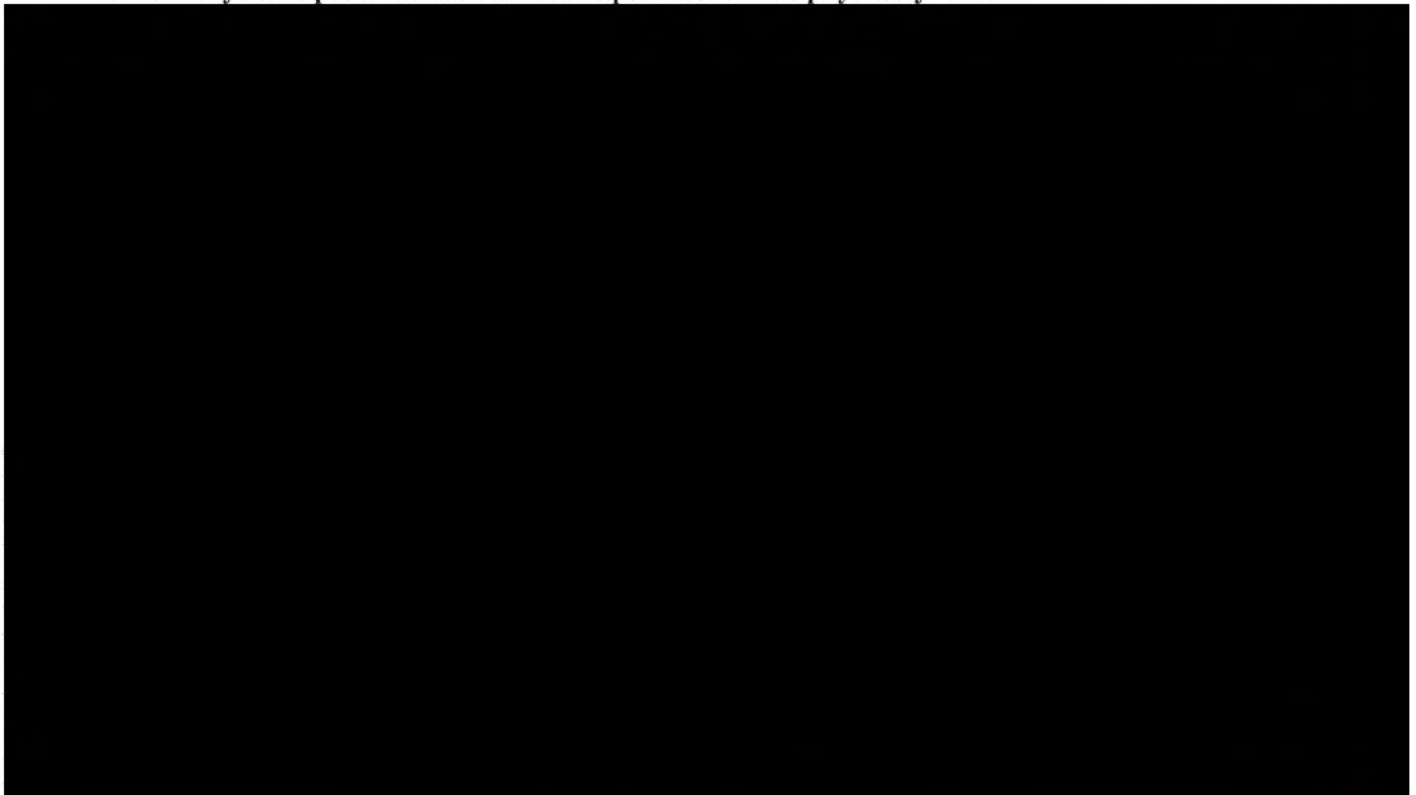
- 1. Accurately detect the physical location of an authorized user attempting to access or place a wager on the platform through accurate location data sources (Wi-Fi, GSM, GPS)**
- 2. Block or deny unauthorized attempts to access the platform, or place a wager, from outside of the Commonwealth**
- 3. Update the IP address and physical location if they change while the user is active on the platform**





b. How the system will:

4. Identify attempts to circumvent the requirement to be physically located in the Commonwealth





c. How the applicant will log information received from the system

PointsBet has custom integrations developed to call GeoComply API to checks for the Player's Location as needed. Geocomply provides the portal for the validated user to download the location verification reports.

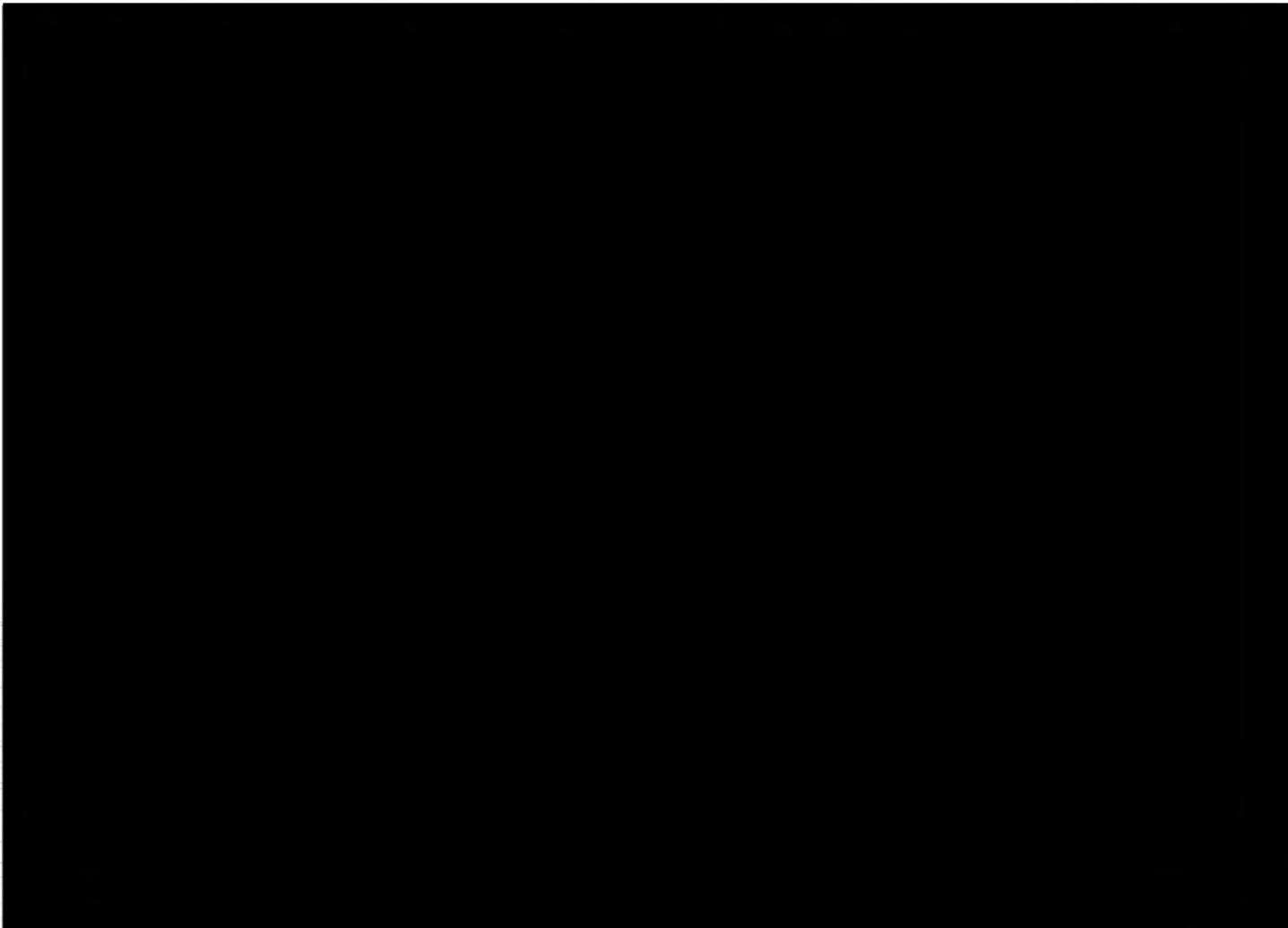
d. How the applicant will report the information received from the system to the Commission

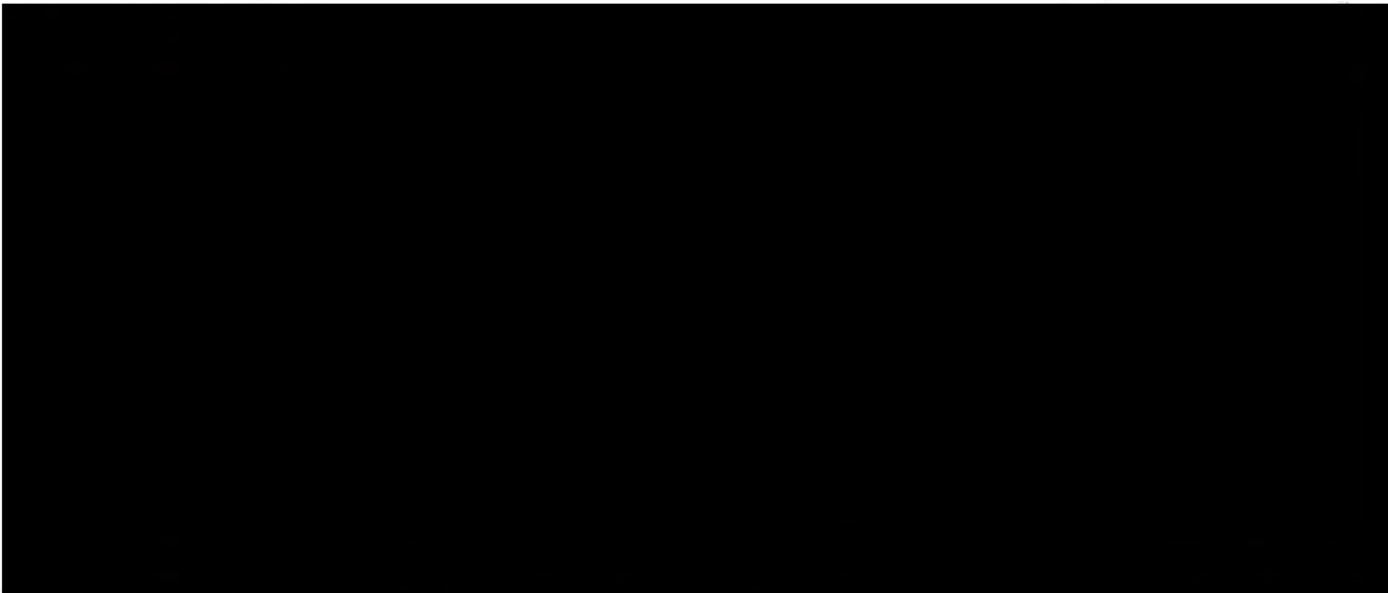
PointsBet uses GeoComply to report to the Commission information received.

GeoComply Geo Location test reports will be provided by GeoComply/GLI as part of PointsBet's initial certification of its application in Massachusetts.

Question F.2: Know Your Customer: Provide a thorough description of how the Applicant will ensure the verification of information provided by users opening a new account on the platform.

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





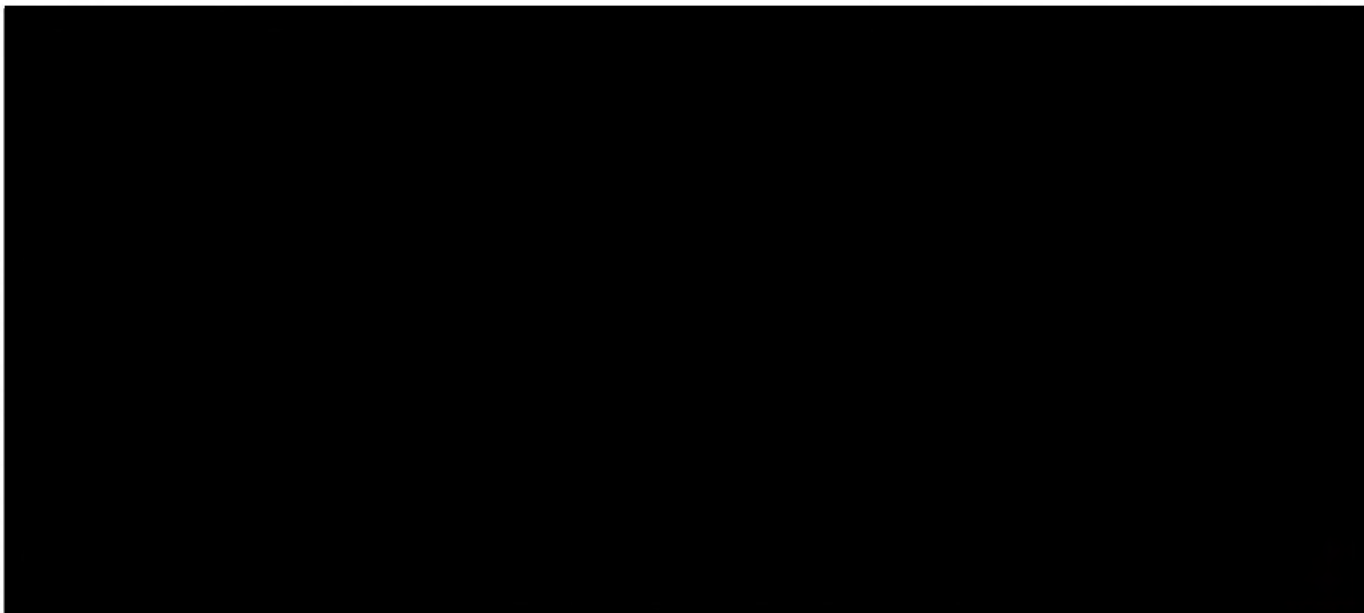
F.3 TECHNOLOGICAL EXPERTISE AND RELIABILITY Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

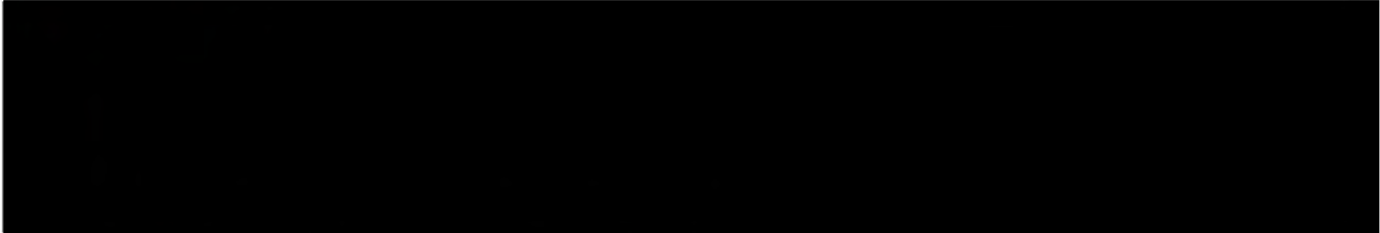
a. Wager acceptance

PointsBet’s purpose-built system and architecture is designed to ensure only permitted wagers, by users physically located in the commonwealth of Massachusetts, are accepted on the servers at the approved gaming facility. PointsBet is committed to work in consultation with the Massachusetts Gaming Commission to comply with any relevant server location or other requirements.

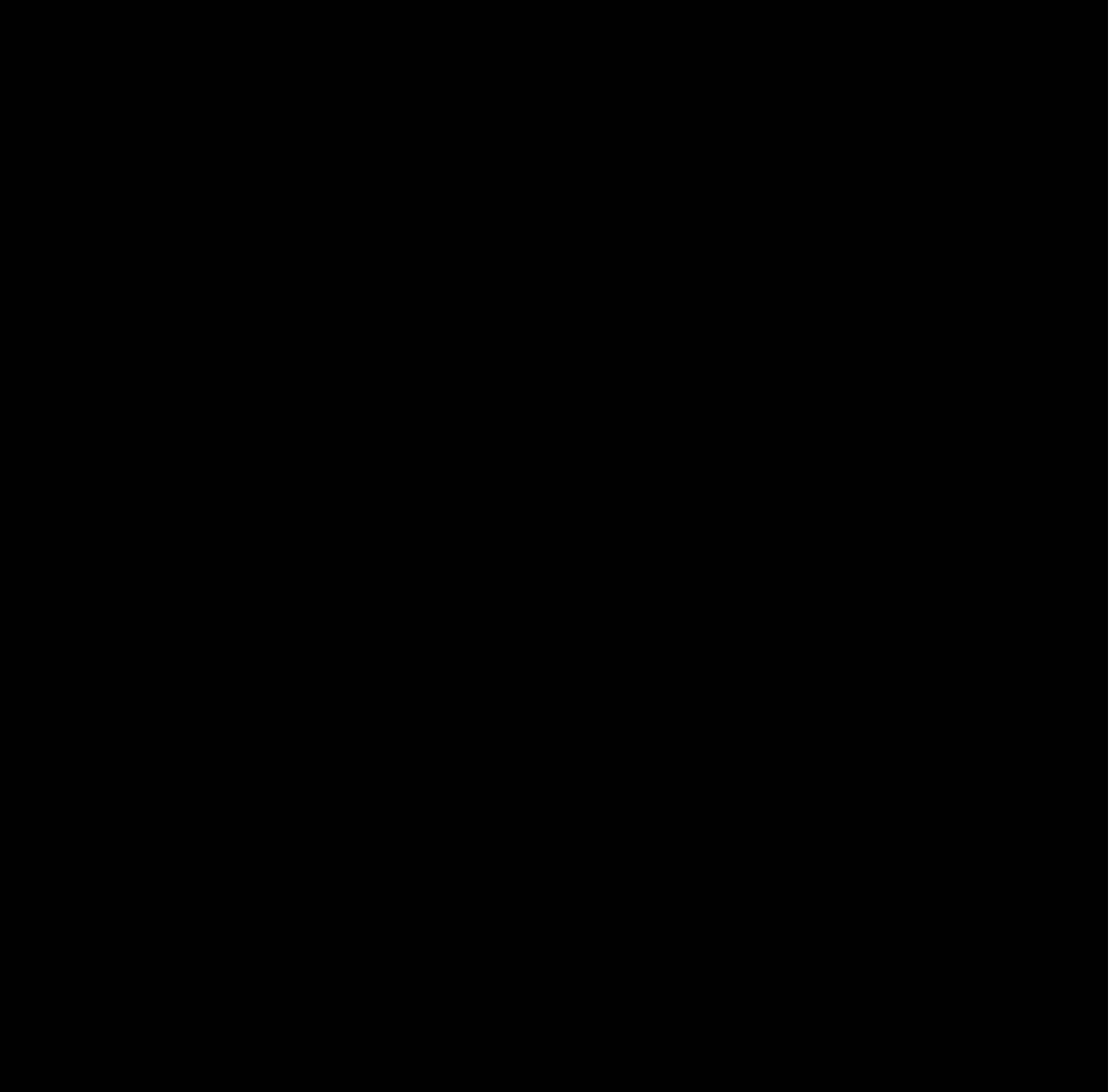
The geolocation aspect of the wager acceptance is performed using software to determine the physical location of the user to ensure they are within state boundaries when placing the wager. PointsBet utilizes third-party geolocation software to augment its internal process for wager acceptance.

b. Systems for monitoring structured wagers, real-time data feed, and any unusual or suspicious wagering activity



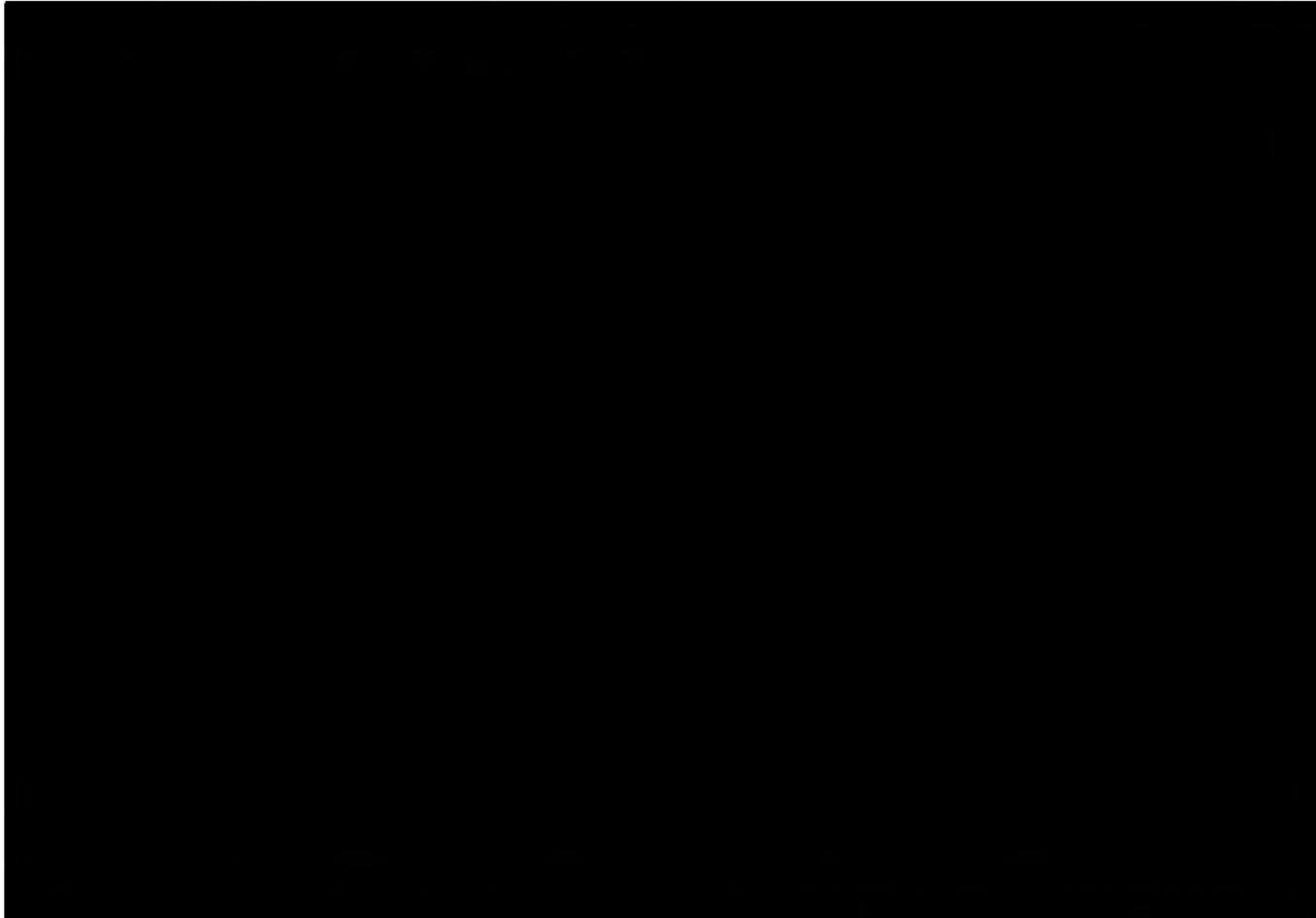


c. Description, location, and periodic testing of servers

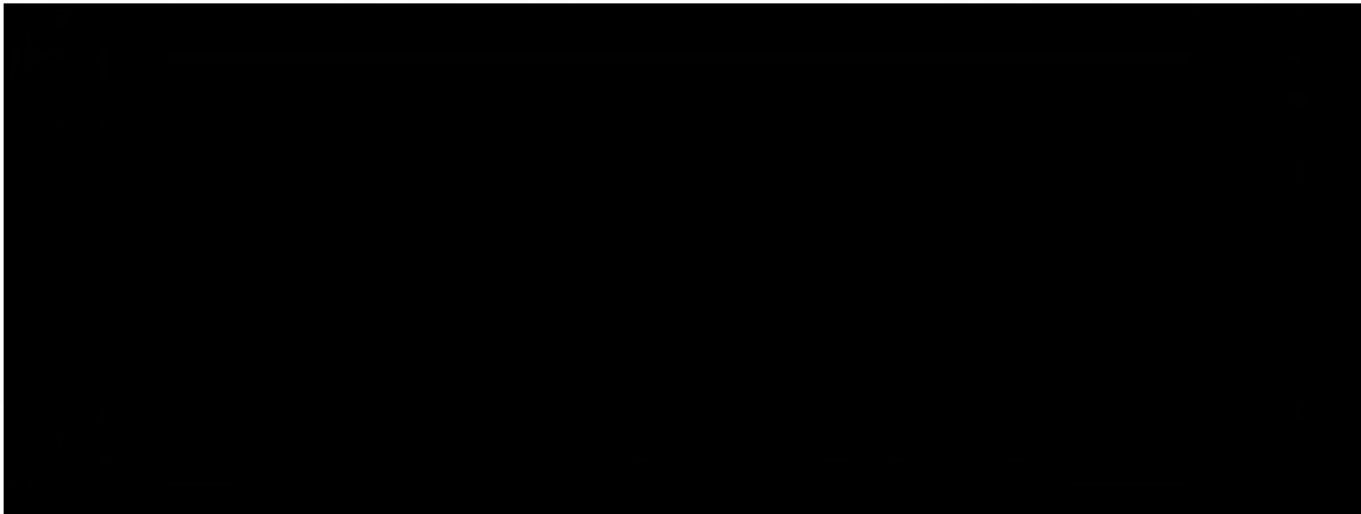


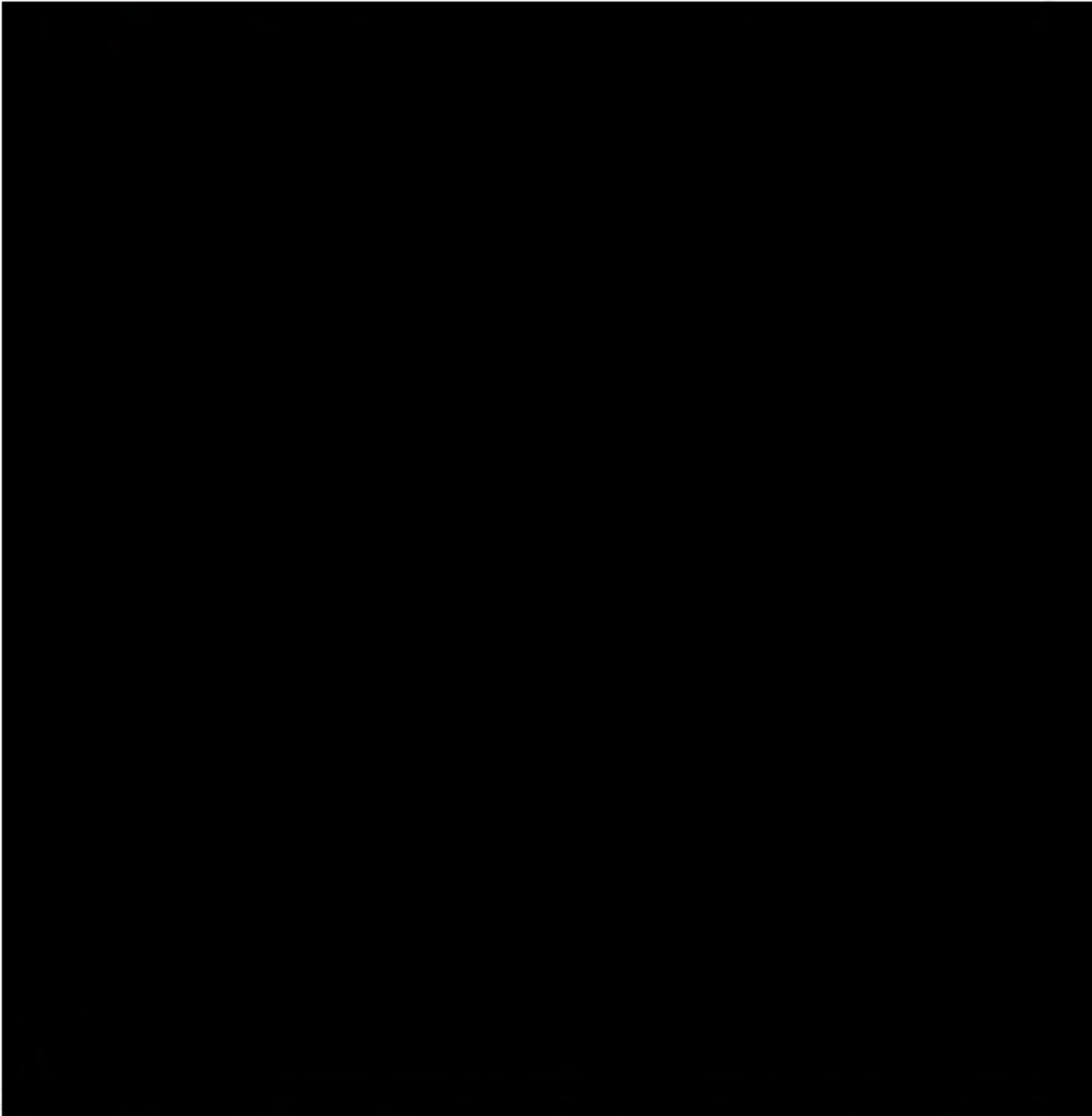


- d. Security of servers, applications, and communications networks and
- e. Security of patron personal and wagering information



- f. Integrity monitoring and reporting, including any current affiliations related to integrity monitoring





G.3 FINANCIAL STABILITY & INTEGRITY

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

- a. Documentation demonstrating the financing structure and plan for the proposal, including all sources of capital. Please include current capital commitments, as well as plan and timing for meeting future capital needs

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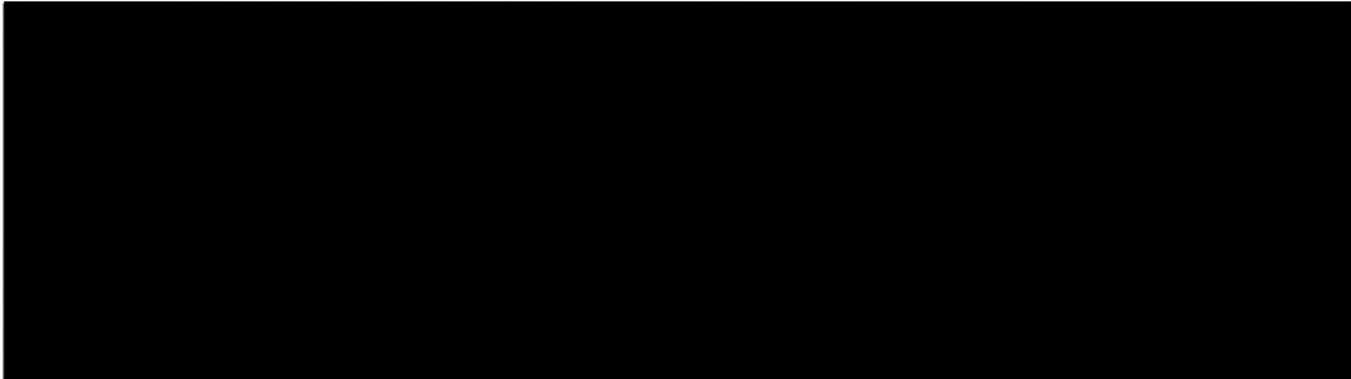


The company is publicly traded on the Australian Stock Exchange and has had periodic capital raises as detailed in Note 21 of the latest financial statements for FY22. As of the most recent quarter ending September 30, 2022 the company has corporate cash on hand of \$412M AUD (~\$263.7M USD) per the 4C filing. Capital commitments are shown in Note 27 of the latest financial statements. The Company has no debt and has no plans for future borrowings. Any additional future capital needs would likely be obtained through capital raise.

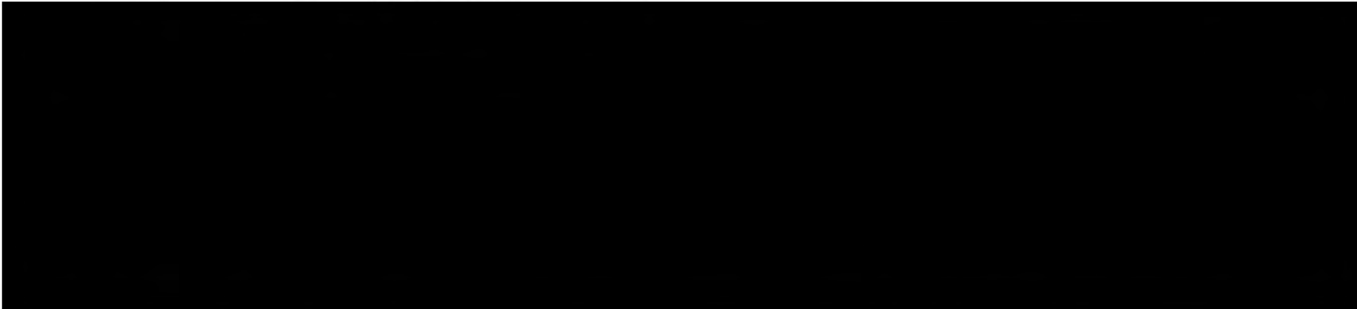
b. A detailed budget of the proposal cost, including any construction, design, legal and professional, consulting, and all other developmental fees. Also identify all other pre-launch costs, including training, marketing, and initial startup capital

N/A

c. An analysis, including best, worst, and average case scenarios, that demonstrates the applicant's plan and capacity for accommodating steep downturns in revenues, and provides examples of those plans and strategies that have been successful in other jurisdictions

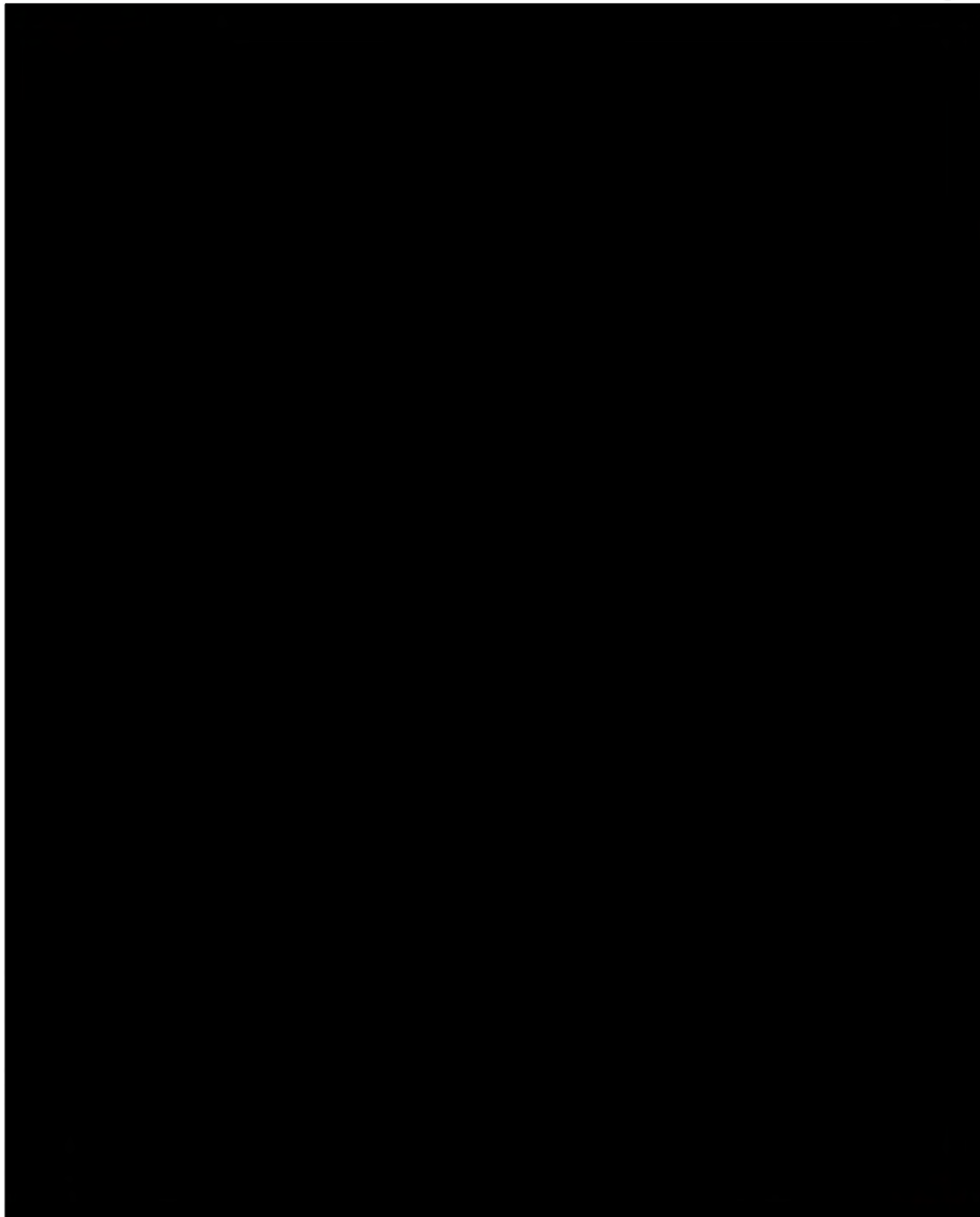


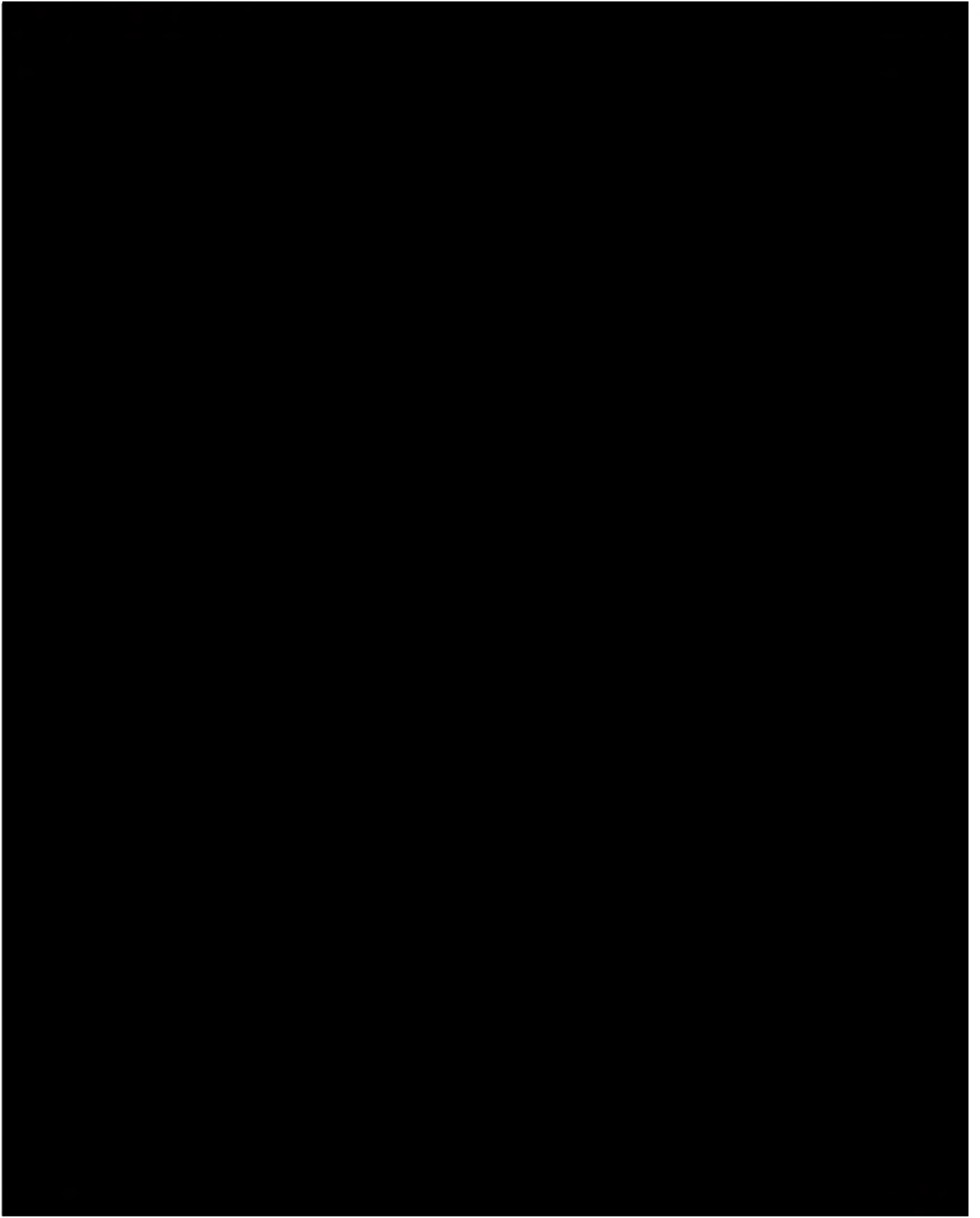
d. What are the Applicant's annual liquidity, leverage, and profitability ratios, including current ratio, debt-to equity ratio, and gross/net margin ratios?

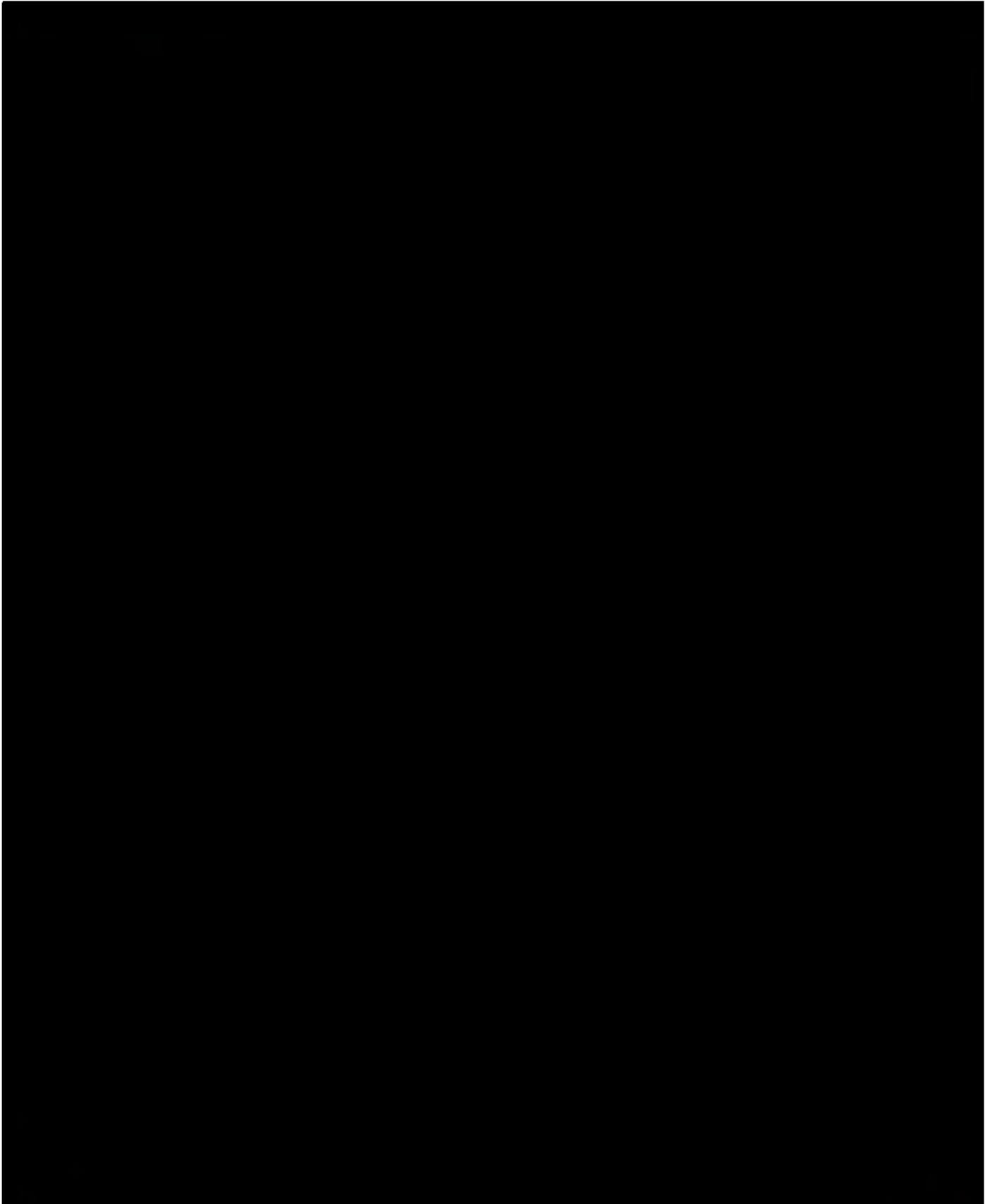


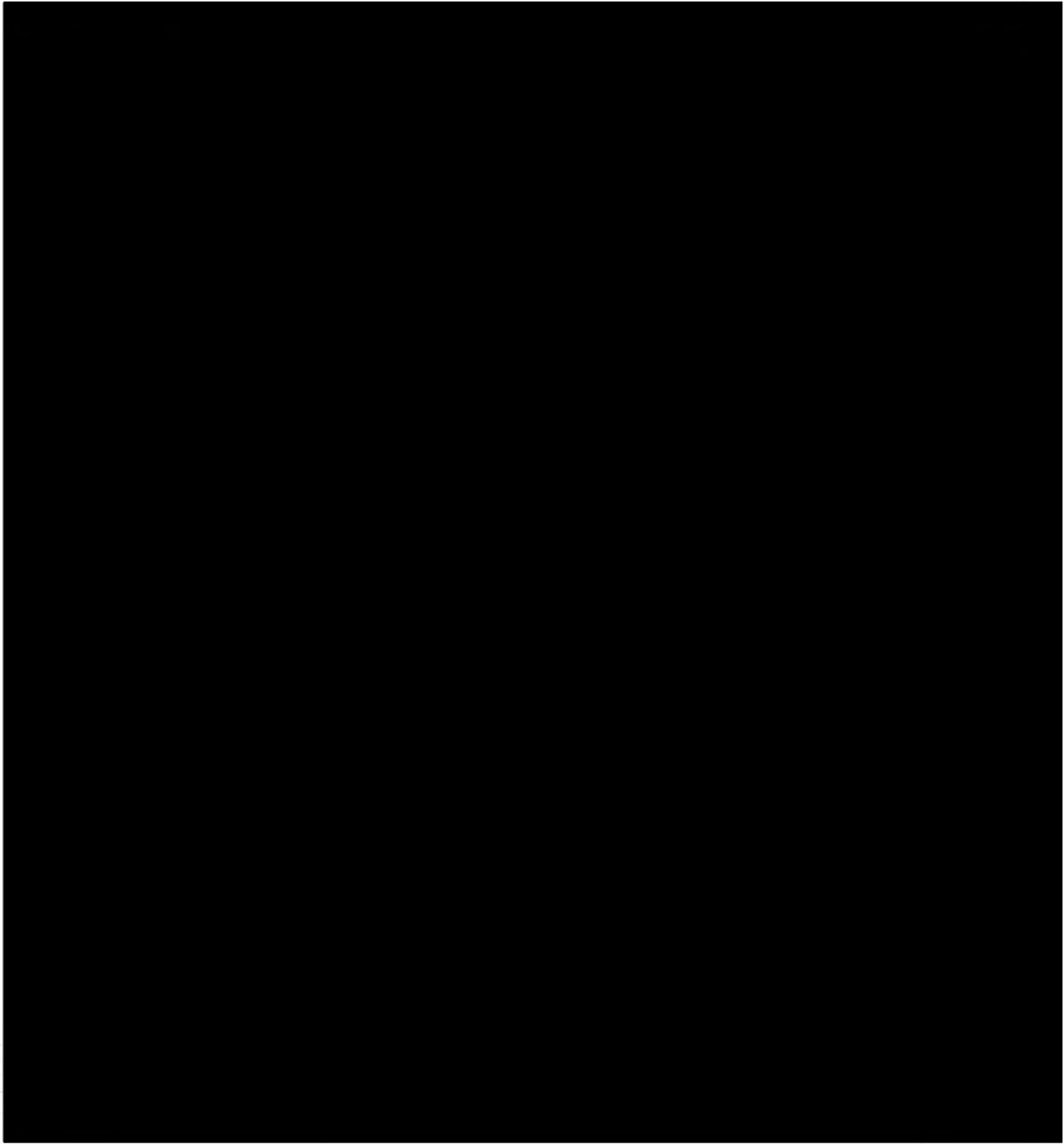
e. A description of any administrative or judicial proceeding, during the last ten years, in which the applicant or any entity that owns 5%, or greater share, was found to have violated a statute or regulation governing its operation









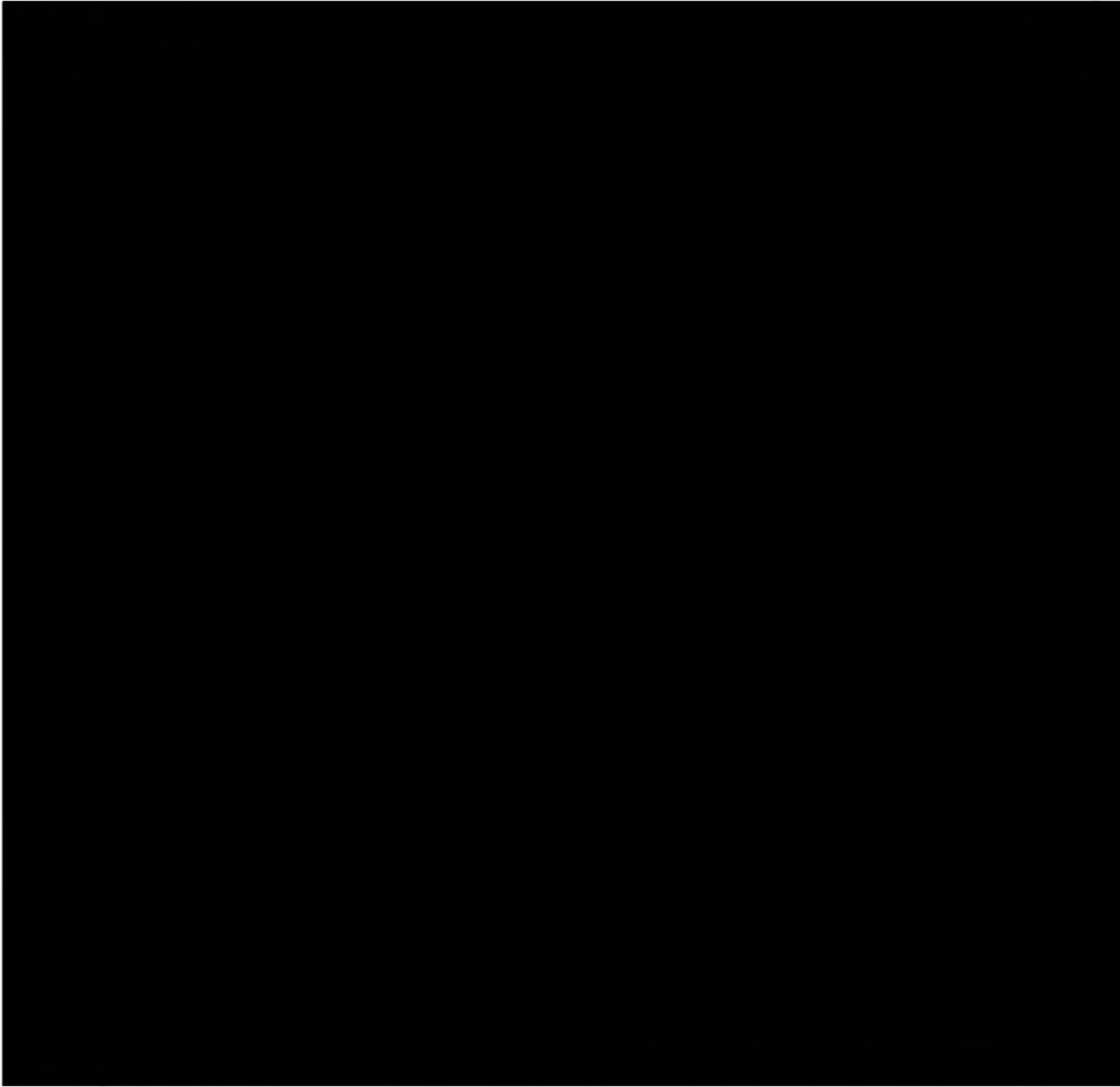


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f. Any bankruptcy filings made, or proceedings commenced, for any entities owned or controlled by the applicant and any entity owning a 5% or greater share of the applicant.

Neither PointsBet Massachusetts LLC nor any entities owned or controlled by the applicant and any entity owning 5% or greater share of PointsBet Massachusetts LLC have made any bankruptcy filings, or had proceedings commenced.

g. Any financing amounts or ownership interests that are anticipated to come from minorities, women, and/or disadvantaged businesses. If the applicant, or any portion of the applicant, is a public company, it is not necessary to list shareholders



PointsBet Massachusetts LLC's parent company, PointsBet Holding Limited is publicly traded on the Australian Securities Exchange. Due to the nature of the publicly traded company, PointsBet cannot speculate as to the portions of ownership that is anticipated from minorities, women and/or disadvantaged businesses.

h. Examples and/or narratives that substantiate the applicant's understanding of and experience with Internal Controls.

PointsBet has successfully launched in twelve U.S. jurisdictions that all have accepted and approved PointsBet's internal controls. PointsBet has not been fined or received any regulatory action regarding internal controls since 2019 in any of the ten jurisdictions launched during that time.

PointsBet continues to follow jurisdictional rules to update and notify the correct regulatory bodies of any change in policies. PointsBet has an expansive compliance team that works with regulators to continually ensure that all internal controls meet the standards of the jurisdiction. No launch has ever been delayed due to insufficient internal control standards.

G.4 COMPLIANCE Provide the following information on whether the applicant or its Key Persons has ever:

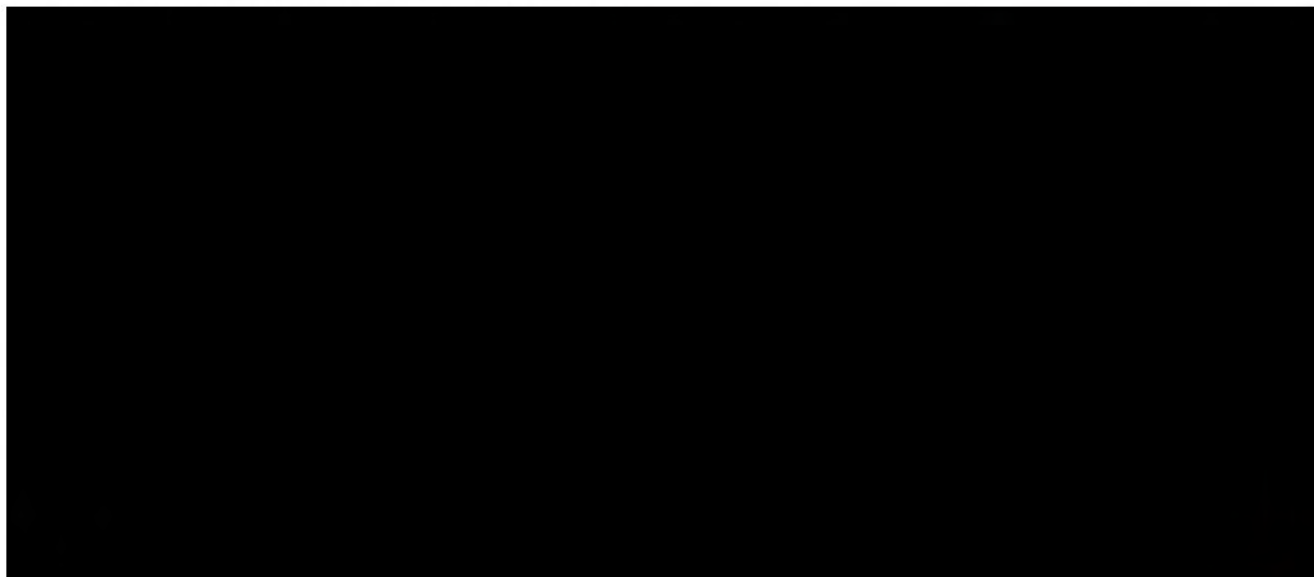
a. Been employed by the Massachusetts Gaming Commission

PointsBet Massachusetts LLC, as well as its key employees have not been employed by the Massachusetts Gaming Commission.

b. Possessed a gaming license (casino, video gaming, charitable games, lottery, pari-mutuel, sports wagering, etc.) issued by any jurisdiction – if so, please provide a copy of each license

PointsBet Massachusetts LLC is an entity formed to do business in the state of Massachusetts and has not been issued a gaming license in any other jurisdiction. PointsBet has provided as attachment, **G4-b-01 PB Licenses.pdf**, a copy of all current licenses.

PointsBet Massachusetts LLC's key persons hold the gaming licenses as listed below. PointsBet does not have copies of individual licenses, as jurisdictions do not provide e-copies. The license numbers which are available to the public to look up are provided in parentheses.



c. Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth

PointsBet Massachusetts LLC or its Key Persons have not held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth.

d. Withdrawn a gaming license application, in any jurisdiction – *if so, please submit a detailed description of each withdrawal.*

PointsBet Massachusetts LLC or its Key Persons have not withdrawn a gaming license application, in any jurisdiction. However, PointsBet Ohio LLC withdrew its application for consideration of a Management Services Provider License.

e. Been denied a gaming-related license or finding of suitability, in any jurisdiction – *if so, submit a detailed statement describing the denial and/or related findings.*

PointsBet Massachusetts LLC or its Key Persons have not been denied a gaming-related license or finding of suitability, in any jurisdiction.

f. Had a gaming license suspended, in any jurisdiction – *if so, include a detailed statement regarding each suspension*

PointsBet Massachusetts LLC, its Key Persons, and the wider PointsBet group have not had a gaming license suspended, in any jurisdiction.

g. Had a gaming license revoked, in any jurisdiction, or has had disciplinary action initiated to revoke a license – *if so, submit a detailed description of each revocation or action initiated*

PointsBet Massachusetts LLC or its Key Persons have not had a gaming license revoked, in any jurisdiction, or has had disciplinary action initiated to revoke a license.

h. Had a gaming license non-renewed or considered for non-renewal, in any jurisdiction – *if so, provide a detailed description of the circumstances*



PointsBet Massachusetts LLC, its Key Persons, and the wider PointsBet group have not had a gaming license non-renewed or considered for non-renewal, in any jurisdiction.

i. Been found unsuitable gaming license non-renewed or considered for non-renewal, in any jurisdiction – if so, provide a detailed description of the circumstances

PointsBet Massachusetts LLC, its Key Persons, and the wider PointsBet group have not been found unsuitable gaming license non-renewed or considered for non-renewal, in any jurisdiction.



Attachment - B4-f-NBC Support Letter.pdf

Confidential - Redacted

Attachment - C2-a-01 Revenue Projections CONFIDENTIAL

Confidential - Redacted

Diversity Policy

PointsBet Holdings Limited
ACN 621 179 351

Adopted by the Board on 22
2021

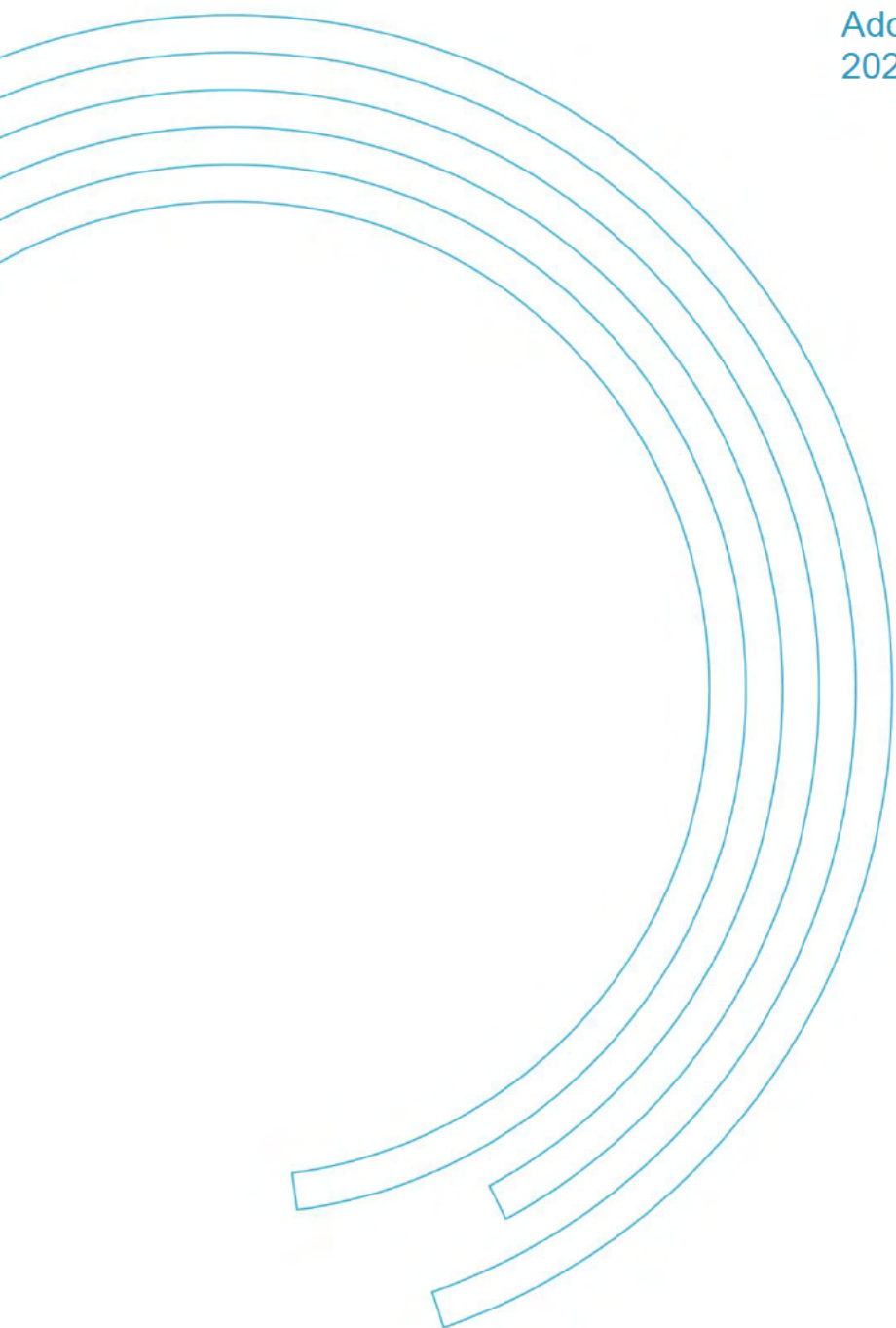


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1 Purpose

PointsBet Holdings Limited (the **Company**) recognises that people are its most important asset and is committed to achieving workplace diversity.

The purpose of this Diversity Policy (**Policy**) is to set out the Company's commitment to diversity by:

- (a) setting measurable objectives to achieve diversity;
- (b) broadening the field of potential candidates for senior management positions and appointments to the board of Directors (**Board**);
- (c) increasing the transparency of the Board appointment process; and
- (d) embedding the extent to which the Board has achieved the objective of this Policy in the evaluation criteria for the annual review of Board performance.

2 What diversity means to us

Diversity refers to characteristics that make individuals different from each other. Diversity encompasses differences in backgrounds, qualifications and experience, and also differences in approach and viewpoints. It includes factors such as gender, age, race, disability, ethnicity, marital or family status, religious or cultural background, socio-economic background, sexual orientation, gender identity, sexual preference, language and other areas of potential difference.

3 Role of the Board

It is the responsibility of the Board to foster an environment where:

- (a) individual differences are respected;
- (b) the ability to contribute and access employment opportunities is based on performance, skill and merit; and
- (c) inappropriate attitudes, behaviours and stereotypes are identified, confronted and eliminated.

4 Measurable objectives

The Company will:

- (a) establish appropriate and measurable objectives for achieving gender and other forms of diversity. Where, at the commencement of a financial year, the Company is included in the S&P / ASX 300, the Company will seek to have not less than 30% of its Directors of each gender within a period to be determined by the Board;

- (b) seek to maintain a diverse field of potential candidates for senior management and Board appointments;
- (c) set key performance indicators for senior management to measure the achievement of the objectives which have been set to achieve gender and other forms of diversity;
- (d) require senior management to report on the achievement of such objectives;
- (e) consider and, if relevant, implement policies and programs that address impediments to gender diversity in the workplace (including parental leave and flexible working arrangements that assist employees to fulfil their domestic responsibilities, and other programmes that, over time, help to prepare junior staff for senior management and Board positions), and review these policies to ensure that they are available to and utilised by both men and women at all levels; and
- (f) annually review, assess and report the Group's progress towards achieving those measurable objectives and the adequacy of the Group's programs and initiatives in that regard.

These objectives and the performance of the Company against these objectives will be reviewed annually by the Remuneration and Nomination Committee (or such other committee determined by the Board), as part of its annual review of the effectiveness of this Policy.

5 Recruitment, selection and succession planning

5.1 Succession planning

The Board, in conjunction with the Remuneration and Nomination Committee, is responsible for the development and succession planning process for the Chief Executive Officer (**CEO**) and the CEO's direct reports. In making recommendations to the Board in relation to succession planning, the Remuneration and Nomination Committee will have regard to diversity criteria.

5.2 Board appointment process

The Remuneration and Nomination Committee is responsible for reviewing and making recommendations to the Board on the criteria for nomination as a Director. In making recommendations to the Board in relation to Director nomination, the Remuneration and Nomination Committee will have regard to diversity criteria.

5.3 Recruitment generally

The Company is committed to ensuring equal employment opportunity for all of its employees and senior management, based on merit, ability, performance and potential, in a way that contributes to the achievement of its corporate objectives, including diversity.

The Board will monitor and promote the diversity of staff and the associated corporate culture, including by ensuring that recruitment and selection processes at all levels are appropriately structured so that a diverse range of candidates are considered and will seek to put in place processes to ensure that there are no biases that might discriminate against certain candidates.

6 Work environment

The Company will ensure that all officers, employees and contractors have access to a work environment that is free from harassment. The Company will not permit unwanted conduct based on an officer, employee or contractor's personal circumstances or characteristics.

The Board and senior managers of the Company will foster a work environment that is harassment free, and ensure that complaints or reports of sexual, racial or other harassment are treated seriously and confidentially by the Company.

7 Review of Policy and reporting

The Remuneration and Nomination Committee is responsible for the review and oversight of this Policy. In executing this role, the Remuneration and Nomination Committee will, with the appropriate support and input from management:

- (a) review on an annual basis:
 - (i) the effectiveness of this Policy, its objectives and the strategies outlined above which aim to achieve the objectives; and
 - (ii) the division of responsibilities and accountability for developing and implementing diversity initiatives within the Company;
- (b) review on an annual basis the diversity requirements in all jurisdictions in which the Company operates and the effectiveness of this Policy in satisfying those requirements;
- (c) report to the Board on the outcomes of its review, including any recommendations for changes to those strategies or the way in which they are implemented; and
- (d) provide information in the Company's annual report regarding:
 - (i) key features of this Policy;
 - (ii) details of the measureable objectives set under this Policy;
 - (iii) a summary of the Company's progress towards achieving those measurable objectives; and
 - (iv) either
 - (A) the proportion of women employees in the organisation, in senior executive positions and on the Board; or
 - (B) where the Company is required to comply with the *Workplace Gender Equality Act 2012* (Cth) (the **Act**), the Company's most recent "Gender Equality Indicators" as defined and published under the Act.



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SUSTAINABILITY REPORT 2022



CONTENTS

- A Message from our CEO
- FY22 Sustainability Highlights
- 1. PointsBet People
- 2. Responsibility
- 3. Community & Environment
- 4. Regulation
- 5. Corporate Governance



A MESSAGE FROM OUR CEO

I am delighted to share with you PointsBet's inaugural Environmental, Social, and Governance (ESG) Report. This report reflects the results of a comprehensive assessment undertaken during FY22 by PointsBet's newly established Sustainability Committee. The Sustainability Committee comprises staff from key functions, in key jurisdictions within which PointsBet operates to ensure the Group's global ESG efforts are captured.

STRATEGIC PILLARS

PointsBet's approach to ESG is based on five fundamental strategic pillars according to which this ESG Report is structured, being:

- PointsBet People
- Responsibility
- Community and Environment
- Regulation
- Corporate Governance

These pillars guide PointsBet's ESG commitments, programs and objectives, and manifest in actions and initiatives that touch upon all of the Group's various operating sectors.

The ESG disclosures contained in this report are also an important opportunity for PointsBet to provide information about its business beyond the usual financials and offer insight into how the Group strives to create long-term value for all its stakeholders.

This is PointsBet's first ESG Report as a listed company and provides the baseline for the Group's ESG journey. PointsBet is committed to ongoing assessment, monitoring and future reporting in a more fulsome manner on the most material ESG topics impacting PointsBet and the online gambling industry.

COVID-19

FY22 has been another challenging year of the COVID-19 pandemic (the **Pandemic**) in all jurisdictions within which PointsBet operates. The Group's focus was foremost on the health, wellness and resilience of its people. As a result, a key area of the Board's governance during the year was dedicated to the Group's response to the Pandemic, including overseeing the continued transition of the global workforce to a hybrid working environment, continued refinement of business continuity and crisis management planning including input from global and regional crisis management teams mobilised to coordinate and oversee the Group's ongoing response both proactively and reactively.

RESPONSIBLE GAMBLING

As a Group, PointsBet embraces its role in promoting a legal and responsible wagering model that respects the consumer's right to free choice but acknowledges the consumer as a subject to be protected. This is why the Group strives to offer safe, high-quality, innovative, and engaging wagering experiences for all its consumers. PointsBet's commitment to all of its stakeholders (employees, customers, suppliers, investors and communities) is that it will take all the necessary measures to ensure that attention to responsible gambling remains a central component of its ESG business strategy, and an integral part of daily operations.

To this end, the Group works every day with honesty and professionalism to promote a responsible and conscientious approach to gambling and is focused on helping our customers approach gambling activities in a manner that is healthy and respectful of their limits.

On behalf of the Board, I want to thank the many people across the Group's diverse global team who contributed to the preparation of our FY22 ESG Report, and to the many more whose passion and initiative drove the encouraging progress that I am proud to share with you here.

If you have any questions or feedback about the disclosures contained in this ESG Report, PointsBet would love to hear from you. Either reach out to your PointsBet contact or get in touch via our Investor Relations team: investors@pointsbet.com.

Sam Swanell
Managing Director
and Group CEO



FY22 SUSTAINABILITY HIGHLIGHTS

RESPONSIBLE GAMBLING



In Australia:

- Joined Responsible Wagering Australia (**RWA**)

In North America:

- Contributed to joint responsible gambling research initiative with National Council on Problem Gambling (**NCPG**)

Global Initiatives:

- Over 500 hours of responsible gambling training completed globally

GOVERNANCE



- Reported on Modern Slavery risks for the first time
- Achieved 33% female Non-Executive Directors on the Board
- Review of key Governance Policies
- Independent Review of AML/CTF policy and operations

OUR PEOPLE



- 627 global full time equivalent employees
- 218 Australia
- 349 North America
- 59 Other
- Launched the PointsBet Flex Program
- Launched a Global Leadership Program
- Increased focus on DEI initiatives both globally and at a jurisdictional level

COMMUNITY & ENVIRONMENT



- Supported efforts to increase blood donations in Australia and North America
- Made significant financial contributions to the communities in which we operate through taxes and other fees
- Supported the efforts of Sydney FC to get more people living with disabilities in sport by sponsoring the Sydney FC Charitable Foundation and its power chair football (soccer) initiative

Support for Women:

- Women in Sports Tech (WiST)
- College scholarships for women in Tech

REGULATION



- Continued commitment to only operating in Regulated markets
- Contributed to regulatory discourse in the jurisdictions within which the Group operates
- Provided dedicated training to PointsBet people focused on regulatory compliance and similar matters

1. POINTSBET PEOPLE

LEADERSHIP

Throughout FY22 PointsBet invested in strengthening its global leadership capability including through the establishment of key new roles such as:

- Group Chief People Officer;
- CEO – Australia;
- Group Chief Technology Officer; and
- VP of DEI (Diversity, Equity and Inclusion).

In addition to the appointment of a new Group Chief Technology Officer, the former President of Global Products and Technology transitioned to a Non-Executive Board position, ensuring continuity of thought leadership.

The Group's commitment to developing leadership talent internally saw the launch of a new global PointsBet Leadership Program, which has thus far been opened up to more than 100 frontline and middle management leaders across all of PointsBet's global operations. In partnering with DDI, a world leader in leadership development, PointsBet is delivering a consistent blended learning program, offering the best of online and classroom learning, and covering topics such as 'Leading Virtually', 'Engaging Talent', and 'Executing Strategy'. As a recent technology success story, PointsBet knows that strong and empowered leaders at all management levels will be critical to the Group's success. Through the PointsBet Leadership Program, the goal is to provide both current leaders and emerging leaders the tools to build a culture of inclusiveness, motivation, and support.

Looking ahead, ensuring that women within PointsBet's workforce have equal opportunity to pursue leadership roles is a key goal for the Group. PointsBet has made a good start, with 33% of NEDs on the Board and 18% of leadership positions within the Group currently being occupied by women.

WORKFORCE

Throughout FY22, increased operational requirements led to expansion of PointsBet's global employee headcount to 627. In addition PointsBet has support staff who are engaged by third party service companies in both Noida, India and Manila, Philippines. Underscoring the technology success story that is PointsBet, one third of global employees are now employed in roles within the Technology function.

Reinforcing the Group's commitment to growth, PointsBet opened the following new offices in FY22:

- European Headquarters in Dublin, Ireland;
- Sydney, Australia; and
- Noida, India.

With the easing of lockdowns, PointsBet was again able to offer relocation opportunities for employees between countries, enabling the Group to utilise its best talent where needed, and providing an ongoing pipeline for internal development. During FY22, the Group expanded its global mobility services offering for employees to include tax consultation and advice provided by a third-party vendor to support relocating employees.

THROUGHOUT
FY22, INCREASED
OPERATIONAL
REQUIREMENTS
LED TO EXPANSION
OF POINTSBET'S
**GLOBAL
EMPLOYEE**
HEADCOUNT
TO **627**

Challenges associated with the Pandemic continued to evolve, with lockdowns and work from home orders affecting PointsBet people globally. Pleasingly, as at the time of making this ESG Report, all PointsBet offices are open and operating with a Hybrid working model. Hybrid working adds yet another dimension of flexibility for the majority of PointsBet's workforce, aiming to strike the right balance between roles which are fully remote, those which offer a mixture of at home and in office working, and those which by their nature require working fulltime at one of the many PointsBet offices throughout the world. As the impacts of the Pandemic continue to evolve, PointsBet strives to provide employees with flexibility and support, as the Group and its staff continue to learn and adapt to the evolving conditions.

WELLNESS

FLEXIBILITY

In response to employee feedback, the Group launched *PointsBet Flex*, a flexibility program designed to support PointsBet people and the way they choose to work with increased flexibility of work location, and autonomy to choose how to work in ways that best fit different roles and teams. Globally, PointsBet now operates a Hybrid model of work combining a balance of work from home, remote, and in office time. PointsBet knows that collaboration is vital, so PointsBet teams come together regularly in person to strategise, problem solve, collaborate and importantly, celebrate!



POINTS BET FLEX OFFERS:

- **Flexible Work Arrangements**
- **PointsBet Day:** a day off to recognise and celebrate your work anniversary each year
- **Work from Anywhere Time:** 4 weeks to provide employees with the flexibility to choose where to work, and how best to manage family and lifestyle commitments
- **Floating Cultural Holidays:** allows employees to choose which Public Holidays to recognise enabling celebration of important cultural events for employees of all backgrounds
- **242 Leave:** allows employees to take up to 2 months of unpaid leave as a 'sabbatical' for every 2 years of employment

In addition to these key global initiatives, PointsBet Flex also includes various local initiatives at a jurisdictional level to provide additional support and flexibility in each jurisdiction within which PointsBet operates. Examples of such initiatives include:

- 'No Meeting Fridays';
- flexible work hours within identified core business hours; and
- social committees focused on employee flexibility and wellness.

With PointsBet Flex, the Group recognises that the wellbeing of employees is of paramount concern, and PointsBet will continue to evolve the program as is necessary to continue supporting its people.

MENTAL HEALTH

With an end to the Pandemic still not in sight, supporting the mental health of PointsBet people is more important than ever.

The Group offers Employee Assistance Programs (**EAP**) in all jurisdictions within which it operates, and these EAPs offer a range of services including counselling and whistleblowing services. PointsBet's goal is to ensure the mental wellbeing of its employees is at the forefront of everything the Group does. Access to safe and effective mental health services is vital, so in addition to providing EAP, PointsBet aims to identify, educate, and remove the stigma that can attach to mental health issues in the workplace. PointsBet does this by testing and implementing new mental health initiatives, such as:

- Activities focused on mental fitness and mindfulness;
- Wellness related activities and events;
- Mental Health days;
- In chair massages to relieve stress; and
- Mental health awareness education aimed at spreading awareness and reducing stigma.

1. POINTSBET PEOPLE continued

PHYSICAL HEALTH

The physical health and safety of PointsBet people is a continued focus. To combat return to office work challenges associated with the Pandemic, the Group provided safety equipment and other resources including temperature scanners, hand sanitiser dispensers, masks, rapid antigen tests and annual flu vaccinations. In addition, refresher training was held for first aid officers and fire wardens. With teams back in the office, there has been a renewed focus on physical health with gym classes and sports activities available.

CULTURE AND ENGAGEMENT

PointsBet continued its *Listening Strategy* during FY22 by conducting regular surveys and pulse check ins with employees on various topics.

A key focus was benchmarking and improving PointsBet's Employee Value Proposition (EVP).

Work continued on strengthening company culture including the development of PointsBet's Values and Behaviours, workshopped, and designed in collaboration with all team members.

Celebration of milestones and achievements remains a key culture driver, with the Group celebrating critical wins during FY22, including State by State roll outs across the US and the opening of its sportsbook in Ontario, Canada.

To build on its existing strategy, PointsBet kickstarted a revamp of its cultural Values and Behaviors in FY22, which the Group sees as critical to future performance as an employer of choice. PointsBet expects to roll out the revamped Values and Behaviors during the first half of FY23.



OBJECTIVE AND KEY RESULTS



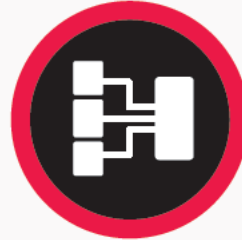
WORKFORCE

Build high performance team that is reflective of the key characteristics of a diverse company.



WORKPLACE

Create workplace that is diverse, inclusive, equitable and ensures our ability to provide each employee with the professional opportunities and personal support they desire.



SUPPLIER DIVERSITY

Promote the growth of the communities we work and serve through intentional partnership with MBE, WBE, VET and DBE companies and service providers.



MARKETPLACE

Connect to customers and business partners through our diversity and inclusion.

DIVERSITY, EQUITY & INCLUSION

With operations in Europe, North America, Asia and Australia, PointsBet employs a diverse workforce.

In FY22 the Group made a sizeable investment in DEI a cornerstone of which was the hiring of a dedicated Vice President of DEI, establishment of the new DEI Board and an Internal Culture & Communications Committee.

The DEI Board consists of PointsBet executives supported by several prominent external members with expertise in diversity and professional. The Internal Culture & Communications Committee is comprised of 10 PointsBet employees charged with serving as an internal planning team and as ambassadors for the Group's efforts related to DEI.

Initiatives championed during FY22 included:

- Cultural Day celebrations;
- Implementation of a DEI focused education series;
- Establishment community partnerships with women-in-tech organisations;
- International Women's Day celebration in all offices;
- Domestic & Family Violence policies reviewed and updated including by introducing new paid leave support;
- Increased parental leave entitlements; and
- The introduction of forums for women including a Women-at-PointsBet group.

FY23 GOALS

PointsBet will continue its commitment to people in FY23 with continued talent mapping and succession planning.

Among other initiatives, PointsBet plans to continue the evolution of its DEI program and explore new ways for building employee resilience.

2. RESPONSIBILITY

OVERVIEW

PointsBet is committed to delivering a premium experience for its customers by offering products which are fun and meant to be enjoyed as a form of entertainment. Central to this commitment is a respect which the Group holds for its customers not only as revenue generators but also as individuals whose lives should not be negatively impacted by engagement with PointsBet products. PointsBet, like all operators, is in a unique position to promote responsible gambling and the associated tools available to PointsBet clients. Not only does this emphasis on responsible gambling help protect customers, but it also helps create long-term relationships with healthy players and is hence viewed as a critical component of business sustainability for PointsBet. To that end, PointsBet employees are trained to be aware of problem gambling concerns, and to help customers seeking assistance in relation to their gambling habits.

For the vast majority of customers, gambling represents an occasional, well-controlled and entirely healthy leisure activity. However, PointsBet acknowledges and is fully aware that a small percentage of customers are susceptible to developing problematic behaviours associated with gambling, especially when a combination of other risk factors is present. In some cases, these behaviours can have severe negative consequences on customer's personal, relational, working and economic spheres.

PointsBet operates with a full awareness of its role in promoting a legal and responsible gambling model, respecting the customer as a subject to be protected, and to whom PointsBet must strive to offer safe, high-quality, innovative, and engaging gambling experience.

The Group's approach to responsible gambling comprises four strategic pillars, which together aim to minimise gambling related harms:

- Communication;
- Product;
- Responsible Business Conduct; and
- Community.

These pillars are continually evaluated by PointsBet's dedicated responsible gambling teams in each jurisdiction within which it operates to ensure that data-informed best practices are being offered at all times.

COMMUNICATION

Thoughtful communication of the importance of responsible gambling and associated tools is integrated throughout the PointsBet customer journey, with the aim being to encourage a healthy entertainment experience at all stages of the customer lifecycle.

Additional communication strategies are in place for unique customer journeys such as significant sporting events [AUS] or retail environments [US].

INFORMATIVE T&CS

PointsBet's Terms and Conditions include detailed information about the Group's commitment to Responsible Gambling. These terms and conditions are available to any person, including individuals who are not customers at all times on the various websites, mobile websites and apps operated by the Group. Included in PointsBet's Terms and Conditions is a clear and concise Responsible Gambling Policy and information about PointsBet's responsible gambling tools. PointsBet has made a concerted effort to ensure that responsible gambling information is easily available for any individual seeking assistance and is committed to ongoing improvement in this area.

OUTBOUND CAMPAIGNS

PointsBet believes that responsible gambling should be a normal part of a healthy gambling experience and therefore is careful to integrate associated messaging throughout the various stages of the customer lifecycle. This begins shortly after new account creation with new customers receiving a dedicated responsible gambling email detailing the tools available to them at any time.

To ensure that Responsible Gambling communications are distributed to customers at appropriate intervals, PointsBet maintains a responsible gambling monitoring program that, among other things, will automatically trigger the sending of responsible gambling communications in the form of emails and in-app messages at pre-defined trigger points. These communications aim to increase awareness of the importance of responsible gamblers amongst potentially at-risk customers and to drive recipients to the applicable PointsBet responsible gambling page. These communications serve as reminders that there are tools available to ensure customers are in control of their gambling.

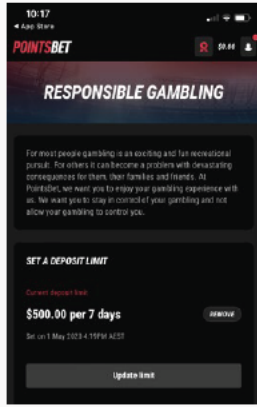
PointsBet also takes advantage of increased customer activity leading up to large-scale sporting events by sending out text messages to remind customers to gamble responsibly.

SOCIAL MEDIA MARKETING

PointsBet utilises social media to promote responsible gambling and further engage customers. These campaigns include information about limit setting tools as well as healthy gambling tips such as taking a break. Social media provides an opportunity to engage with users within this important space.

BEHAVIOURAL TARGETED MESSAGING

In addition to emails and in-app messages, dedicated Responsible Gambling team members assist customers when potentially problematic gambling behaviour is identified. PointsBet's dedicated Responsible Gambling teams monitor and review exception reports to identify evolving customer behaviour and where red flags are identified, contact the customer to educate them on responsible gambling tools and/or provide support resources. Customer service team members are also trained to identify statements made via email or chat which indicate that the customer may be struggling to control their gambling and if identified, to escalate to the Responsible Gambling teams.



ACQUISITION

Support messaging is incorporated within all physical and digital advertising in accordance with regulation.



ACCOUNT CREATION

Within one hour of account creation, all customers receive a responsible gambling email which highlights limit setting tools and support resources.



CONTINUED SUPPORT

Customers receive a monthly responsible gambling email and may view a responsible gambling message posted daily on social media.



BEHAVIOURAL MESSAGING

Customers who reach certain activity levels or who exhibit potentially problematic behaviour at any time within the customer journey receive personalised communication around responsible gambling.

LIMIT PROMPTS

PointsBet complies with all local laws and regulations related to responsible gambling in the jurisdictions within which it operates. Among other requirements, this means ensuring that new customers are prompted about limit setting during account creation process. Account creation which incorporates this feature prompts users to set a limit before they begin gambling.

PRODUCT

In accordance with good UX principles, PointsBet is continually exploring new product features to build on the existing suite of responsible gambling tools, and which are designed to support the health and security of our customers.

Touchpoints are incorporated throughout the PointsBet customer lifecycle to ensure easy access to information about responsible gambling, much of which is accessible through dedicated on website or in app Responsible Gambling pages. Combined, PointsBet's Responsible Gambling pages received approximately a combined 125,000+ global page views during FY22.

POINTS BET
BELIEVES THAT
**RESPONSIBLE
GAMBLING**
SHOULD BE A
NORMAL PART
OF A **HEALTHY
GAMBLING
EXPERIENCE**

2. RESPONSIBILITY continued



LIMIT SETTING AND FEEDBACK TOOLS

The various responsible gambling tools that PointsBet makes available to its clients globally includes:

- **"i" Icon:** Understand rules and odds before placing a sport or casino bet;
- **Deposit Limit:** Manage deposit amounts every day, week, or month;
- **Spend Limit:** Control total spend on a daily, weekly, or monthly basis;
- **Stop Loss Adjuster:** Control potential max wins and losses before placing a points bet;
- **Cool Off:** Take a break from PointsBet for 3, 7 or 30 days;
- **Self-Exclusion:** Take a longer-term break either via PointsBet or state regulator exclusion programs;
- **Activity Statement:** Review lifetime history of deposits, withdrawals and bet placement; and
- **Front-end Controls:** Limit duplicates or customers who may be taking a break.

Additional responsible gambling tools available in the United States include:

- **Time/Wager Limit:** Receive pop up notifications for session length and wager amount in 15, 30 or 60 minute increments;
- **Time Limit:** Control the amount of time spent on PointsBet; and
- **Wager Limit:** Control the maximum amount per wager.

Additional responsible gambling tools available in Canada include:

- **Loss Limit:** Control the maximum amount which can be lost within a pre-determined time period.

RESPONSIBLE BUSINESS CONDUCT

PointsBet believes that the effective promotion of responsible gambling begins with a genuine commitment across all of its departments. To that end, the Group aims to empower employees by delivering training which is customised to their unique roles and by making responsible gambling resources fully accessible to all employees.

PointsBet conducts routine surveillance of its various customer databases for indicators of gambling harm through ongoing reporting and monitoring measures.

PointsBet delivers training which is tailored to the unique functions of each department with actionable insights on vulnerability, identification or potentially problematic gambling behaviour and effective communication strategies.

POINTS BET
BELIEVES THAT
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COMMUNITY

PointsBet proudly engages key stakeholders in an ongoing effort to ensure it meets best practices in responsible gambling. Global partnerships with organisations specialising in problem and responsible gambling include the National Council on Problem Gambling [US] EPIC Risk Management [US, AUS] Gamblers Anonymous [AUS] Responsible Gambling Council [US, CAN] and local problem gambling councils.



PointsBet only operates within regulated markets which ensures that regulated standards of consumer protection are met, and positive impacts of legalised gambling are felt within the communities that PointsBet operates.

In addition, in the United States, in collaboration with the National Council on Problem Gambling, during FY23 PointsBet will administer a responsible gambling survey during their annual conference to spark dialogue amongst key stakeholders.

3. COMMUNITY & ENVIRONMENT



Over A\$150,000 was raised for charity during the Shaquille O'Neal celebrity 3-point shootout

COMMUNITY GROUPS

Throughout its global operations, PointsBet is an active contributor in community groups.

A particular focus for the Group during FY22 has been supporting different groups in sports, with plans to continue expanding this support across a range of sporting endeavors.

Current initiatives include:

- Sponsorship of Sydney FC Charitable Foundation power chair football (soccer) program; and
- Partnering with Women in Sports Tech (WiST) to increase career opportunities for women www.womeninsportstech.org.

In addition, PointsBet is associated with The Women's Chamber of Commerce, and The Denver Chamber of Commerce.

CHARITABLE DONATIONS AND SCHOLARSHIPS

During FY22, PointsBet made donations totaling US\$500,000, to Hampton and Norfolk Universities in Virginia, which are HBCU colleges (Historically black colleges and universities) to support scholarships for women in technology.

As part of the market access deal with Texas, PointsBet contributed US \$100,000 to the Austin Football Club, with a further US \$75,000 donated to The University of Colorado. US \$10,000 was donated to the Nota Begay Foundation supporting Native American community health, and US \$50,000 was donated to Women in Sports Technology 'WiST', established to drive growth opportunities for women, at the intersection of sports, technology and innovation.

THE ENVIRONMENT

PointsBet supports environmental sustainability through multiple activities, such as:

- The smart use of office resources;
- Purchase of recycled paper and supplies;
- Recycling of batteries, electronics, and IT equipment;
- Internal recycling of office waste, and paper through recycling bins;
- Smart use of power through sensor lighting, and heating/cooling during non-peak periods;
- Provision of re-usable 'KEEP' cups to all new employees; and
- Use of crockery and silverware instead of paper or plastic.

PointsBet is committed to continuous improvement in this important area and will seek to expand its environmental sustainability programs globally throughout FY23. It is intended that the Group will focus its efforts on areas including the use of biodegradable, fairtrade and recycled products. PointsBet will aim to continue reduction in the overall amount of paper and paper products used, with a preference for crockery and other non-paper products.

During FY22 PointsBet's relocated its European operations to a new office in Dublin also contributed to environmental sustainability of the Group. This building, named 'The Eight Building', is purpose built by its constructors, with a focus on sustainability. The Eight Building has achieved a BER (Building Efficiency Rating) of BER A3, which is in the top category for energy efficiency, and LEED Gold Building Certification. The Eight Building also incorporates multiple leading sustainability practices such as:

- Hot water generation via Mitsubishi heat pump technology for energy efficiency;
- Energy efficient LED lighting is throughout;
- PV panels on roof allowing an element of carbon neutral offset energy;

As PointsBet's global requirements continue to evolve, environmental sustainability will become an increased focus in the Group's decision making. In to the future, the preference will be to engage (where possible) with partners and suppliers who are sustainable and have sustainable practices.

TAXES

PointsBet is a meaningful and significant economic contributor to the various communities within which it does business. Among other ways, this contribution is made through the payment of various gambling specific taxes and other fees (e.g., point of consumption tax) which are paid by PointsBet in addition to the various ordinary taxes, levies and duties that all companies are expected to pay.

For the 12 months to 30 June 2022, the PointsBet Group paid A\$142.2 million in wagering specific taxes, including through the payment of GST, State Point of Consumption Tax and sport and racing products fees in Australia and state wagering taxes and licence fees in North America.

GIVING

Throughout its global operations, PointsBet organised various giving activities for employee participation. Such activities included regular blood donation drive days during which employees were encouraged to donate blood and given paid time off to do so.

Other activities included sponsoring local charities with a local connection for PointsBet employees and organising giving events such as canned food donations and toy drives.

THE GROUP
WILL FOCUS ITS
EFFORTS ON
AREAS INCLUDING
THE USE OF
**BIODEGRADABLE,
FAIRTRADE
AND RECYCLED
PRODUCTS**

4. REGULATION

PointsBet aspires to be a best-in-class gambling operator and a responsible corporate citizen. A key part of this is being an active contributor to the regulatory process within the markets in which the Group operates. During FY22, PointsBet only operated in jurisdictions with a regulated wagering and/or gaming market, meaning that 100% of Group revenue for the period was derived from licensed activities in markets committed to responsible service of gambling.

OPERATING IN REGULATED MARKETS IMPORTANT

PointsBet believes that a thriving gambling sector is only sustainable within a framework that encourages competitive play and minimises the risk of harmful consequences for customers. A fully regulated market is the only way to effectively achieve this delicate balance, and so PointsBet is committed to continuing to only operate within such regulatory frameworks. Where PointsBet considers entering a newly regulated or regulating market, the Group will engage regulators and other stakeholders to, where possible, share the benefits of our experience in other markets.

At present, PointsBet operates in Australia, USA (New York, New Jersey, Illinois, Michigan, Indiana, Kansas, Colorado, Pennsylvania, Iowa, West Virginia, Maryland and Virginia) and Canada (Ontario).

COMPLIANCE AND ENGAGEMENT

Operating in regulated markets provides PointsBet with market stability and will ultimately contribute to better growth and quality earnings for the Group. To maintain this advantage, PointsBet recognises the need to actively comply with regulatory obligations and maintain open dialogue with regulators. Active compliance means taking a responsible approach to protecting PointsBet's customers and ensuring that their experience with the Group remains fun and safe, while developing cutting edge products and services to keep the sector relevant. Open dialogue with regulators is important to ensure that the Group is a prominent contributor to future reform in the jurisdictions within which it operates and to help PointsBet comply with its licensing and other obligations including those related to responsible gambling, taxation, anti-money laundering and other financial crimes, and privacy and data security.

PointsBet assesses each jurisdiction it considers operating in and engages with regulators in the most appropriate manner for each. This may include communication directly, through industry bodies (or through other third parties) with wagering and gaming regulators, financial crime and other regulators, ministers, governments and other key stakeholders. PointsBet strives to maintain external relationships at all appropriate levels of its business with these stakeholders and to contribute to meaningful requests for submission or consultation on key sector issues or reform.

LOOKING AHEAD

Compliance and regulatory engagement will continue to be a strategic pillar for PointsBet into the future. The Board and functional teams at a jurisdictional level have been built out to include staff with dedicated responsibilities for these matters. By taking a responsible approach to compliance and by proactively engaging with regulators PointsBet will be well placed to continue its growth in mature markets and take advantage of those new and emerging while maintaining a strong focus on a best in class, responsibly provided product and service offering to our customers.

5. CORPORATE GOVERNANCE

The Board is committed to maintaining high standards of effective corporate governance arrangements to help create, protect and enhance shareholder value and ensure the future sustainability of the Group.

PointsBet's governance framework provides a solid structure for effective and responsible decision making and setting a culture of integrity, transparency and accountability that flows throughout the Group.

The FY22 Corporate Governance Statement sets out key features of our governance framework. PointsBet confirms it has followed the majority of the ASX Corporate Governance Council Principles and Recommendations 4th Edition (**ASX Principles**) during FY22. The areas of compliance and non-compliance (and the reasons for such non-compliance) with the ASX Principles are set out in the FY22 Corporate Governance Statement.

AREAS OF GOVERNANCE FOCUS

During the year, the Board provided strategic guidance and effective oversight of management in its implementation of PointsBet's objectives and instilling its values and desired culture.

SUSTAINABILITY

- Continued risk-based identification of ESG priorities, including governance, responsible gambling, data security and privacy, culture and community.
- Oversight of sustainability initiatives to ensure they are adequate to deliver progress against the Group's priorities, with Board participation where appropriate.
- Recognising that the Board, together with management, has a critical role in supporting responsible gambling at PointsBet, ongoing Board education in this area is provided as part of the Board's education and professional development calendar.

CULTURE

- Ongoing oversight of PointsBet's desired culture by leveraging data and analytics provided through a range of resources including our employee culture and engagement surveys and insights platform.

RISK MANAGEMENT

- Ongoing review and enhancement of risk management frameworks and governance to support achievement of the Group's business objectives.
- Continued focus on the health, safety and environment (**HSE**) risk management framework with global and regional business resilience teams coordinating and overseeing the Group's ongoing response to the Pandemic.

The Pandemic also prompted the Board to revisit its meeting cadence and structures, including meeting on a more frequent basis (and via virtual technology) in order to oversee and monitor the Group's Pandemic response plans.

POINTS BET GOVERNANCE POLICIES

Details of the Company's Governance Policies are summarised in the FY22 Corporate Governance Statement.

These Policies are available in the Governance section of the Company's website: <https://investors.pointsbet.com.au/>.

***POINTS*BET**

Attachment - G4-b-01 PB Licenses

Confidential - Redacted