

November 21, 2022

Massachusetts Gaming Commission
Division of Licensing
101 Federal Street, 12th Floor
Boston, Massachusetts 02110

Re: Sports Wagering License Application
Hillside (Massachusetts) LLC dba bet365

Dear Division of Licensing:

Along with this letter, please find Hillside (Massachusetts) LLC's application for a tethered Category 3 license in the Commonwealth of Massachusetts.

Last week we mailed the fingerprint cards for our individual qualifiers to your office with today as the expected delivery date. Additionally, we wired the \$200,000 application fee to your account on Friday, November 18, 2022.

In our initial scoping survey, we indicated that Hillside (Shared Services US) LLC ("Shared Services") would be applying for this sports wagering license. We ultimately decided to create a new entity, Hillside (Massachusetts) LLC, to be the applicant (the "Applicant"). Accordingly, as you can see in the attachment list above, we have included a Business Entity Disclosure Form and certification pages for the Applicant instead of Shared Services. We believe this is appropriate because Shared Services and the Applicant are identical with respect to ownership, directors and officers, and their positions within the overall bet365 group structure. However, please let me know if you have any questions.

Lastly, pursuant to the guidance announced at the Massachusetts Gaming Commission meeting on Tuesday, November 15, 2022, we will be submitting a redacted version of our application and its attachments by Monday, November 28, 2022, one week from today's application deadline. In the meantime, we have indicated generally at the top of each page that the contents of these documents contain confidential information.

Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

Robert A Moncrief Jr

Robert Moncrief
Legal and Regulatory Counsel
(917) 776-6871

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



APPLICANT NAME: Hillside (Massachusetts) LLC

Applicant: Hillside (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.

Applicant: Hillside (Massachusetts) LLC

General Information

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

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

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

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

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

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

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

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

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

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

Applicant: Hillside (Massachusetts) LLC

Non-Refundable Processing Fee

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

Completing the Application

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

Submission of Materials

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

How to Submit an MGC Sports Wagering Operator License Application

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

Electronic Application Format

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

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

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

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

C2-a-01 Revenue Projections CONFIDENTIAL.pdf

C2-b-01 Revenue Projections CONFIDENTIAL.xls

Application.pdf

Signed Application.pdf

Applicant: Hillside (Massachusetts) LLC

Public Records

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

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

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

Applicant: Hillside (Massachusetts) LLC

Checklist

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

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

Applicant: Hillside (Massachusetts) LLC

SECTION A: GENERAL INFORMATION

A.1 APPLICANT NAME

Hillside (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):
Massasoit Greyhound Association, Inc (Raynham Park)

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

9000 Lincoln Drive East

Number and Street Address

Marlton, NJ 08053

City, State, & Zip Code

(856) 655-6111

Phone Number

supportusa-eng@customerservices365.com

Email Address

www.bet365.com

Website

A.7 APPLICANT PRINCIPAL PLACE OF BUSINESS INFORMATION

9000 Lincoln Dr. East

Number and Street Address

Marlton, NJ 08053

City, State, & Zip Code

supportusa-cng@customerservices365.com

Email Address

Applicant: Hillside (Massachusetts) LLC

(856) 655-6111

Phone Number

A.7 PRIMARY CONTACT FOR THIS APPLICATION

Robert Moncrief Jr.

Name

[REDACTED]

Email Address

Legal and Regulatory Counsel - US

Title

[REDACTED]

Phone Number

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

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

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

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

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

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

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

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

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

SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

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

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

C.2 PROJECTED REVENUE

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

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

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

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

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

Applicant: Hillside (Massachusetts) LLC

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

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

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

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

Capital Investment

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

Please provide a thorough description, including the following:

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

C.5 COMMUNITY ENGAGEMENT

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

Applicant: Hillside (Massachusetts) LLC

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

SECTION D: DIVERSITY, EQUITY, & INCLUSION

D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

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

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

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

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

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

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

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

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

SECTION E: RESPONSIBLE GAMING

E.1 RESPONSIBLE GAMING POLICIES

Referencing the following documents:

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

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

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

E.2 ADVERTISING & PROMOTIONAL PLANS

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

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

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

SECTION F: TECHNOLOGY

F.1 GEOFENCING

Applicant: Hillside (Massachusetts) LLC

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

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

F.2 KNOW YOUR CUSTOMER

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

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

F.3 TECHNOLOGICAL EXPERTISE AND RELIABILITY

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

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

SECTION G: SUITABILITY

G.1 SUITABILITY – CORPORATE INTEGRITY

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

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

G.2 SUITABILITY - INDIVIDUAL QUALIFIER INTEGRITY

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

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

Applicant: Hillside (Massachusetts) LLC

- [Massachusetts Gaming Commission Supplemental Form](#)

G.3 FINANCIAL STABILITY & INTEGRITY

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

- 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*
- 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*
- 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
- What are the Applicant's annual liquidity, leverage, and profitability ratios, including current ratio, debt-to-equity ratio, and gross/net margin ratios?
- 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*
- 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
- 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
- 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*
- Examples and/or narratives that substantiate the applicant's understanding of and experience with Internal Controls.

G.4 COMPLIANCE

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

- Been employed by the Massachusetts Gaming Commission
- 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*
- Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth
- Withdrawn a gaming license application, in any jurisdiction – *if so, please submit a detailed description of each withdrawal*
- 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*
- Had a gaming license suspended, in any jurisdiction – *if so, include a detailed statement regarding each suspension*
- 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*
- Had a gaming license non-renewed or considered for non-renewal, in any jurisdiction – *if so, provide a detailed description of the circumstances*
- 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: Hillside (Massachusetts) LLC

SIGNATURE FORMS

Applicant: Hillside (Massachusetts) LLC

VERIFICATION AND AUTHENTICATION

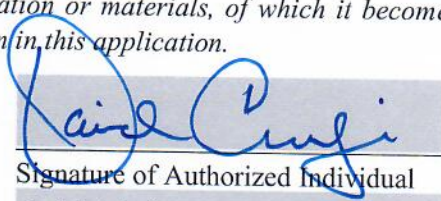
The applicant, Hillside (Massachusetts) LLC, hereby authorizes the Commission, the Executive Director of the Commission, the Investigations and Enforcement Bureau, and/or their respective designees to take all necessary and reasonable steps to verify and authenticate any information or materials submitted 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.

David Crupi

Name of Authorized Individual

President

Position with Applicant



Signature of Authorized Individual

11/18/22

Date

Applicant: Hillside (Massachusetts) LLC

ATTESTATION

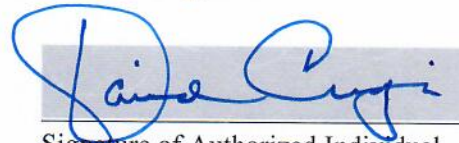
I, David Crupi, on behalf of Hillside (Massachusetts) LLC hereby swear or affirm under the pains and penalties of perjury that the information contained in this Application form and all materials accompanying said form are true and accurate to the best of my knowledge and understanding; that I have reviewed 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.

David Crupi

Name of Authorized Individual

President

Position with Applicant



Signature of Authorized Individual

11/18/22

Date

Applicant: Hillside (Massachusetts) LLC

WAIVER OF LIABILITY

Hillside (Massachusetts) LLC

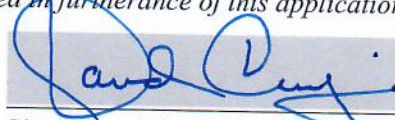
hereby holds the Commonwealth of Massachusetts and its instrumentalities and agents, including but not limited to the Massachusetts Gaming Commission and its agents, representatives and employees harmless, both individually and collectively, from any and all claims of liability for damages of whatever 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.

David Crupi

Name of Authorized Individual

President

Position with Applicant



Signature of Authorized Individual

11/18/22

Date

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

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

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

a. Background in sports wagering

First and foremost, we thank the Massachusetts Gaming Commission (herein referred to as "the Commission") for the opportunity to apply for a mobile sports wagering license and tell you a bit more about bet365.

To start, we are the largest mobile sports wagering brand in the world.

We are a private company based in Stoke-on-Trent, United Kingdom, founded by a sister and brother, Denise and John Coates, in 2000. We took our first mobile sports wager in 2001, operating with eight employees out of a portable office, and have since grown to [REDACTED] employees with [REDACTED] and over 85 million registered customers.

We do not operate any retail or brick-and-mortar wagering. Our product is particularly optimized for app-based wagering on mobile phones and tablets. Having 85 million registered customers around the world means that we deal with, and accommodate, an enormous amount of traffic on our platform. We routinely support periods of traffic in excess [REDACTED]

bet365 offers betting on [REDACTED] sports, the industry's widest range of live in-game betting opportunities, and last year we offered great choice with live streaming available on over [REDACTED], offering customers the ability to watch the live event while betting; including action from all American professional leagues, and international sports including La Liga, Serie A and Bundesliga, Grand Slam Tennis, and every UK and Irish horse race.

Approximately [REDACTED]
[REDACTED] We pride ourselves on our incredibly quick bet settlement too – [REDACTED].

The bet365 sports wagering offering is available on mobile-specific websites as well as apps for both Apple (iPhone and iPad) and Android. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

In addition to our betting and gaming sites, we also have a standalone Responsible Gambling site, helping to ensure that our customers are aware of the tools and features that they can use for a safer gambling experience such as Deposit Limits and Time-Outs.

bet365 is regularly recognized by media and industry associations as a leader. bet365 has been the winner of many awards including on multiple occasions the eGaming Review Operator of

the Year and Sports Betting Operator of the Year, and has been ranked #1 in the so-called 'Power 50' on 9 occasions as a result of our reputation and influence within the industry.

We fully expect to operate over the next 20 years in the same manner as we have for the last 20 – privately owned and family owned, exclusively using our own brand, and with an innovative, mobile-first product that has customer protection through responsible gambling at the core of our sustainable business model. The longevity we have had thus far, and that we believe we will continue to have, is attributable to several factors. Above all, it is perhaps most attributable to our extremely strong financial standing. [REDACTED]

We have no plans to sell the company, merge the company, or to take the company public. All of these factors contrast sharply with many of our competitors who are highly leveraged and dependent on outside investment to maintain their business and fund operations. Being completely debt-free allows us the financial stability and flexibility to sustain operations however we need to, without relying on outside investments. If licensed, bet365 would be an operator that is “in it for the long haul” in Massachusetts, with very little likelihood of a merger or acquisition resulting in the loss of our license, and an even lower risk of financial instability that could threaten our operational ability. In a market that is constantly evolving and still in its infancy in the United States, we’re not going anywhere.

Having this long-term focus allows us to take a long-term approach to building our brand in new markets. This is important because it allows us to play our part in fostering what we will refer to throughout this document as “sustainable markets,” which drive long-term revenue and protect mobile sports wagering customers. We don’t need or wish to bombard customers with untruthful advertising or deceptive promotions that end up causing harm and casting a negative light over the industry. We believe a conscientious, truthful, and disciplined approach to responsible gaming and responsible advertising is critical to helping the Massachusetts market avoid missteps that have occurred in other markets. By way of example, we worked very closely with the Alcohol and Gaming Commission of Ontario and were key influencers in helping them develop their Standards for iGaming which includes strong rules around truthfulness and placement of advertising of Bonus offers.

We believe that our two decades of success helping foster these types of sustainable markets combined with our proprietary, in-house technology platform gives us market-leading experience and makes us well-suited to contribute to an enduring Massachusetts mobile sports wagering market, while also providing a superior and competitive mobile sports wagering experience for Bay Staters.

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:

b. Experience and licensure in other jurisdictions with sports wagering

[REDACTED]

Given our global footprint, we have extensive experience launching in jurisdictions across the world, as well as in the United States.

We have operated mobile sports wagering and online casino gaming in New Jersey for three years and in that time have substantially grown our mobile sports wagering market share. Our product has already been recognized by industry stakeholders ranging from eGaming Review (EGR), Sports Betting Community (SBC), and Eilers & Krejcik Gaming. In September we launched operations in Colorado [REDACTED]

[REDACTED] Among these efforts are a major investment in the delivery of our sports wagering content, the bolstering of our already robust global hardware infrastructure to ensure stability and speed-to-market, and advancements to our software to allow even greater flexibility in jurisdictional and regional personalization.

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:

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

bet365 has entered in a revenue sharing partnership [REDACTED] and plans to offer mobile sports wagering as a Category 3 licensee. A copy of the agreement between bet365 [REDACTED] application as document B1-c-01.

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:

d. Intention to limit participation in any allowable sports events

While bet365 offers more sports, more competitions and more matches than any other sports wagering site, we also have strict rules by which we assess the suitability of an event in order to protect the contestants, our customers and the integrity of sport. For an event to successfully make through our core suitability requirements, it has to be:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Prior to making a sports wagering league or Sports Wager type available to customers in the system, a review will be performed of the prohibited and approved leagues and wager types, as made available by the Commission.

Once it has been confirmed that a league and wager type is approved to be offered in Massachusetts, bet365's trading teams can go about building the market and creating the lines and odds which will eventually be offered to the customer as a wagering opportunity. Until these confirmatory steps are performed, the wager types or markets will not be available in the bet365 system for those customers accessing the site while located in Massachusetts. bet365 would anticipate offering all allowable sports events and not limiting its offerings from what is permitted by the Commission.

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

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

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

This section is not applicable to our application because bet365 is a Category 3 Applicant.

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

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

As an operator, bet365 has the luxury of being the only customer-facing product that the bet365 platform supports. That platform is solely owned, developed, maintained and operated by [REDACTED] staff. It powers a customer journey that is optimized for the mobile sports environment, and it provides a technical infrastructure that satisfies the complex regulatory requirements and customer demands of a truly global platform. This includes the platform's capacity to manage exceptionally high volumes of traffic and [REDACTED]

Our platform was purpose-built for mobile sports wagering customers from its inception. We believe preserving a world-class customer experience is essential. We continually add new features to our product with the aim of creating greater customer value. Our platform in the U.S. allows for single-account sign-on across different states to ensure a seamless experience for customers no matter where they are located. Dedicated in-house customer service, product and information technology teams routinely respond to customer feedback, monitor changes in industry and market trends, and capitalize on innovations in technology. [REDACTED]

[REDACTED] events, and are protected by a robust fraud and risk monitoring process.

While the platform has evolved over time to maintain its speed and efficiency, it has held true to our key values of reliability and adaptability.

Reliability is key to our platform's well-established track record of managing enormous amounts of traffic and [REDACTED] with no major downtime or data breaches. Customers wager with bet365 because they know they can count on our storefront to be open and operational no matter what. Our various internal departments from customer service to regulatory compliance are well-versed in responding to circumstances as needs arise, and our existing and forthcoming data centers will further ensure our platform stability.

Our adaptability helps us evolve with customer demands and improve the customer-facing product, while also quickly configuring systems and processes to accommodate regulatory and compliance requirements. With licensed operations in over [REDACTED], we cater to an ethnically and culturally diverse customer base that mirrors Massachusetts's own demography. This is why offer our product in 21 languages, have the most customizable odds feeds based on local preferences, and promote the widest array of wagering markets.

We are constantly innovating our platform by taking note of trends in customer adoption across not just the mobile sports wagering industry but across all customer-based industries. This allows us to help ensure that our customers receive the best possible user experience we can deliver for their device type. This constant innovation is part of what we attribute the 8 million downloads of our app to, including just over 1 million downloads in 2020.

When millions of people from different parts of the world are utilizing your platform, it is critical that you make your product offering flexible, customizable and as geographically

relevant as possible so that you appeal to as broad a customer base as possible. It is no different in Massachusetts, one of the most diverse states in the U.S. and a veritable melting pot of cultures, ethnicities, languages and sports. If licensed in Massachusetts, bet365 would be committed to offering a wagering experience that is as authentic and as adaptable as possible for all its residents – not just those born in the U.S. We currently do this by offering our platform to all customers in 21 different languages and counting, including the most prevalent non-English languages spoken in Massachusetts, like Spanish (10.5% of Massachusetts residents) and Portuguese (3.2%).¹

For those native speakers who are interested in wagering on their home country's events in addition to their adopted home's Red Sox, Celtics, Bruins or Patriots, we will have the largest catalog of events from across the globe to cater to them between innings, periods or quarters. We offer as deep and experienced of trading markets for the NBA, MLB and the NFL as we do for over [REDACTED] Italian basketball leagues and competitions.

Because of our prowess when it comes to live streaming, Spanish or Portuguese-speaking customers will be able to stream countless events from their home country and around the world on our platform while they bet – which means bet365 becomes not just the platform they bet on, but the TV on which they watch the games they bet on. When they're wagering, they're not just able to do so in a language and on events they're most familiar with, they're able to do so in the odds format they are most familiar with. Sure, your average Bay Stater might be most familiar with American Odds, (e.g. -110). But Spanish or Italian ex-pats might be more used to Decimal Odds (e.g. 1.91) or Fractional Odds (e.g. 11/10).

Massachusetts deserves a sportsbook that is as culturally and ethnically diverse as the state itself. Whatever their preference for sports, league, language, geography or odds, bet365 will have all 21-and-older Bay Staters covered.

We successfully engage and retain players not just through the breadth of options our product offers but also by offering strategically valuable and relevant promotions and bonuses, which we detail in **Section E.2**, which covers our Advertising and Promotional plans.

Several elements of our platform offer customers industry-leading innovations to make the mobile sports wagering experience more customizable, adaptable and engaging. Our customers take advantage of these features at a consistently high rate.

One such feature is our Cash Out feature, which we were among the first operators to develop. The Cash Out feature gives customers more control over their wagers and offers an opportunity to make money on a wager before that wager has "won." For example, say a customer wagered \$50 to win \$45 on the New England Patriots to beat the Philadelphia Eagles, and the Patriots led the Eagles 24-21 at the start of the fourth quarter. If the Cash Out feature was enabled then a customer could choose to "win" their wager at the start of the fourth quarter, before the Patriots had actually won the game, in exchange for a payout slightly less than \$45. As soon as the customer chose the Cash Out feature, the winnings would be deposited in their account and the final outcome of the game would no longer matter.

Another feature that complements Cash Out is the Edit Bet feature. Edit Bet gives you the option to add, swap or remove selections and increase the risk on both pre-match and in-play

¹ <https://www.migrationpolicy.org/data/state-profiles/state/language/MA>

wagers. Customers can also use the feature to change their wager type to an applicable parlay option. For example, if you bet a three-team parlay of the New England Patriots, Cincinnati Bengals and Miami Dolphins to all win their respective games, Edit Bet would either allow you to increase how much you've wagered on the parlay (even after one or more of the three games had kicked off) or it could allow you to deconstruct the single three-team parlay into three different two-team parlays, thereby hedging your risk. Edit Bet is available when the Cash Out feature is available, and utilizes whatever the current Cash Out value of the wager is.

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

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

b. Overview of wagering activity

Please note due to the similarity in information to respond to the questions our responses for B.3.b and B.3.c are the same but duplicated to respond to both sections.

bet365 is both the operator and the platform, and our platform exclusively powers our mobile sports wagering product.


As the largest mobile sports wagering brand in the world, the full extent of the activity and volume across our global platform is immense. The size and scope of our global wagering activity gives us the reliability and experience that make us well-suited to operate in a

[REDACTED]

[REDACTED] We have an established track record of doing so without major data breaches or platform crashes.

Our platform is not utilized anywhere in the world to conduct in-person retail or brick-and-mortar sports wagering. Instead, it exclusively facilitates either app-based wagering via mobile phones and tablets, or laptop and desktop-based wagering via personal computers.

bet365 Global Mobile Sports Wagering Statistics – 2021	
Total sports wagering handle	[REDACTED]
Total sports wagering revenue	[REDACTED]
Total number of sports wagers processed	[REDACTED]
Total registered customers	85 million
Percentage of wagering revenue from in-play wagers (as opposed to pre-game)	[REDACTED]
Percentage of wagering revenue from phone and tablet wagers (as opposed to computers)	[REDACTED]

Total number of wagers processed per day on peak traffic days	
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We measure our platform's activity in a variety of ways, including handle, revenue and total amount of individual wagers processed. But, however you choose to measure wagering activity and wagering volume, bet365 is either at or near the top of the industry in every global category.

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

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

c. Estimated volume of wagering activity

Please note due to the similarity in information to respond to the questions our responses for B.3.b and B.3.c are the same but duplicated to respond to both sections.

bet365 is both the operator and the platform, and our platform exclusively powers our mobile sports wagering product.


As the largest mobile sports wagering brand in the world, the full extent of the activity and volume across our global platform is immense. The size and scope of our global wagering activity gives us the reliability and experience that make us well-suited to operate in a populous, high GDP-per-capita jurisdiction like Massachusetts. We know how to handle

[REDACTED]

[REDACTED] We have an established track record of doing so without major data breaches or platform crashes.

Our platform is not utilized anywhere in the world to conduct in-person retail or brick-and-mortar sports wagering. Instead, it exclusively facilitates either app-based wagering via mobile phones and tablets, or laptop and desktop-based wagering via personal computers.

bet365 Global Mobile Sports Wagering Statistics – 2021	
Total sports wagering handle	[REDACTED]
Total sports wagering revenue	[REDACTED]
Total number of sports wagers processed	[REDACTED]
Total registered customers	85 million
Percentage of wagering revenue from in-play wagers (as opposed to pre-game)	[REDACTED]
Percentage of wagering revenue from phone and tablet wagers (as opposed to computers)	[REDACTED]

Total number of wagers processed per day on peak traffic days	
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We measure our platform's activity in a variety of ways, including handle, revenue and total amount of individual wagers processed. But, however you choose to measure wagering activity and wagering volume, bet365 is either at or near the top of the industry in every global category.

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

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

d. Jurisdictions where the platform is currently licensed and operating

We are currently licensed in [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]. In many of these territories,
including the [REDACTED] we are the market leader.

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

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

e. Current integration in use with other wagering operators

The bet365 platform does not integrate with any outside operators or platforms for sports wagering. This is because our platform is a purpose-built platform, developed and maintained exclusively to run the bet365 mobile sports wagering product.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

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

f. The number of user accounts maintained

bet365 maintains a database of over 85 million registered customers and counting.

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

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

g. Estimated market share within each jurisdiction

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

View of bet365 Market Share by Global Jurisdiction – CY2020					
Jurisdiction	Issuing authority	Number of wagers in 2020	Total Handle in 2020	Total GGR in 2020	CY2020 Market Share By GGR
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

² Eilers & Krejcik NJ Sports Revenue Report, 18 October 2022

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Notes:

- [REDACTED]
- GGR is defined as gross gaming revenue before the deduction of bonuses and promos
- [REDACTED]
- [REDACTED]
- [REDACTED]



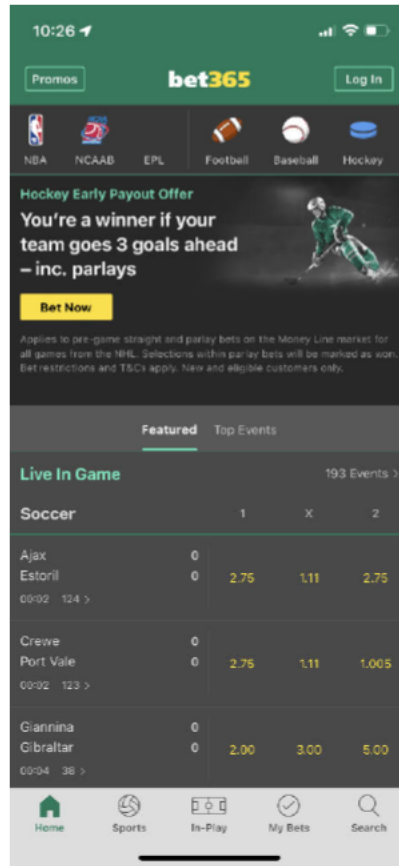
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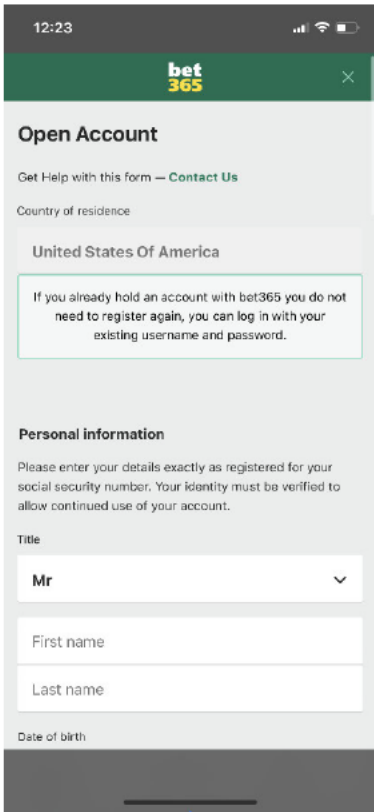
LANDING PAGE (MOBILE)

On accessing service via a mobile device, the customer will be presented with the mobile home page. The customer is able to navigate to any of the available sections of the website by appropriately choosing the area they wish to access.

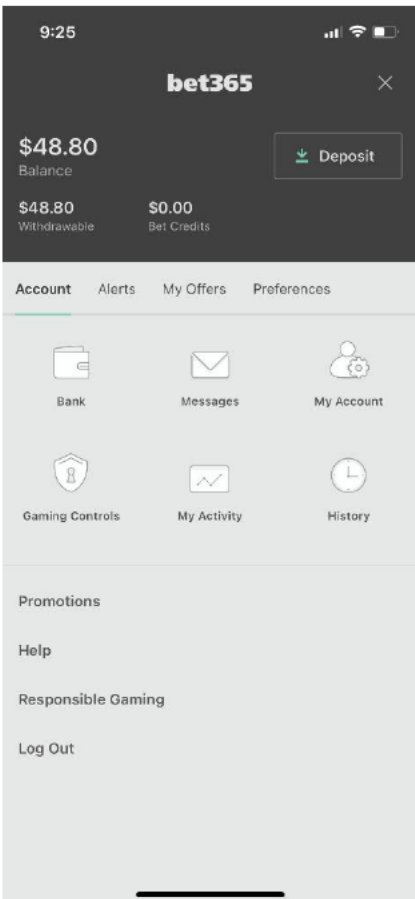
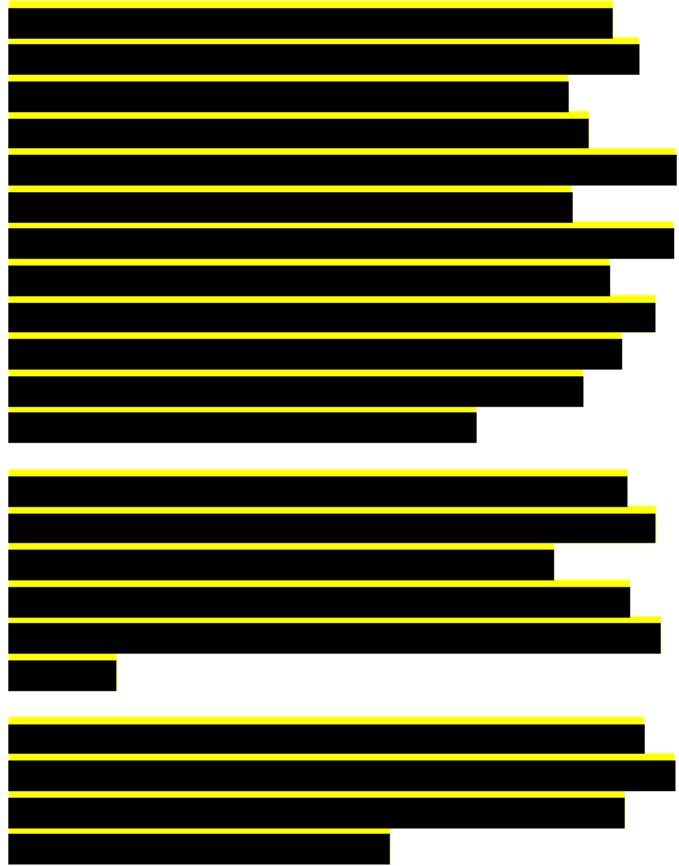


LANDING PAGE (WEB)

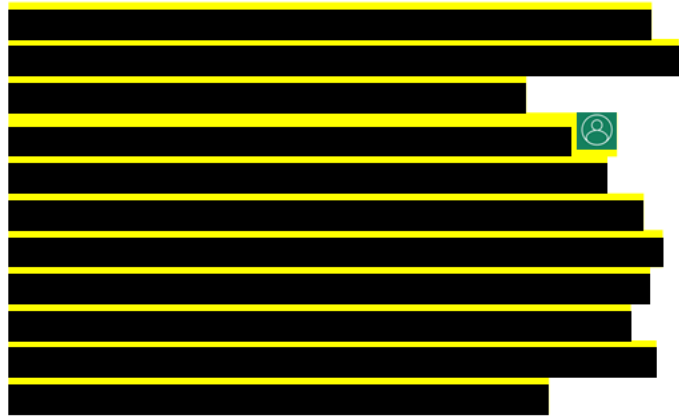


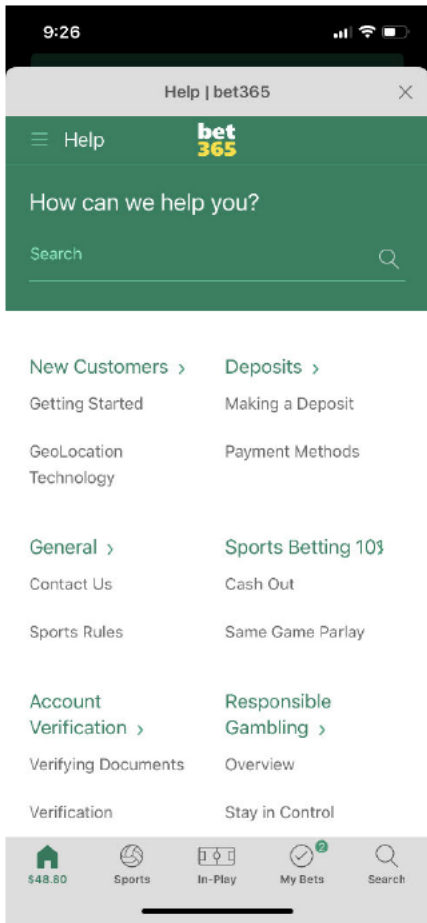


REGISTRATION



SERVICING ACCOUNTS



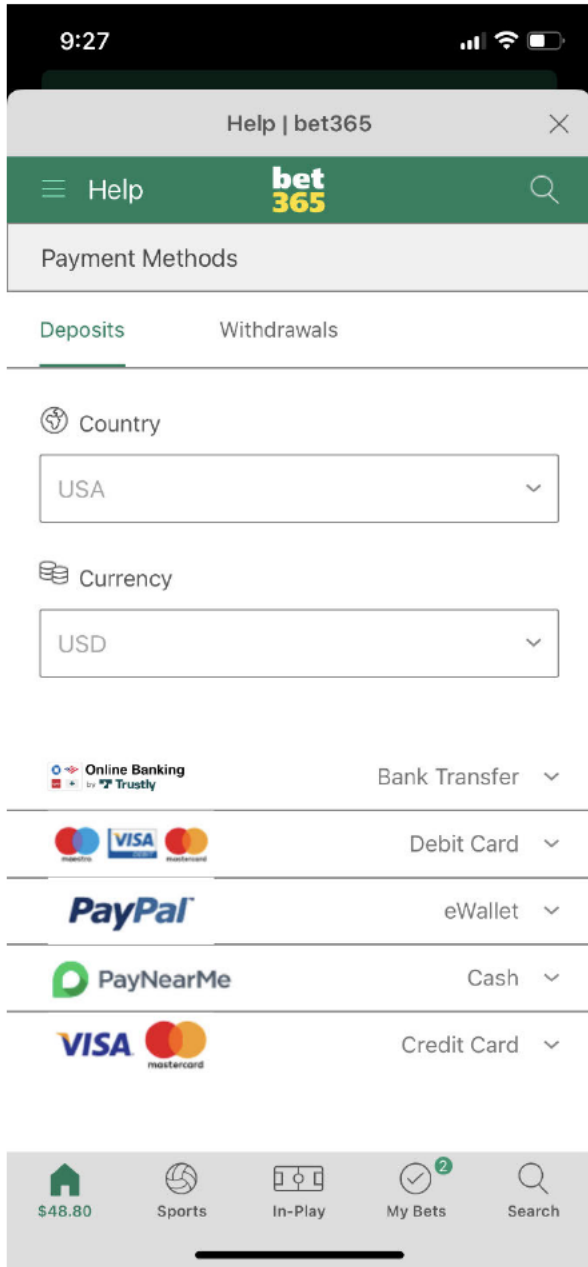


FREQUENTLY ASKED QUESTIONS

[Redacted]

[Redacted]

[Redacted]



PAYMENTS SUPPORT



RULES



☰ Help **bet 365** 🔍

Sports

2s Cash Out In-Play Promotions **Rules**

A B C D E F G
H I L M N O P
R S T U V W

[View all](#)

[American Football](#)

[Athletics](#)

[Australasian Racing](#)

[Australian Rules](#)

☰ Help **bet 365** 🔍

American Football

< Rules

Includes NFL, NCAA College Football, WLAF, UFL, CFL and Arena Football. ▾

Abandoned or postponed matches are void unless rearranged and played in the same NFL weekly schedule (Thursday - Wednesday local stadium time) except for those bets that have already been determined at the time of abandonment or postponement.

If a match venue is changed, bets already placed will stand providing the home team is still designated as such. If the home and away team for a listed match are reversed, then bets placed based on the original listing will be void.

In 2-Way markets Push rules apply unless otherwise stated below. Stakes on single bets are returned, and in multiples/parlays the selection is treated as a non-runner.

PRIVACY POLICY & TERMS & CONDITIONS

☰ Help **bet 365** 🔍

Privacy Policy

Privacy Policy (Customers)

This Privacy Policy describes the way in which bet365 deal with the information and data you provide to us to enable us to manage your relationship with bet365.

We will process any personal information provided to us or otherwise held by us relating to you in the manner set out in this Privacy Policy. Information may be provided via the bet365 website (the "Website"), telephone calls or any other means.

By accepting this Privacy Policy you agree that you understand and accept the use of your personal information as set out in this policy. If you do not agree with the terms of this Privacy Policy please do not use the Website or otherwise provide us with your personal information.

☰ Help **bet 365** 🔍

Terms and Conditions

These Terms and Conditions are effective from 09/04/2020. All previous terms and conditions are cancelled.

A. INTRODUCTION

1. By using, visiting and/or accessing any part (including, but not limited to, sub-domains, source code and/or website API's, whether visible or not) of the bet365.com website or mobile application or any other websites or applications that we own or operate (the "Website") and/or registering on the Website, you agree to be bound by (i) these Terms and Conditions; (ii) our [Privacy Policy](#); (iii) our [Cookies Policy](#) and (iv) the [Rules](#) applicable to our betting or gaming products as further referenced at paragraph 2 below (together the "Terms"), and are deemed to have accepted and understood all the Terms.

Please read the Terms carefully and if you do not accept the Terms, do not use, visit or access any part (including, but not limited to, sub-domains, source code and/or website APIs, whether visible or not) of the Website. The Terms shall also apply to all telephone betting and betting or gaming via mobile devices including downloadable applications to a mobile device (as if references to your use of the Website were references to your use of our telephone betting and/or mobile devices betting facilities).

2. Where you play any game, or place a bet or wager, using the Website, you accept and agree to be bound by, the Rules which apply to the applicable products available on the Website from time to time. The Rules can be found under the Help tab of the applicable section of the Website, or more specifically at:

bet
365

Responsible Gambling Stay in Control Support

Making sure **everyone**
gambles responsibly.

Find Out More

Useful tools to help you stay in control of
your gambling



Deposit Limits

Limit the amount you can deposit in hours and days



Reality Checks

Set up notifications to help you manage your time



Time-Out

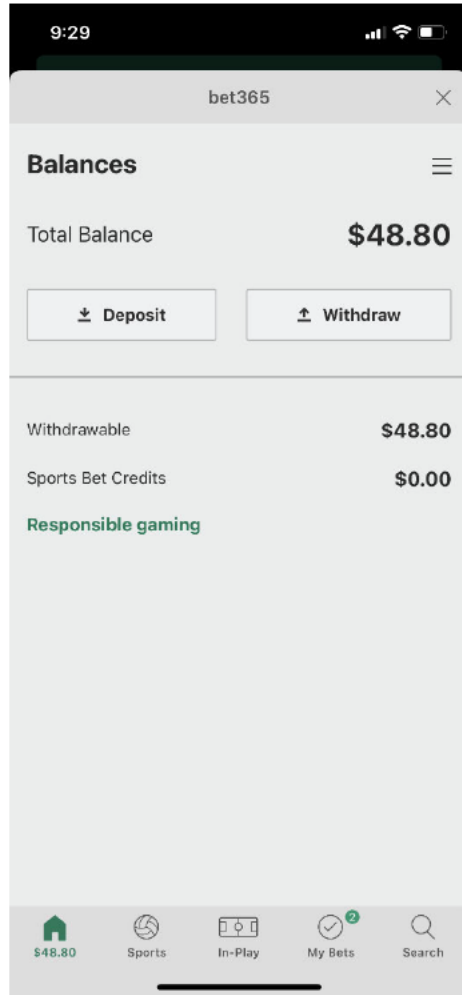
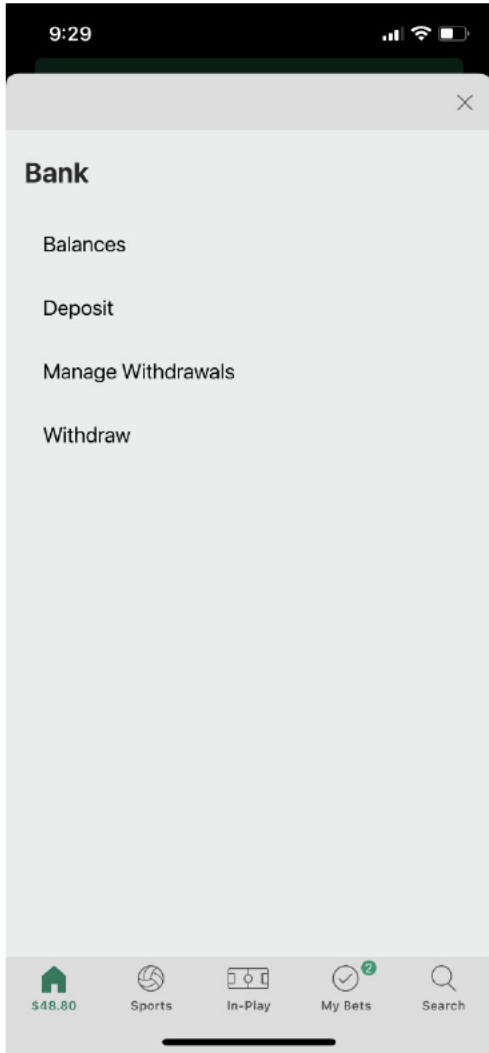
Give yourself a break from gambling

RESPONSIBLE GAMBLING

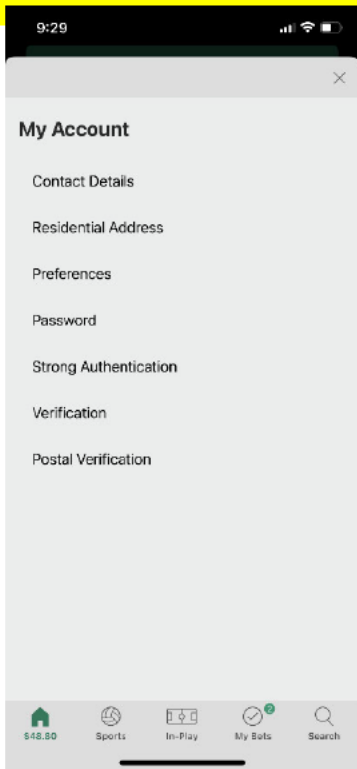
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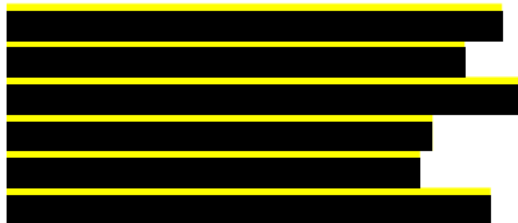
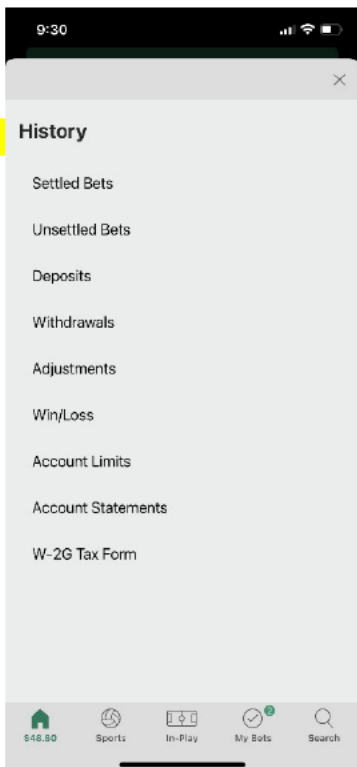
BANK



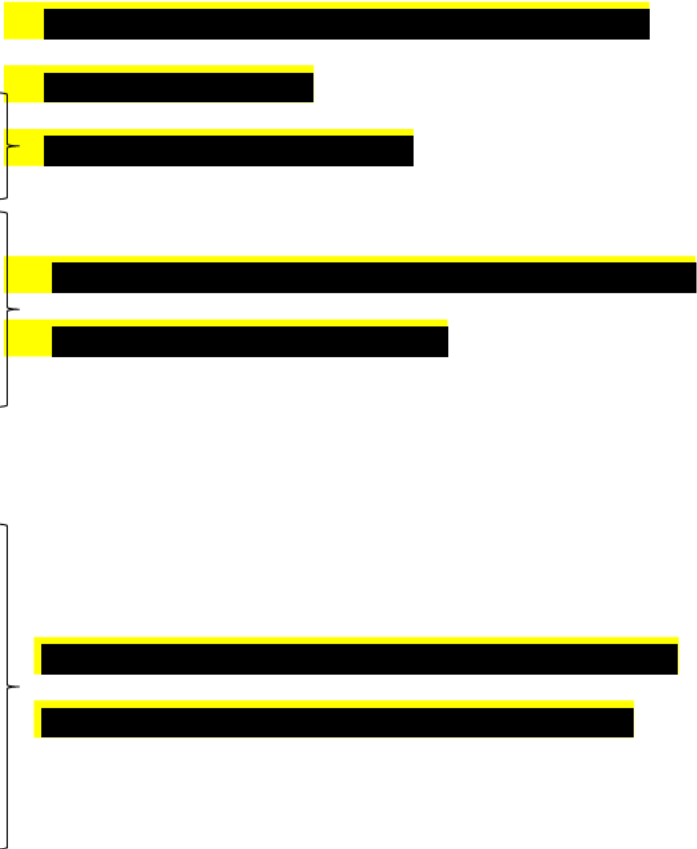
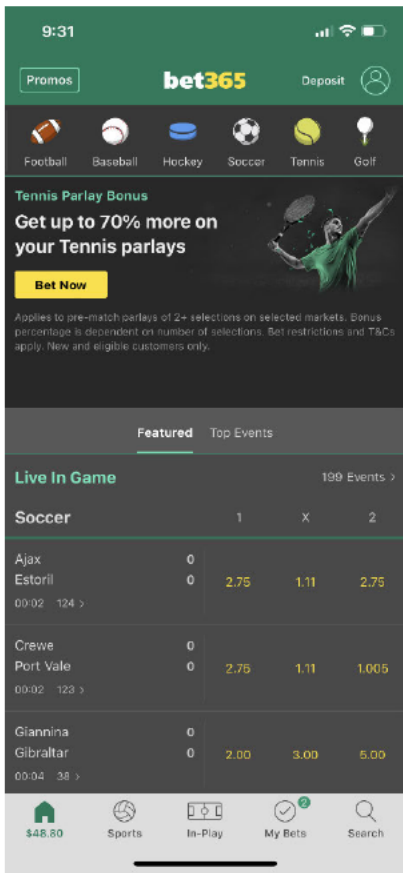
MY ACCOUNT



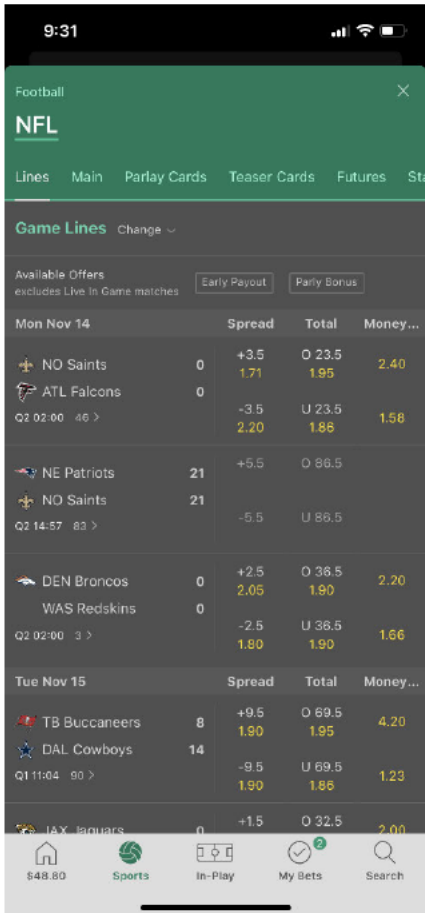
HISTORY

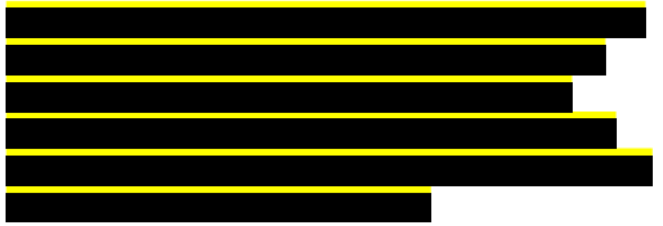
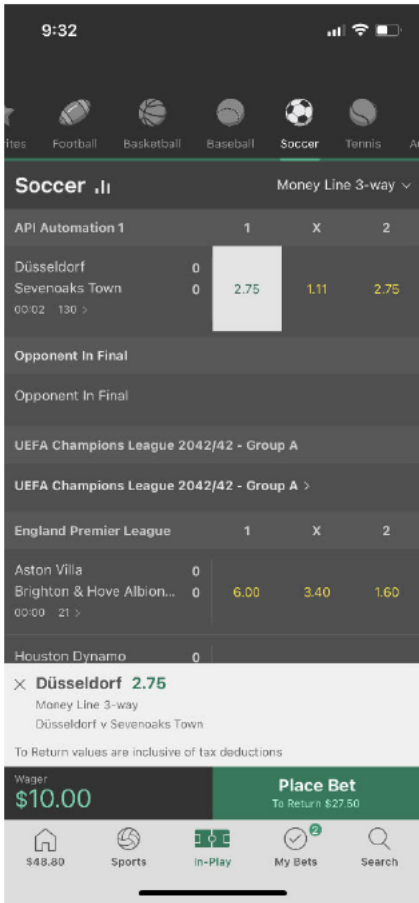


SPORTS BOOK

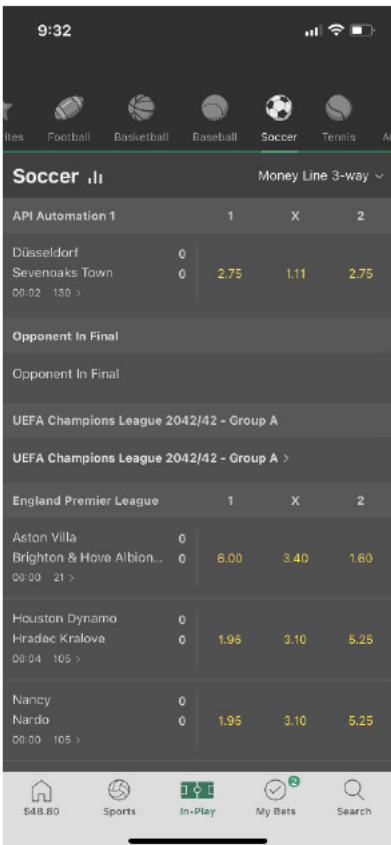


BET PLACEMENT

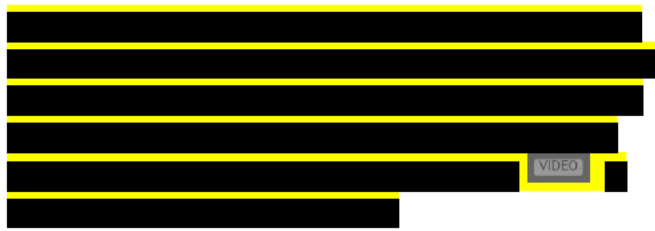
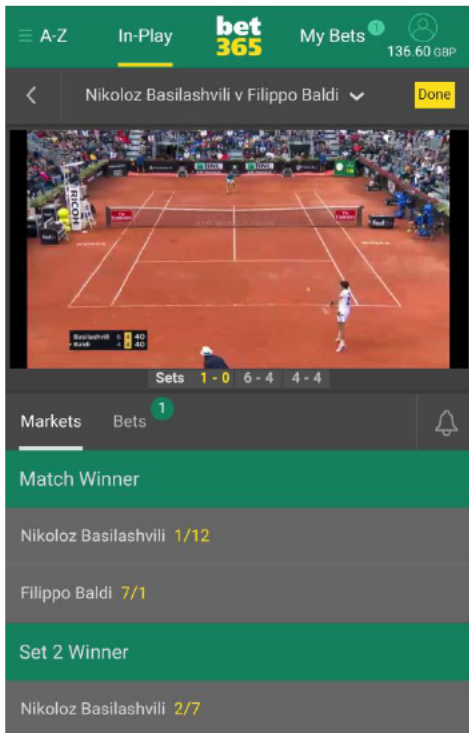




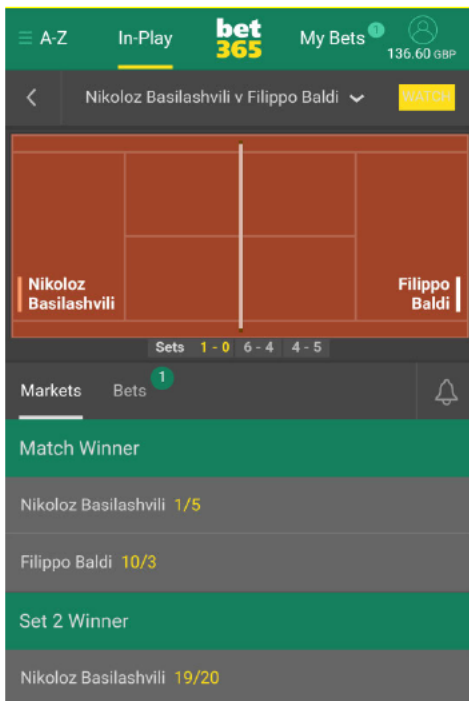
IN PLAY



STREAMED IMAGES



MATCH LIVE (ANIMATION & STATISTICS)



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:

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

[REDACTED]

In addition to the state specific certifications and approvals listed above, bet365’s sports wagering and player account management systems have also been evaluated against, and found to be compliant with, the GLI-33 technical standard. This standard is widely recognized across the US and has been a baseline for regulators in multiple jurisdictions when setting technical expectations within regulations.

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:

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

CONTINUOUS SUPPORT/MAINTENANCE

As stated above, bet365 has the luxury of having our own customer-facing product and platform that is solely owned, developed, maintained and operated by [REDACTED]. It powers a customer journey that is optimized for the mobile sports environment, and it provides a technical infrastructure that satisfies the complex regulatory requirements and customer demands of a truly global platform. This includes the platform’s capacity to manage exceptionally high volumes of traffic and [REDACTED]. This also allows for a dedicated focus on support and maintenance of the sports wagering platform without needing to rely on external partners for support.

Our platform was purpose-built for mobile sports wagering customers from its inception. We believe preserving a world-class customer experience is essential. We continually add new features to our product with the aim of creating greater customer value. Dedicated in-house customer service, product and information technology teams routinely respond to customer feedback, monitor changes in industry and market trends, and capitalize on innovations in technology.

While the platform has evolved over time to maintain its speed and efficiency, it has held true to the values of reliability and adaptability.

- Reliability is key to our platform’s well-established track record of managing enormous amounts of traffic and processing millions of wagers during major sporting events with no major downtime or data breaches. Customers wager with bet365 because they know they can count on us to be open and operational no matter what. Our various staffing departments from customer service to regulatory compliance are well-versed in responding to circumstances as needs arise, and our existing and forthcoming data centers will further ensure our platform stability.
- Our adaptability helps us evolve with customer demands and improve the customer-facing product, while also quickly configuring systems and processes to accommodate regulatory and compliance requirements. Some examples of this include us offering our product in 21 languages, having the most customizable odds feeds based on local preferences, and promoting the widest array of wagering markets.

Unlike many other operators, bet365 develops, maintains, and innovates nearly every aspect of our in-house mobile sports wagering technology platform. The absence of dependencies on external support means that we have the capability to invest with depth and agility in fulfilling industry and customer needs. It also means we can take a tailored approach, customizing our platform and business decisions to the unique interests and obligations of specific regions and markets.

To keep our global operation running smoothly and effectively, it is essential that we not only have the right tools for the job, but also the right personnel. When almost everything is

handled in-house, as is the case at bet365, that single job becomes hundreds if not thousands of jobs. But our staff of over [REDACTED] are always up for the challenge to get the job done at the highest level of excellence.

The list of software and IT departments (and their accompanying job descriptions) below encompasses the key groups that provide significant support and maintenance of the bet365 platform and ensure our product stays innovative and adaptive.

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

• [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Change Management

Change control is an absolute necessity for any organization operating in the online space. Its primary objective is to allow for beneficial changes to be made with minimum disruption to IT services while maximizing the success of planned change into the live environment and minimizing any adverse business impact of change. Another key objective of change control however is providing an audit trail for all changes to the application and infrastructure services to meet regulatory obligations and make informed decisions on how each type of change being made should be handled.

As an event wagering operator who owns our own technology stack, prides ourselves in always staying at the forefront of technical advancements, and operates a global operation, it is imperative that we have a sufficient change management process in place that adequately covers the hundreds of changes that are made to different parts of the overall system on a weekly basis. Following the release of regulations by the Massachusetts Gaming Commission, a state specific change management process will be designed to provide visibility and control to the Commission while supporting agile development and frequent change cycles when managing deployments and other changes in the regulated live production environment, all in a clear and transparent way.

bet365 has extensive experience of operating in multiple jurisdictions with differing change control demands. We have developed processes and tooling that are capable of operating change control with differing touch points, oversight and certification requirements. We are confident that we can bring market leading technology to the Commonwealth of Massachusetts and keep it up to date in line with the latest advancements within the industry, while providing the oversight that the Commission requires.

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:

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

The bet365 platform was purpose-built for mobile sports wagering customers from its inception. We believe preserving a world-class customer experience is essential and because of this we continually add new features to our product with the aim of creating greater customer value while also providing the support to our customers in the areas of responsible gaming, account protection and allowing them to provide feedback. Below are some examples of such support accessible from the bet365 site.

Responsible Gaming

Outside of ensuring all regulatory expectations set by the state of Massachusetts are being met, bet365 is committed to the promotion of responsible gaming from an educational standpoint while also providing a range of player protection measures for our customers, raising their awareness and empowering the customer to make informed choices on how to regulate and manage their wagering behaviors when needed.

[Redacted content consisting of multiple lines of blacked-out text]

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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:

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

This document summarizes the preferred sample catalog of events we would intend to offer wagering on in Massachusetts.

Leagues and competitions are listed by sport and are grouped by tier or level of competition to give a general understanding of the depth of bet365’s mobile sports wagering product. Wagering is offered regular season games, playoff games, as well as any preseason or exhibition games featuring these professional teams. Unless otherwise stated, each entry should be viewed as encompassing both men’s and women’s events for each league or sport, as well as both pre-game and in-play wagering.

Please see B4-e-01 for detailed catalog information.

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:

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

Unlike many other operators, we develop, maintain and innovate nearly every aspect of our mobile sports wagering technology platform in-house, without needing to rely on third-party vendors. Our technology platform is powered by our own in-house trading and risk management teams, our own customer account management system, our extensive fraud, customer service and AML teams, our in-house developed in-play wagering product, as well as a suite of industry-leading responsible gaming features. The stability of our technology stack means we have an established track record of processing large mobile sports wagering volumes during major sporting events, when traffic for most operators is at its peak. Our capability, experience, and our institutional knowledge it fosters, allows bet365 to be the world leader in mobile sports wagering.

This along with us having twenty plus years of global expertise, and a certified system against the GLI-33 Standards puts us in a prime position to meet any timelines established by the Massachusetts Gaming Commission for commencing mobile sports wagering.

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:

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

VALIDATION AT ACCOUNT CREATION

Before a customer can create a bet365 account for the purpose of placing a sports wager, the person’s identity is fully verified to ensure they are who they claim to be, and are at least 21 years of age. As part of this verification, information provided by the customer by a bet365 user interface is collected and sent to a verification vendor, to validate the customer’s identity and age. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

State-wide Self-Exclusion

Self-exclusion is an important step when a customer no longer feels in control of their wagering. Where a customer requests to self-exclude they can do so by adding their details to regulator supported self-exclusion list as established by the Commission.

Online Self-Restriction

As an option, customers would also have the ability to restrict themselves from placing a sports wager or accessing their sports wagering account for a specific period of time. bet365

will provide a process and maintain a self-restriction form accessible by patrons, which when completed and submitted, would restrict them from placing wagers. If a customer chooses the option of online self-restriction, bet365 will also notify the patron of any state wide self-exclusion list.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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:

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

We are constantly innovating our platform by taking note of trends in customer adoption across not just the mobile sports wagering industry but across all customer-based industries. This allows us to help ensure that our customers receive the best possible user experience we can deliver for their device type. This also allows us to add features to our site that set us apart from our competitors in the sports wagering space, some of which we have listed below.

User Focused (Customization)

When millions of people from different part of the world are utilizing your platform, it is critical that you make your product offering flexible, customizable and as geographically relevant as possible so that you appeal to as broad a customer base as possible. We currently do this by offering our platform to all customers in 21 different languages and counting.

When they are wagering, they are not just able to do so in a language and on events they're most familiar with. They are able to do so in the odds format they are most familiar with. Sure, your average Bostonian might be used to American Odds, (e.g. -110). But Spanish or Italian ex-pats might be more used to Decimal Odds (e.g. 1.91) or Fractional Odds (e.g. 11/10).

Vast Catalog

For those native speakers who are interested in wagering on their home country's events in addition to their adopted home's Celtics, Patriots, Bruins or Red Sox, we will have the largest catalog of events from across the globe to cater to them between innings, periods or quarters. We offer as deep an experienced of trading markets for the NBA, MLB and the NFL as we do for over 10 levels of men's and women's Spanish soccer, over 20 different Italian basketball leagues and competitions, and a multitude of other leagues across a wide range of sports.

bet365's dedicated team [REDACTED] makes offering this array of markets possible. More details on our proposed catalog of leagues/events and wagers can be found in our response to B.4.e.

Live Streaming

Because of our prowess when it comes to live streaming, Portuguese or Spanish-speaking customers will be able to stream countless events from their home country and around the world on our platform while they bet – which means bet365 becomes not just the platform they bet on, but the device on which they watch the games they bet on.

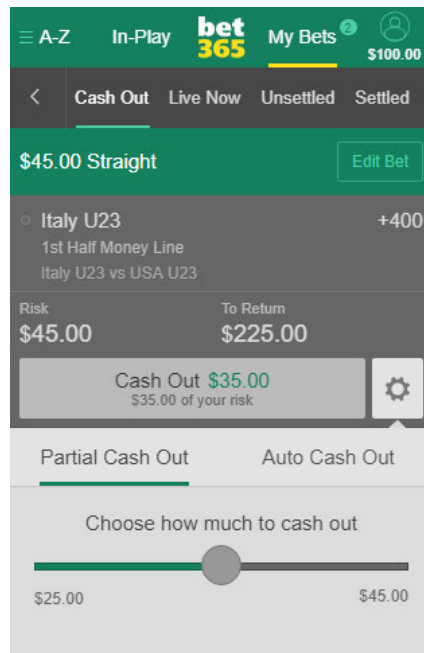
Cash Out

Cash Out, when available, gives you more control over your bets and offers you an opportunity to take a return before an event has finished. When this feature is available, you

can Cash Out a bet in its entirety or you can partially Cash Out your bet, whilst leaving the remainder of your wager to run. You can also create a request for your bet to automatically Cash Out (Auto Cash Out) where the Cash Out amount offered reaches a chosen value.

Partial Cash Out lets you take a return on your bet for a chosen amount, leaving the remainder of your wager to be settled on the final result. Simply enable the Cash Out slider by clicking on the icon to the right of the Cash Out button and selecting Partial Cash Out. You can then Cash Out part of your bet and leave the remaining wager to run.

The option to partially Cash Out a bet is available for selected straight bets, parlay bets and other multiple bet options.



SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

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

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

bet365 does not currently have any employees in Massachusetts.

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:

b. The number of current work locations within 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:

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

d. The title, job description, salary, and benefits information for all proposed positions



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:

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



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:

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

g. Description of plans for workforce development opportunities for Applicant's staff within 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:

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

Assumed Share of Massachusetts Online Sports Betting Market

Please note all calculations in this response have been derived using the methodology in G3-d-01.

bet365 expects to achieve [REDACTED] market share in Massachusetts in the [REDACTED] from launch.

Markets share forecasts are based on a combination of bet365's experience of launching its product across multiple territories around the world and the current competitive landscape of other US States.

As an example of bet365's history in successful launches into newly established regulated markets, in 2021 bet365 launched in the Netherlands, a territory in which we had no experience prior to the market going live. For the period 01/01/2022 to 06/30/2022 bet365 achieved an online sports betting market share of [REDACTED].

Projected Total Massachusetts Online Sports Betting Market Revenue

Table 1 shows the Massachusetts Online Sports Betting forecast numbers that have been used in the bet365 Massachusetts Online Sports Betting Revenue forecast.

Years 1 to 4 have been taken from the Eilers & Krejcik U.S. Sports Betting and Online Casino Outlook Report May 2022. Year 5 forecast assumes a [REDACTED] in line with the Eilers & Krejcik forecast growth rates.

Table 1.

Sm	Year 1	Year 2	Year 3	Year 4	Year 5
Massachusetts Online Sports Betting	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Bet365 Online Sports Betting Revenue Before Promotional Deductions

Table 2 shows the forecast bet365 Online Sports Betting Revenue Before Promotional Deductions, this has been calculated by using the market share expectation of [REDACTED] detailed in section 1.1 and the Massachusetts Online Sports Betting forecast numbers this is shown in Table 1.

Table 2.

Sm	Year 1	Year 2	Year 3	Year 4	Year 5
bet365 Online Sports Betting Revenue	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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:

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

Since bet365 is solely an online sports wagering operator, we will not be generating any non-sports wagering revenue.

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:

c. Projected figures for all tax revenue to the Commonwealth and methodology used to arrive at these projections

Assumed Share of Massachusetts Online Sports Betting Market

Please note all calculations in this response have been derived using the methodology in G3-d-01.

bet365 expects to achieve [REDACTED] market share in Massachusetts in the [REDACTED] from launch.

Markets share forecasts are based on a combination of bet365's experience of launching its product across multiple territories around the world and the current competitive landscape of other US States.

As an example of bet365's history in successful launches into newly established regulated markets, in 2021 bet365 launched in the Netherlands, a territory in which we had no experience prior to the market going live. For the period 01/01/2022 to 06/30/2022 bet365 achieved an online sports betting market share of [REDACTED].

Projected Total Massachusetts Online Sports Betting Market Revenue

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Years 1 to 4 have been taken from the Eilers & Krejci U.S. Sports Betting and Online Casino Outlook Report May 2022. Year 5 forecast assumes a [REDACTED], in line with the Eilers & Krejci forecast growth rates.

Table 1.

Sm	Year 1	Year 2	Year 3	Year 4	Year 5
Massachusetts Online Sports Betting	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Bet365 Online Sports Betting Revenue Before Promotional Deductions

Table 2 shows the forecast bet365 Online Sports Betting Revenue Before Promotional Deductions, this has been calculated by using the market share expectation of [REDACTED] detailed in section 1.1 and the Massachusetts Online Sports Betting forecast numbers this is shown in Table 1.

Table 2.

Sm	Year 1	Year 2	Year 3	Year 4	Year 5
bet365 Online Sports Betting Revenue	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Tax Revenue Payable to the Commonwealth

Table 3 shows the tax revenue payable to the commonwealth which has been derived by applying the Sports Betting Duty of 20%, to the Sports Betting Revenue before Promotional (Bonus) Cost Deductions as detailed in sections 1.1 to 1.5.

Table 3

\$m	Year 1	Year 2	Year 3	Year 4	Year 5
Tax Revenue Payable to the Commonwealth	■	■	■	■	■

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:

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

bet365 does not disclose segmental analysis that shows company profitability by licenced jurisdiction.. Please refer to the financial statements in Attachment 32 of the Business Entity Disclosure Form for bet365 Group Limited and in section G.3.e of this application.

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:

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*

bet365 does not disclose segmental analysis that shows company profitability by licenced jurisdiction. As an alternative, please refer to bet365 Consolidated Group statutory accounts for financial years 2016/17, 2017/18, 2018/19, 2019/20 and 2020/21 which can be found in Item 32 of the Business Entity Disclosure Form for bet365 Group Limited.

To supplement the group accounts provided, please refer to the bet365 Profit After Tax figures shown in the attached Massachusetts forecast located in G.3.d, where all costs and revenues have been considered in detail to arrive at the expected profit figure for Massachusetts operations.

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:

f. Description of methods to ensure that revenues are maximized within the Commonwealth

At bet365, we believe that the best way to maximize revenues within the Commonwealth is to build an operation that can provide long term and sustainable revenue from mobile sports wagering.

Our commitment to sustainability together with our first class product are what has allowed bet365 to become the largest mobile sports wagering brand in the world. We plan to replicate our success in Massachusetts by remaining true to the values we have employed for the past 20 years: stability and adaptability, a leading-class product backed by proprietary technology, a dedication to customer centricity, and a commitment to responsible gaming and advertising to protect our players and the people of Massachusetts.

In a newly regulated jurisdiction like Massachusetts, a cornerstone to maximizing revenues is to offer a compelling alternative to sports fans who use illegal or offshore sportsbooks. Illegal or offshore operators are able to offer price-competitive markets because of low overhead. However, because of bet365's scale, we typically offer the lowest margins in a category and successfully compete with those unlicensed operators on pricing. In fact, regardless of the jurisdiction of our customers, bet365 prices its markets globally and not locally. For example, a customer in Massachusetts who wishes to wager on the Boston Red Sox to win the World Series will see the same odds as a customer in the United Kingdom. Moreover, the payment options we have available provide more convenience to the customer versus what is available with unlicensed platform.

bet365's global experience demonstrates our ability to successfully convert customers and compete for market share against unlicensed platforms in a variety of jurisdictions. We attribute that success to our unrivaled consumer choice, convenience, competitive pricing and credibility. These factors all contribute to maximizing revenue and in turn taxes paid to the Commonwealth.

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:

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

Currently, bet365 is not operating in any of Massachusetts' nearby jurisdictions, and has no plans to at this time. Our offering in Massachusetts will be the only opportunity for sports fans to experience our unrivaled product offering and our award winning customer experience.

When our customers think of bet365, they think of live sports. We plan to market directly to Massachusetts sports fans through the channels detailed in Section E.2, [REDACTED] Paid social media activity and search engine optimization will allow us to quickly respond to the trending topics for fans and align our brand to engage new customers as well as existing ones.

We will also continue to offer the best odds and pricing while simultaneously embracing player protection through a dedication to responsible advertising and responsible play.

These strategies together will allow us to create not a competitive and sustainable offering that allows our customers to engage with us in a responsible way.

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

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

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

This section is not applicable to our application because bet365 is a Category 3 Applicant.

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

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

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

This section is not applicable to our application because bet365 is a Category 3 Applicant.

C5. COMMUNITY ENGAGEMENT

Provide a thorough description of how the Applicant will contribute to economic and business development, tourism and 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

[Redacted text block]

C5. COMMUNITY ENGAGEMENT

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

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

bet365 is a sports first brand in the United States and around the world. As set forth in the sections of this application related to advertising and marketing, we operate in a responsible and sustainable manner to attract sports fans as customers. Our approach will be the same in Massachusetts, and thus would not negatively impact customer interest in the Massachusetts State Lottery.

Anecdotally, in U.S. jurisdictions that have launched sports wagering recently, there has been little to no evidence of a negative impact on lottery or land based casino activity and we would expect this to hold true in Massachusetts. [REDACTED]

[REDACTED]

[REDACTED]

C5. COMMUNITY ENGAGEMENT

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

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

[REDACTED]

[REDACTED]

C5. COMMUNITY ENGAGEMENT

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

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

[Redacted content]

C5. COMMUNITY ENGAGEMENT

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

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

[Redacted text block]

[Redacted text block]

C5. COMMUNITY ENGAGEMENT

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

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

bet365 differentiates itself from the competition in several ways. We utilize only one brand in [REDACTED] where we are licensed. We keep that brand aligned to a singular focus: offering the very best product and experience in mobile sports wagering, an industry that the company's founders helped pioneer from humble beginnings working out of a parking lot in Stoke-on-Trent, England. The consistency of operating under only one brand has supported our expansion into new jurisdictions and we expect the same in the Commonwealth. For instance, soccer fans in Massachusetts who watch Spanish La Liga will know the bet365 brand from our partnerships with teams in that league, which will encourage them to sign up with us over other operators.

Another strategy is competitive pricing. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

bet365 also utilizes a variety of unique marketing tools to attract new customers, which are detailed in Section E.2. Among these tools are competitive offers and promotions that reflect adherence to regulations as well as our values. At bet365, we believe that customers will not stay customers for long if they feel that they are being taken advantage of, and so our strategy is not only to draw revenue from new customers but also to retain them by offering a best-in-class product and experience from deposit to payout.

bet365's award-winning marketing affiliate program also sets us apart. We partner with interesting and exciting businesses to create engaging advertising placements, like odds widgets for an event, free to play games, and original content to educate and engage our customers.

SECTION D: DIVERSITY, EQUITY, & INCLUSION

D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

The Diversity, Equality and Inclusion (DEI) Team is led by [REDACTED], Group Chief Human Resources Officer, with support from [REDACTED]. The DEI strategy is implemented by the Human Resources teams in the company’s various geographical locations.

As the company expands in the United States, we anticipate further developing a DEI team comprised from employees across the business who will represent diverse voices in the organization and work collaboratively to identify DEI priorities.



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:

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

bet365’s Equal Opportunities Policy

bet365 is committed to building an organization that makes full use of the talents, skills, experience and different cultural perspectives available in society, where people feel they are respected and valued and can achieve their full potential regardless of race, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, genetic information, or veteran status.

The aims of this policy are to ensure that:

- No one receives less favorable treatment on discriminatory grounds as set out above or is disadvantaged by any conditions, requirements, provisions, criteria, procedures or practices that cannot be justified on non-discriminatory grounds.
- No one is victimized for taking action against discrimination or is harassed or instructed or put under pressure to discriminate against or harass someone on discriminatory grounds.
- bet365 is free of unwanted conduct that could reasonably be considered to violate the dignity of workers or to create an intimidating, hostile, degrading, offensive or humiliating environment.
- Opportunities for employment, training and promotion are equally open to all.
- Selection for employment, promotion, transfer, training and access to benefits, facilities and services will be fair and equitable and based solely on merit. This policy applies to all aspects of employment from recruitment to dismissal.

bet365 will take the following steps to put the policy into practice and make sure it is achieving its ends:

- bet365’s Chief Human Resources Officer will be responsible for the day-to-day operation of the policy.
- The policy will be communicated to all employees and will be placed in bet365's Employee Handbook.
- Managers in key decision-making areas will be trained on the discriminatory effects of provisions, practices, requirements, and conditions, and the importance of being able to justify decisions.
- Complaints about discrimination or harassment in the course of employment will be regarded seriously and may result in disciplinary action, including dismissal. Any complaint should be pursued through bet365's grievance procedure.

- All applications for employment, promotion, transfer and training will be welcomed irrespective of race, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, genetic information, or veteran status. Selection criteria will be entirely related to the job or training opportunity.
- Information related to employees and applicants for employment, promotion and training will be collected and may be analyzed to monitor each stage of the recruitment process. The information will be held in the strictest of confidence and will only be used to promote equality of opportunity and prevent unlawful discrimination.

All employees are responsible for familiarizing themselves with and ensuring they follow this policy.

bet365's Harassment Policy

As part of its Equal Opportunities policy, bet365 is committed to promoting a harmonious working environment where every worker is treated with respect and dignity. No one should feel threatened, intimidated, or degraded on grounds of race, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, genetic information, or veteran status.

The policy also covers harassment that falls outside the categories referred to above that may be classed as bullying.

Harassment at work is unacceptable and will not be permitted or condoned. Examples might include:

- Racist, sexist, or ageist derogatory remarks, insults, inappropriate jokes, banter, ridicule, or taunts.
- Using a disparaging or offensive tone when communicating with people from certain groups.
- Avoiding people because of their race, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, genetic information, or veteran status.
- Having unrealistic expectations of performance or imposing excessive workloads on people, based on their race, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, genetic information, or veteran status.
- Unnecessarily picking on individuals on account of their race, religion, national origin, age, sex, pregnancy, citizenship, familial status, disability, genetic information, or veteran status.

All employees have a right to work in an environment that:

- Is free from abuse or insults
- Promotes dignity at work
- Encourages individuals to treat each other with respect
- Values politeness

- Is open and fair
- Encourages individuals to support each other

All employees should:

- Encourage a person who says they have been bullied or harassed to seek help and be sensitive to their feelings
- Refrain from taking part in, encouraging or condoning gossip about cases of alleged or actual harassment or bullying

All complaints of harassment or discrimination will be treated seriously and dealt with promptly through bet365's grievance procedure.

Disciplinary action, including dismissal, may be taken against any employee found responsible for unlawful discrimination or harassment.

All employees are responsible for familiarizing themselves with this policy to ensure compliance.

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:

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

The workforce that will support the Applicant’s operations in Massachusetts is primarily based in our Marlton, New Jersey office. The New Jersey office has a growing staff of 184 employees. Their demographics for gender and race/ethnicity are as follows:

Gender	
Male	76%
Female	23%
Non-binary	1%
Race/Ethnicity	
Hispanic	13%
White	65%
Black or African American	12%
Native Hawaiian or Pacific Islander	0%
Asian	2%
Native American or Alaska Native	0%
Two or more races	8%

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:

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

As a company that operates all over the world and employs people in multiple countries, across several languages and cultures, diversity is woven into bet365’s operations. With that unique perspective, bet365 strongly values diversity and inclusion in the workplace in the United States and around the world. bet365 cultivates workforce diversity, equity, and inclusion beginning with its hiring policies.

In addition to its equal opportunities policy, bet365 is committed to a recruitment process that welcome applicants of all ages, genders, races, religions, ethnicities, sexual orientations, persons with disabilities, veteran statuses, and other distinguishing characteristics. bet365 will seek every opportunity to post job openings on a variety of websites geared towards the recruitment of minorities, women, persons with disabilities and veterans.

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:

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

bet365 is a member of the American Association of Access, Equity and Diversity, an organization that engages in advocacy to promote and protect policies meant to ensure equity and inclusion; and has a membership pending with the National Association of Equity, Diversity and Inclusion, an organization dedicated to improving equity, diversity and inclusion in workspaces and common places.

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**

Please note that the response for sections D.2 a., b., and c. are identical because the same policy and process applies to each of the groups identified in this question.

bet365 is unique from many online sports wagering operators in the United States because it owns and operates its own proprietary trading platform and player account management system. As such, we do not rely on suppliers to provide services related to the core functionality of our platform. However, bet365 utilizes suppliers to provide important services such as age and identity verification, geolocation services and affiliate marketing. In addition to evaluating the suitability of its potential suppliers, bet365 has a responsibility to encourage positive action and impact in terms of Diversity, Equity and Inclusion (DE&I) across its supply chain. As part of the on-boarding process, we aim to encourage a supplier base with the following qualities:

- Diversity:** A diverse supplier is commonly categorized as a business that is at least 51% owned and operated by an individual or group that is part of a traditionally underrepresented or underserved group. Common examples of this are Small Business Enterprises (SBEs), Disadvantaged-owned Business Enterprises (DBEs), Minority-owned Business Enterprises (MBEs), and Woman-owned Business Enterprises (WBEs).
- Equity:** We aim to engage with suppliers who adopt the fair treatment of all employees, in terms of equal opportunities and the advancement of their people, while striving to identify and eliminate barriers that may have previously prevented the progression of some groups.
- Inclusion:** We aim to engage with suppliers who maintain an all-inclusive environment across their company, support their staff, and ensure that they feel welcomed, respected, supported, and valued enough to fully participate.

As bet365 grows in the United States, we intend to gather relevant DE&I information from potential suppliers and, where appropriate, include contractual clauses to support diversity initiatives. In order to gather such information, new suppliers will be asked the following questions when they complete our due diligence forms:

- Do you have an existing policy for DE&I in your workforce? If no, do you have plans to develop a policy?
- Does your company have any of the following certifications? If yes, please provide details
 - SME (Small Business Enterprise)
 - WBE (Women-owned Business Enterprise)
 - MBE (Minority-owned Business Enterprise)
 - DBE (Disadvantage-owned Business Enterprise)
- Please provide details of how your company provides a welcoming environment for employees who are less privileged.
- Please provide details of how your company:
 - % of women in employment.
 - % of women in senior positions.
 - % of business ownership by women.
 - % of ethnic minority in employment.
 - % of ethnic minority in senior positions.
 - % of business ownership by ethnic minority.
 - % of employees from an under privileged background.
 - % of employees from an under provided background in senior positions.
 - % of business ownership by people with and underprovided background.
 - % of employees who are ex-Armed Forces.
 - % of employees who are ex-Armed Forces in senior positions.
 - % of business ownership by people who are ex-Armed Forces.
- Please provide details of how your company actively promotes employee diversity across the business?
- Please provide details of how your company provides opportunities for employee inclusion in terms of input and actions across the business?
- Do you have an existing policy for DE&I in your supply chain? If no, do you have plans to develop a policy?

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

Provide a thorough description of the Applicant’s commitment to diversity, equality 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.

bet365 is a privately held company. The Group’s Board is comprised of:

Denise Coates CBE – Joint Group Chief Executive Officer (58.33%)

John Coates – Joint Group Chief Executive Officer (25%)

Will Roseff – Group Chief Financial Officer (6.67%)

Peter Coates – Chairman (0%)

Females in senior leadership positions include:

Based in US

██████████ – Head of Marketing

██████████ – Head of Development

Based in UK

██████████ – Head of Software Testing

██████████ – Head of Software Development

Based in Malta

██████████ – Chief Regulatory Officer

██████████ – Finance Director and Head of IT

Based in Gibraltar

██████████ – Managing Director and Global Head of Marketing Compliance

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:

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

When assessing the suitability of corporate partners and/or partnerships with local or regional entities, bet365 evaluates those entities within the context of diversity, equity, and inclusion in the following three ways:

- Undertakes a review of the potential partner's Diversity, Equity and Inclusion (DE&I) policies to ensure alignment with the DE&I policies and values of bet365;
- Requests and analyzes the workforce demographics of potential partners to ensure they represent DE&I values expressed in the partner's policies; and
- Seeks evidence of relationships developed with any local, regional, state, and/or national organisations committed to the development and promotion of diversity, equity, and inclusion.

Only entities who meet the above three criteria positively would be considered suitable partners.

SECTION E: RESPONSIBLE GAMING

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:

a. Commitment to corporate social responsibility

bet365 understands that problem gambling is a social concern and is committed to providing an environment where customers can gamble responsibly and have an enjoyable leisure experience.

bet365's commitment to uphold the licensing objectives, and comply with the regulatory frameworks within which it operates, is a vital element of its service and is key to the success of the Company. bet365 is committed to the promotion of responsible gaming and provides a range of player protection measures for its customers, raising their awareness and empowering the customer to make informed choices on how to regulate and manage their participation in betting and gaming. It is the responsibility of all employees to uphold the principles of our Responsible Gaming Plan, as well as adhere to the policies and procedures outlined in this document.

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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:

b. Support positive play

bet365 provides a range of responsible gaming tools and options to help customers manage their gambling activity and to support positive play.

[Redacted content]

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[Redacted text block 13]

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:

c. Promote public health and safety

bet365's commitment to corporate social responsibility extends to its broader daily operations and is designed to promote public health and safety. This includes the prevention of underage gambling, providing protection against vulnerable customers, and assisting patrons in need.

[Redacted content]

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[REDACTED]

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:

d. Ensure responsible advertising and marketing

[Redacted content]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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:

e. Manage high-risk financial transactions

In accordance with the prospective regulations we will implement measures in relation to the management of high-risk financial transactions.

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:

f. Engage the community

In relation to wider community engagement, we commit to regular engagement with relevant entities to inform ethical and responsible practices. We also commit to responding to community requests for participation in events and to any proposals from the academic community to engage in relevant research.

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:

g. Commitment to improvement and reporting

bet365 continually strives to improve our responsible gaming strategies and practices and report on our accomplishments.

[Redacted text block containing multiple paragraphs of blacked-out content]

E.2 ADVERTISING & PROMOTIONAL PLANS

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

a. Estimated marketing budget in the Commonwealth

[REDACTED]

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:

b. Promotion and player loyalty programs

The information below is a sampling of the variety of promotions and player loyalty programs bet365 would seek to offer in the Commonwealth.

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
--------------------------	--

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
--------------------------	--

[REDACTED] [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
--------------------------	--

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

	<p>[Redacted]</p>
[Redacted]	<p>[Redacted]</p>
[Redacted]	<p>[Redacted]</p>
[Redacted]	<p>[Redacted]</p>

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<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

[REDACTED]

<p>[REDACTED]</p>	<p>[REDACTED]</p>
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[REDACTED]

<p>[REDACTED]</p>	<p>[REDACTED]</p>
<p>[REDACTED]</p>	<p>[REDACTED]</p>

	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

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:

c. Advertising plans – *must include information for any third-party marketing firm applicant plans to partner with for advertising in the Commonwealth*

Ever since the start of operations 20 years ago, bet365 has maintained the overarching strategy to advertise as close to the live game as possible. This is most notably characterized by the ever-present perimeter signage on a soccer field; and incidentally how most customers globally recognize the brand. bet365 has co-opted this strategy for the U.S. while adapting to local preferences within the domestic sports landscape. While the marketing target can be broken up into various sub-segments, we remain focused on adults aged 21 and over in the specific jurisdiction who are actively watching, attending, or engaging with professional sports. bet365 intends to execute this strategy in Massachusetts, working with local media vendors where possible, through four main channels in order to deliver in a precise and efficient manner: brand, paid media, partners, and social media.

Brand

[Redacted text block]

[Redacted]	[Redacted]
	[Redacted]
	[Redacted]
	[Redacted]

[Redacted text block]

[REDACTED]

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] bet365 has a direct relationship with the MLB and NBA designated as an Authorized Gaming Operator within the U.S. These existing relationships have marketing benefits that include allowing bet365 to work with teams within the MLB and NBA on a sponsorship basis, which we've also utilized in other states. bet365 also works with the NFL, NHL, MLS, NCAA, various tennis and golf associations, and others via their chosen rights holder.

[REDACTED]

Paid Media

Performance paid media uses data processing and targeting capabilities to convert new and existing customers to bet365's platform and focus on adults 21 and over in Massachusetts through three tactics: paid search, YouTube, and paid social media. These tactics are traditionally deployed during key periods of the sports calendar which decreases the chance of ads appearing around unrelated intent. We strive to show advertisements only to customers who are actively looking for sports wagering content.

In the case of a new customer, their journey typically begins when searching "bet365" through a web search engine, or within the App Store or Google Play. This search query is optimized so that bet365 maintains a favorable position in the results page while endeavoring to showcase relevant copy to the user, as demonstrated below.

Ad · https://nj.bet365.com/new_customer/offer ▾

bet365™ New Customer Offer - Get Up To \$500 In Bet Credits

Get The Latest Sportsbook Odds & Offers. Download Required. T&C's Apply. 21+ **Bet** Online
With The World's Favorite Sports **Betting** Site & **Bet** On Over 500,000 Events.

Basketball Parlay Bonus

Earn Up To 70% Bonus On US Parlays.
Claim Your Bonus. T&Cs Apply.

Hockey Betting

Get The Latest Odds And
Bet On Hockey at bet365™

In the case of an existing customer or a more informed new user, a search may use less specific language like “betting lines” for a particular sport or league. It is bet365’s objective to optimize a variety of factors to ensure that the brand appears in the optimal position on the search results with other relevant copy, as demonstrated below.

Ad · <https://nj.bet365.com/basketball/betting> ▾

bet365™ Basketball Betting - Get Up To \$500 In Bet Credits

T&Cs Apply. Latest Sportsbook Odds & Markets. Download Required. 21+ Only. Join & See
Basketball **Betting** Odds With The World's Favorite Online Sports **Betting** Site.

Basketball Betting

Get the Latest Odds And Markets.
Bet On Basketball with bet365™

Basketball Parlay Builder

Use Our Parlay Builder Tool To
Customize Your Basketball Bet.

Finally, we employ a paid search tactic of utilizing competitor keywords. Specifically, this means that bet365 can aggressively bid on unlicensed competitor search terms. The ad copy is tightly controlled and encourages users to convert from unlicensed to licensed sports wagering platforms.

The YouTube strategy is a continuation of the in-place video strategy to build brand awareness, but employs more precise targeting functionality. bet365 creates brand-safe custom YouTube channel groupings that meet a criterion that is relevant to sports and content that appeals to people over 21. YouTube executes against our specifications and these channel groupings to target adults 21 and over in Massachusetts. While this is a unique strategy from other operators, bet365 has found this approach to YouTube effective in building brand awareness, while simultaneously being the safest from a brand and user perspective.

Paid social media activity promotes and aligns the brand at the forefront of the social media conversation surrounding sports wagering events and topics. This is executed by promoting the bet365 owned and operated social media channels with content relevant to the sports calendar and alignment of the brand with relevant content, typically during major events. The best example of the latter is our pioneering of Twitter’s Amplify product within the New Jersey market. In these campaigns, the NBA or MLB posts an in-game clip from their respective handles which are preceded by a six second bet365 video. This is a tactic that would be adopted in Massachusetts as the brand has found it to be effective in driving impression count.

This approach to paid media across these platforms have been highly effective for us. We are able to keep tighter control over where the brand appears and to whom it appears to, with the added flexibility to implement changes at short notice if needed.

Partner Channel

The partner channel (previously known as affiliates) typically functions as a results oriented referral product, but works within various buying structures to incentivize the trial of the bet365 product. We will work with bet365 partners to create engaging advertising placements (i.e. a widget for a relevant event), free-to-play games or develop original content to educate the market about our product and its differentiators.

These partners will help to disseminate the bet365 offer to new customers. Current examples of those partners include: USA Today/Gannett, league sites like NBA.com and NFL.com secured through official data agreements, and Bleacher Report, among others. Some of the larger global relationships, supported in 12 languages across numerous countries through the bet365 partners program, include ESPN, Better Collective, PGA Tour, Catena Media, and Verizon Media.




bet365 has over 20 years of experience in the sector and has been distinguished on several occasions as one of the world's most accredited operators. Through industry organizations, we have been voted the best affiliate program for 11 years, SBC awards winner of Sportsbook of the Year and Best Affiliate Program, as well as various awards from EGR and Global Gaming Awards.

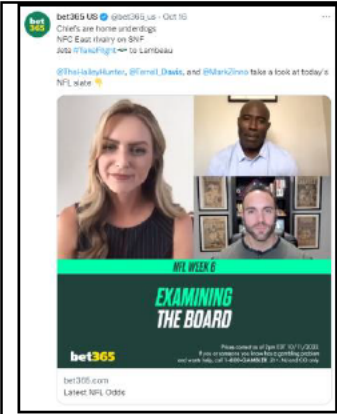
In 2022 so far, bet365 won awards for Best Affiliate Program and Mobile Sports Product at the EGR Operator Awards, Best Sports Operator at the SBC Awards and Best Affiliate Program at the iGB Affiliate London Awards for a third consecutive year.

[REDACTED]

Prior to pursuing presence in new regulated territories, bet365 acknowledges the importance of adhering to regulatory requirements. The bet365 Partners team aims to deliver a fully compliant program, complete with thorough compliance policies and guidelines, ensuring best practice with bet365 promotion.

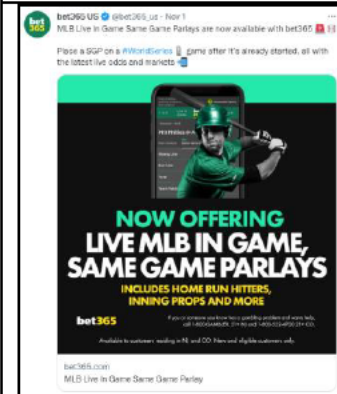
Social Media Channels

The U.S. facing social media handles ( @bet365_us,  @bet365_US and  bet365 US) launched on January 23, 2021, and have been in a growth phase ever since. We utilize these social media channels to publish topical content and sustainably increase engagements. As demonstrated below, these channels also double as a tool to highlight the bet365 product and assist in customer service inquiries.



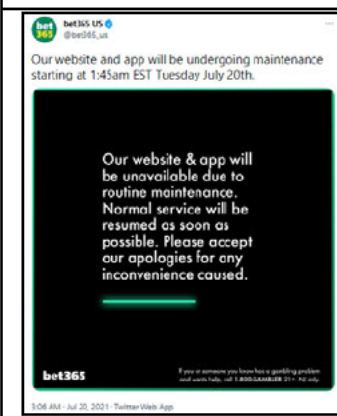
Topical Content

We approach content for the social media handles by focusing on topical sporting events in the form of engagement posts, contests or videos. Posts can often include reporting on breaking sports news, pre-match talking points (e.g. a player being left out of the starting line-up), in-play commentary, and debates around statistics or other trending topics. On occasion, the social media handles will host contests around predictions where winners are selected at random and awarded on-site Bet Credits. bet365 regularly creates and promotes video content to attract engagement and discussion. Most recently, bet365 worked with [REDACTED] and Andre Reed to develop a regularly occurring social show, which will run for the duration of the season and provide betting previews and analysis.



Product Content

We also utilize the channels to help promote bet365’s site features, offers and upcoming odds. The increase in brand awareness helps highlight where bet365’s offerings stand out from its competitors in a relevant manner. For example, during the NBA season, there will be focused posts on specific markets on upcoming games as well as showcasing the parlay builder and the early payout.



Customer Service

While bet365 has a 24-hour full service customer relations team on staff in New Jersey, the social media channels provide an additional outlet for customer interactions. On occasion, customers will post directly to social media feeds asking about general questions or any customer specific issues they may encounter. These concerns get redirected to the appropriate online help content or customer support team to ensure that our customers have the best experience possible.

With 20 years of experience in numerous global jurisdictions, bet365 has a sustainable and impactful approach to advertising. While there is an expectation for strong competition in Massachusetts, bet365 will employ a multi-channel advertising plan to acquire customers, provide them with a great experience, and achieve brand market share objectives.

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:

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

[REDACTED]

This method is most likely more conservative than most. However, as bet365 operates one global brand with the same brand used in every active territory, brand safety is of extreme importance. The marketing team is very careful to not have any placement jeopardize or negatively affect the 20+ year global reputation.

E.2 ADVERTISING & PROMOTIONAL PLANS

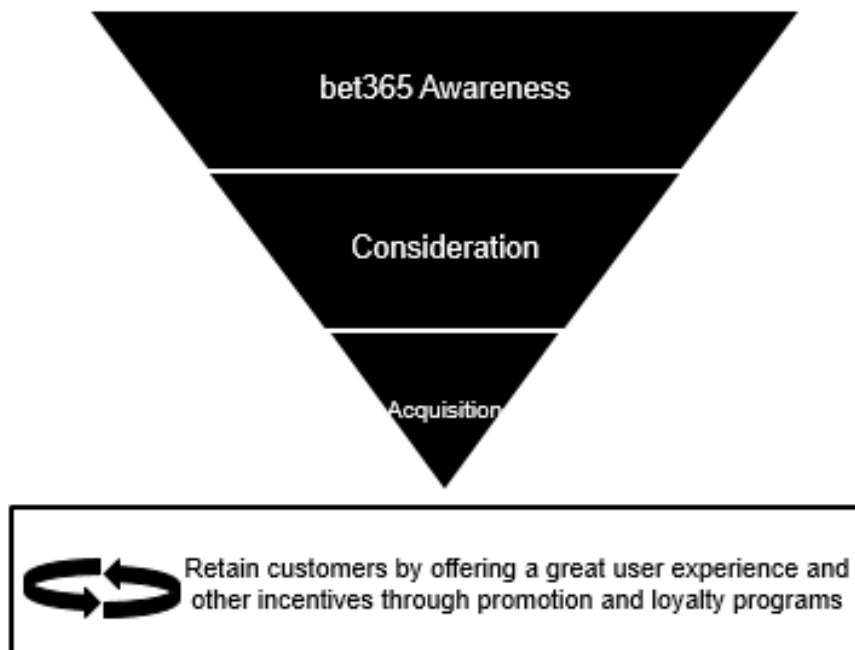
Provide a thorough description of the Applicant's ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

e. Player acquisition models – *specify minimum age to participate*

While the previous sections highlighted the specific nuances of our advertising strategy for activating within the Massachusetts market, we would like to discuss our marketing plan from a broader point of view. We strongly believe in marketing towards an audience that specifically fits the mobile sports wagering category and no broader; we understand that this not a ubiquitous approach within the industry today. bet365 designs its advertising to attract traffic to our platform by adults that are 21 and over, located in authorized jurisdictions, and watch, attend, or engage with sports.

This process begins at the highest level with brand advertising reaching qualified individuals multiple times via demographic targeting and sports content filtering. This allows us to build a saturated level of awareness of the bet365 brand and its association with live sports. Further down the funnel, targeted tactics like paid media will keep the bet365 brand top-of-mind for consumers when they search for wagering-related topics online or bet365 itself.

Lastly, while some of the video creative will include new customer offers, bet365's partners help further drive the acquisition efforts. Our partners help us execute by deploying content to help customers differentiate the bet365 platform from its competitors as well as incentivize new customers with promotional offers. Once we onboard a customer onto the platform, the promotion and loyalty programs will further drive customer retention and engagements.



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:

f. Plans to incorporate responsible gaming and problem gambling information

Per best practices, every advertisement will include disclaimers with responsible gaming and problem gambling information. Any Massachusetts specific preferences will be applied when regulations are released, but preliminarily it will say something directing people to the National Council on Problem Gambling. For example, it may say: "If you or someone you know has a gambling problem and wants help call 1-800-522-4700." A digital version will also be included on all digital banners and videos.

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:

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

The American Gaming Association recently completed a study in 2020, this study summarized the most influential factors for people to shift to legal sportsbooks which included: confidence that the wagers will be paid out (25%), awareness of legal options (20%), and a desire to use a regulated book (19%).¹ bet365's global experience demonstrates our ability to successfully convert customers and compete for market share against unlicensed platforms in a variety of jurisdictions. We attribute that success to our unrivalled consumer choice, convenience, competitive pricing, and trust.

As previously stated above, offshore, illegal operators are able to offer price-competitive markets because of their low operating overhead. However, because of our scale, bet365 typically offers the lowest margins in the category which are competitive with both legalized and unlicensed mobile sports wagering options. Regardless of the jurisdiction, bet365 offers uniform markets and odds for the same event simultaneously around the world. Moreover, the payment options we have available provide more convenience to the customer versus what is available with unlicensed channels.

bet365 has developed trust and confidence with our customer base over a 20-year period with 85 million registered customers globally. We have a history of offering positive on-site experiences, with features like timely cash outs, ease of payment options, and clear rules around account management. We take the trust and confidence of our customers seriously and conduct a thorough due diligence on our partners to ensure compliance with those we do business with. In exploring placements to ensure brand safety, if it is discovered that a website is taking advertising dollars from an offshore operator, we will bring it to the vendor's attention immediately. This protects customers from fraud, payment and legal risk while decreasing reputable marketing options for offshore, illegal operators to utilize.

bet365 offers a compelling alternative to its unlicensed competitors in developing mobile sports wagering markets. If awarded a mobile sports wagering license, customers will have no reason to look offshore for choice, convenience, pricing, and trust.

¹ "Bringing Sports Betting Consumers Back Onshore." 2020 Survey of American Sports Bettors, American Gaming Association, 21 July 2020, www.americangaming.org/resources/2020-survey-of-american-sports-bettors/.

E.2 ADVERTISING & PROMOTIONAL PLANS

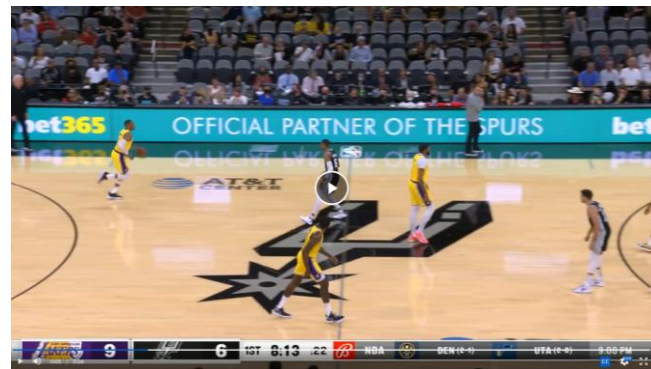
Provide a thorough description of the Applicant's ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

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

Below are a sampling of the types of marketing, advertising and promotional activity recently used in other jurisdictions.

Team Partnership Examples:





Video Commercial Example:

This example is provided separately as E2-h-01

Digital Examples:



NBA Games Schedule Watch News Standings Playoffs Teams Stats Players Fantasy NBA Official NBA TV League Pass Store Tickets

Thu, May 27 03:05:50 THT, THT OT 10:00 PM ET THT, THT OT 10:00 PM ET NBA TV FRI 7:00 PM ET ESPN 8:30 PM ET ABC 9:30 PM ET ESPN
 3 MIL 61 2 PHX 1-1 3 DEN 1-1 4 NYK 1-1 2 BKN 2-0 4 LAC 0-2
 6 MIA 45 7 LAL 1-1 6 POR 1-1 5 ATL 1-1 7 BOS 0-2 5 DAL 2-0
 GAME 2: MIL LEADS 2-0 GAME 2: SERIES TIED 1-1 GAME 2: SERIES TIED 1-1 GAME 2: SERIES TIED 1-1 GAME 2: BOS LEADS 2-0 GAME 2: DAL LEADS 2-0

bet365 New Customers **Get up to \$500 in Bet Credits** [Join](#)

Make a qualifying deposit (min \$10), place bets to eligible value, void that are not void, matched amount of Bet Credits available to use. Bet Credits are not cash. *T&Cs apply. Call 1-800-GAMBLER 21+

bet365

WATCH 1000s OF LIVE GAMES

21+ Only. Must be physically located in NJ. If you or someone you know has a gambling problem and needs help, call 1-800-GAMBLER

00:00:00 00:48:00 01:36:00 02:24:00 03:12:00 04:00:00

OVERTIME

Summary Box Score Game Charts Play-By-Play

WATCH NOW

< 37 **LIVE** 45 >

Q2 06:09

bet365

IN-PLAY BETTING

21+ Only. Must be physically located in NJ. If you or someone you know has a gambling problem and needs help, call 1-800-GAMBLER

1:48

Streaming: Backboard L >

	SUMMARY	BOX SCORE	PLAYS		
	Q1	Q2	Q3	Q4	TOT
MIL	22	15	-	-	37
MIA	26	19	-	-	45

Team Leaders

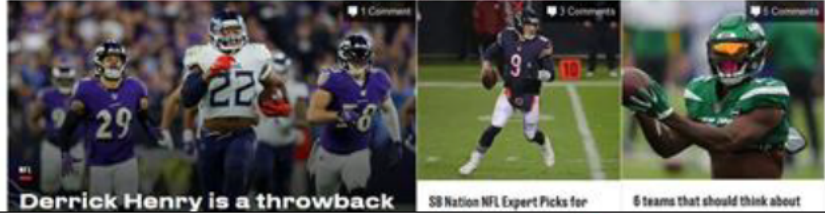
8 POINTS **11**

bet365 Download the App [Go to Store](#)

New Jersey Only. Gambling problem? Call 1-800-GAMBLER 21+

bet365 New Customers
Get up to \$100 in Bet Credits [Join Now](#)

If you or someone you know has a gambling problem and wants help, call 1-800-GAMBLER. 21+



THE LATEST

[NFL](#) [NBA](#) [MLB](#) [NHL](#)



FROM BLOODING BUCK NATION
Weapon X Mailbag: Is Travis Fulgham legit?
By [shamus_elancy](#) | Today at 8:00pm BST | 48 Comments



This club cover is the most unsettling sports accessory in history
By [James Dator](#) | Today at 12:57am BST | 2 Comments



FROM BLACK & WHITE & RED ALL OVER
Cristiano Ronaldo tests positive for COVID-19
By [Edward Patrick Akoyem](#) | October 13 |



Derrick Henry stiff-armed Josh Norman into next week
By [Rocky O'Donnell](#) | Today at 8:21am BST | 6 Comments

bet365

New Customers
Get up to \$100 in Bet Credits

Make a qualifying deposit (min \$10), place bets to deposit value, once they are settled, matched amount is Bet Credits. Available to use. Bet Credits risk excluded from returns. T&Cs apply.

[Join Now](#)

If you or someone you know has a gambling problem and wants help, call 1-800-GAMBLER. 21+

SBNATION [TWITTER](#) [FACEBOOK](#)

bet365
LEARN MORE >

If you or someone you know has a gambling problem and wants help, call 1-800-GAMBLER.

POWERED BY CONCERT

If Chicago wins they move to 5-1, contending with the [Packers](#) in determining who will win the division. Meanwhile the similar is said for Carolina who are locked in a three-way battle with New

NFL

LIVE	2:40:23
NYJ	7
SD	10

New Customers

bet365 Get up to \$100 in Bet Credits

Join

Make a qualifying deposit (over \$10), place bets to desired value, once they are settled, matched amount in Bet Credits available to use. Bet Credits risk excluded from returns. T&Cs apply.

If you or someone you know has a gambling problem and wants help, call 1-800-GAMBLER. 21+

New Jersey Only

GOLF

Tiger Woods, Dustin Johnson, Bryson DeChambeau Headline 2020 Masters Field

BLAKE SCHUSTER

bet365 New Customers Get up to \$100 in

NFL

NFL Quarterback Questions Emerging from Week 9

BRAD GAGNON

NOVEMBER 9, 2020

117



AP Photo/Chris Wedel

bet365

Bet on Football

Join Now

Gambling problem? Call 1-800-GAMBLER. 21+

Next

PITTSBURGH STEELERS ALERTS

Mason Rudolph filled in on the few snaps that Roethlisberger sat out, completing two of three passes for three yards.

bet365

Bet on Football

Join Now

If you or someone you know has a gambling problem and wants help, call 1-800-GAMBLER. 21+

"Someone hit me right on the side of the knee," Roethlisberger said (h/t Charean Williams of Pro Football Talk). "Felt like it kind of bent my knee a little bit. Part of the game of football. Guys get hit all the time. Have some discomfort and so we thought, end of the half, we'll head in and get it looked at."

Roethlisberger downplayed the injury after the game, telling reporters that he would "be fine" after the win, according to Jelani Scott of NFL.com.

Montage of Examples from Other Jurisdictions:



bet365

TOP vs MTL IMPACT PLAYER
AUSTON MATTHEWS
8 CAREER GOALS vs JAKE ALLEN

bet365

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

bet365 promotes gambling as a safe and enjoyable leisure experience and provides a range of self-help and responsible gaming awareness tools to assist a customer in gambling responsibly. bet365's Responsible Gaming Department is responsible for the creation, and dissemination of all responsible gaming related material to relevant departments.

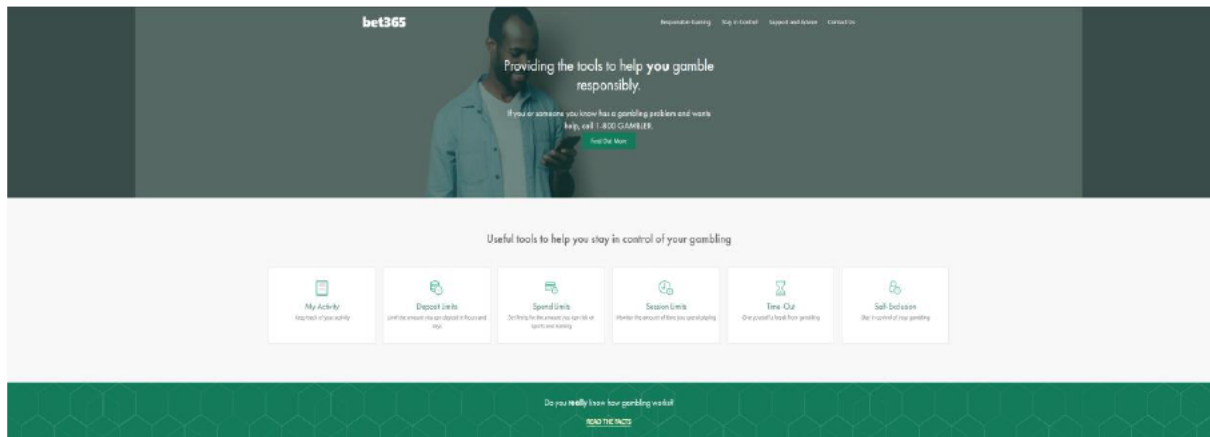
All customer-facing staff are aware of the responsible gaming information bet365 provides to customers, and are able to provide content and locations for this information to customers upon request.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

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E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

Proactive measures are in place to identify and interact with customers who may be at risk of or experience harms associated with gambling. These interactions are designed to minimize the risk of bet365 customers experiencing harm.

These systems and processes are continually improved in accordance with emerging research, industry good practice and relevant guidance.

In addition to this, bet365 recognizes that self-exclusion is an important step when a customer no longer feels in control of their gambling and therefore, customers have the option to request a self-exclusion with bet365. The self-exclusion request feature is easily accessible to customers.

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Massachusetts Voluntary Self-Exclusion Program:

bet365 is aware that the MGC must establish a list of self-excluded persons from sports wagering. Should this program be extended to online sports wagering, bet365 will ensure that it takes all steps to ensure that excluded persons are identified and denied access to bet365 service. bet365 will also ensure that the program is promoted to those who enquire about self-exclusion, or those who demonstrate signs of problem gambling. Information on such programs will be visible on bet365's Responsible Gaming Website. Finally, should the requirements established by the MGC differ from or conflict with the how items in this plan are handled, we will adjust our conduct to comply with the MGC's regulations.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

bet365 fully supports ongoing initiatives aimed at raising awareness of responsible gaming issues throughout the industry. bet365 has always sought to engage constructively with any and all regulators and relevant government agencies throughout the world in raising standards within responsible gaming.

In New Jersey, we provide data to the regulators on an annual basis to support state sponsored research by Rutgers University.

In the United Kingdom, we have engaged in a number of projects driven by the British Gambling Commission's national research program. This included working with the Behavioral Insights Team (BIT) to test customer interventions using behavioral science-informed learnings from other sectors. Additionally, we worked with the NatCen Social Research to investigate patterns of play within the online gambling sector.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

iDevelopment and Economic Association:

bet365 is a member of iDevelopment and Economic Association (iDEA), a non-profit organization whose aims include the development of industry best practices and standards around responsible gaming. More information on iDEA, can be found at <https://ideagrowth.org>.

National Council on Problem Gambling:

bet365 is a Platinum Member of the National Council on Problem Gambling (NCPG). More information on the NCPG can be found at <https://www.ncpgambling.org/>.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

GamCare Safer Gambling Standard:

GamCare is the leading provider of information, advice and support for anyone affected by gambling harms. In March 2020, bet365 was awarded an Advanced Level 3 accreditation, the highest possible accreditation, against GamCare's Safer Gambling Standard (an independent quality standard that assesses the measures operators have put in place to protect people from experiencing gambling-related harm).

In order to become accredited, businesses are required to meet an extensive range of criteria, which include items that are the foundation to building a safer gambling approach. These criteria include physical, technical, and cultural measures alongside effective leadership. Operators with Advanced Level 3 accreditation have shown that they have adopted a wide range of safer gambling measures that go beyond the basic provisions of their gambling license.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

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

The applicant is a new entity and has not received any fines, violations, citations or had corrective action required in relation to sports wagering or other gambling enterprises.

As part of the bet365 group of companies, the applicant will draw upon the group's decades of experience in [REDACTED] worldwide. That institutional knowledge will be used to govern operations, establish robust internal controls, and implement responsible advertising and marketing activity.

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:

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

bet365's mobile event wagering system is integrated with GeoComply's geolocation solution for determining the location of a player during their wagering session. If a player is flagged as being located outside of the state of Massachusetts, they will not have the ability to place a wager on the bet365 system.

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:

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**

To meet the geolocation requirements of Massachusetts statute and regulations, bet365's mobile event wagering systems will incorporate the industry proven geolocation security solution GeoComply.

[REDACTED]

This implementation of GeoComply's technology ensures that no wagers may be placed outside of the state of Massachusetts.

[REDACTED]

[REDACTED]

As a customer within Massachusetts physically leaves the state, GeoComply's solution integrated with the bet365 event wagering system blocks that individual's access to wager.

[REDACTED]

GeoComply's geolocation technology will be utilized and integrated with bet365 applications and triggered throughout a user's session during critical events.

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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:

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

For each geolocation check that GeoComply performs, a log of the complete transaction is stored and accessible from GeoComply's Hub (backoffice). This information is stored within GeoComply's system indefinitely for all geolocation requests and can be made available to regulators upon request.

Additionally, GeoComply can supply analytics dashboards to both bet365 and the Massachusetts Gaming Commission, which are useful to validate or investigate customer activity.

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:

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

Reporting of Location Data

As mentioned in the responses to prior sections, for each geolocation check that GeoComply performs, a log of the complete transaction is stored and accessible from GeoComply's Hub (backoffice). This information is stored within GeoComply's system indefinitely for all geolocation requests and can be made available to regulators upon request.

Additionally, GeoComply can supply analytics dashboards to both bet365 and the Massachusetts Gaming Commission to report attempted wagers from bet365 accounts in real-time.

[Redacted]

[Redacted]

[Redacted]

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**

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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

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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:

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

As one of the world leading event-wagering operators with a global customer-base, it is imperative that bet365 takes appropriate steps to protect ourselves from fraudulent and suspicious conduct or activity wherever possible. [REDACTED]

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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:

c. Description, location, and periodic testing of servers

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

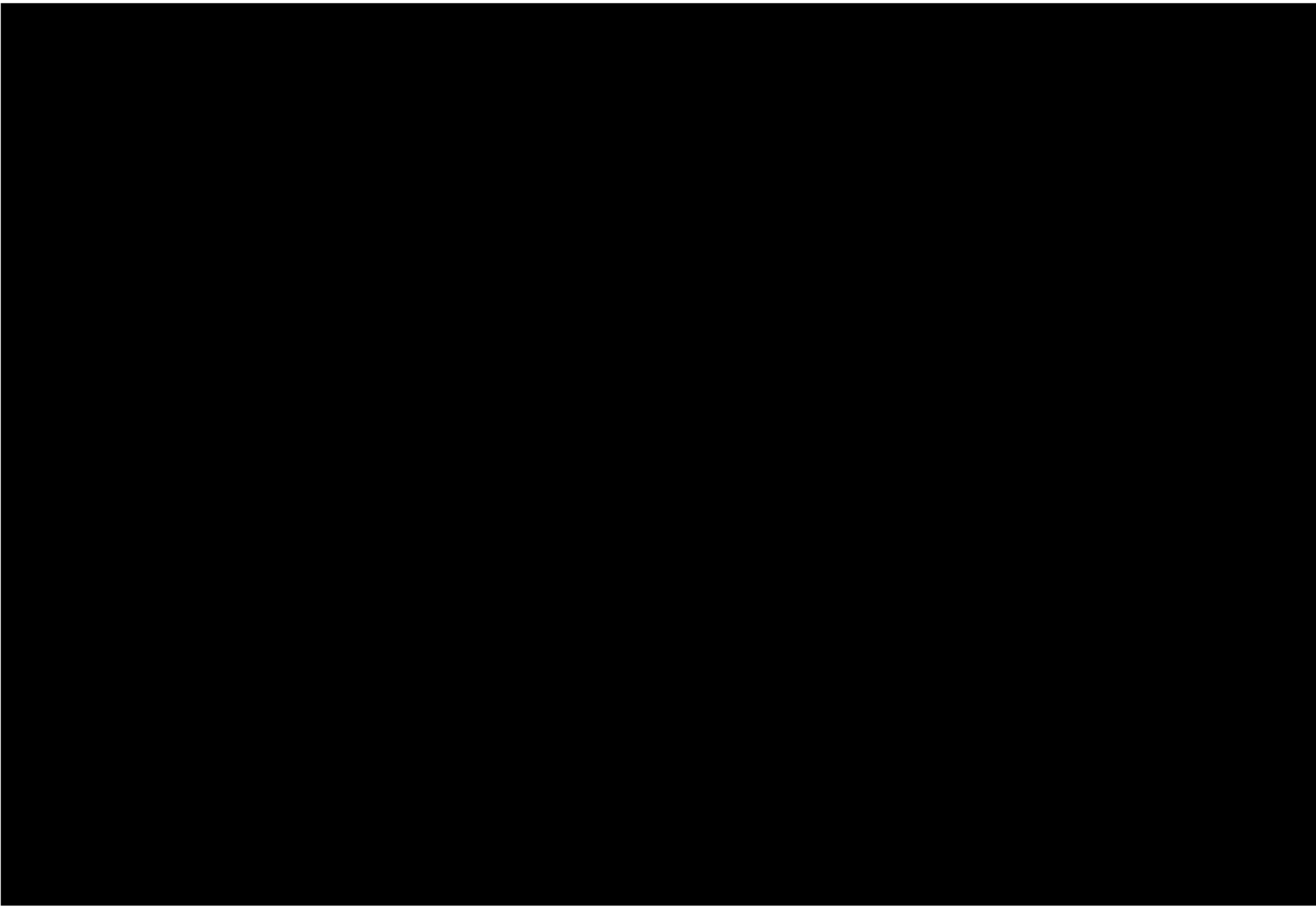
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SECTION G: SUITABILITY

G.1 SUITABILITY – CORPORATE INTEGRITY

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

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**

Business Entity Disclosure and Forms related Certifications for the following entities are included with this application:

- Hillside (Massachusetts) LLC
 - G1-a-01 – Business Entity Disclosure Form with all attachments
 - G1-a-02 – Certification Regarding Suitability
 - G1-a-03 – Certification Regarding Taxes
- Hillside (US New Media) LLC
 - G1-a-04 - Business Entity Disclosure Form with all attachments
 - G1-a-05 - Certification Regarding Suitability
 - G1-a-06 - Certification Regarding Taxes
- Hillside (New Media Holdings) Limited
 - G1-a-07 - Business Entity Disclosure Form with all attachments
 - G1-a-08 - Certification Regarding Taxes
- bet365 Group Limited
 - G1-a-09 - Business Entity Disclosure Form with all attachments
 - G1-a-10 - Certification Regarding Taxes

a. Joint Venture Agreements for the implementation of a sports wagering operation:

- 1. Other Applicants**
- 2. Businesses**
- 3. Contractors**
- 4. Vendors**

bet365 does not have any Joint Venture Agreements for the implementation of a sport wagering operation.

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**

Multi-Jurisdictional Personal History Disclosure Forms (each previously submitted to the Ohio Casino Control Commission on July 14, 2022) and Supplemental Forms for the following individuals with required attachments are included with this application:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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*

As a private company with no debt and significant cash reserves, bet365 plans to self-fund all aspects of its future operations in Massachusetts through the Group's cash reserves.

G.3 FINANCIAL STABILITY & INTEGRITY

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

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*

As an online only operator bet365, does not anticipate any construction expenses should it be granted a license to operate in Massachusetts. We will leverage our existing GLI-33 compliant platform to offer to Massachusetts residents, making any necessary updates to comply with the Commonwealth's laws and regulations. Any development costs associated with those changes would be speculative while regulations are still under consideration. We do not anticipate utilizing consultants or outside legal and professional assistance to any material degree. Our experienced in-house training staff will handle employee training for our Massachusetts operations and therefore the incremental cost of that is immaterial. Finally, at this time, we are unable to provide any marketing figures beyond those in our response to G.3.d.

G.3 FINANCIAL STABILITY & INTEGRITY

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

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

Please refer to Attachments G3-d-01 and G3-d-02.

G.3 FINANCIAL STABILITY & INTEGRITY

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

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

The table below which shows the profitability ratios of the consolidated bet365 Group for the financial years 2020/21, 2019/20, 2018/19, 2017/18 and 2016/17.

For more detail of bet365’s recent published account balance sheets, please refer to attachment G1-a-09.

	Financial Year				
	2020/21	2019/20	2018/19	2017/18	2016/17
Gross Margin %	██████	██████	██████	██████	██████
Net Margin %	██████	██████	██████	██████	██████

G.3 FINANCIAL STABILITY & INTEGRITY

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

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*

The applicant and its related companies do not have any items to report that would be responsive to this request.

G.3 FINANCIAL STABILITY & INTEGRITY

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

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

There are no reportable matters in relation to the applicant or entities owning a 5% or greater share. Please note in particular that the parent entities are non-trading holding companies with no gaming operations of their own.

G.3 FINANCIAL STABILITY & INTEGRITY

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

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

The applicant and its related companies do not have any items to report that would be responsive to this request

G.3 FINANCIAL STABILITY & INTEGRITY

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

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*

The majority shareholder of bet365 Group is Denise Coates. As a family and privately owned company, the bet365 Group does not anticipate adding additional shareholders.

G.3 FINANCIAL STABILITY & INTEGRITY

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

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

The backbone of any successful gaming jurisdiction is a set of regulations that are comprehensive without being overly restrictive. Typically, those regulations include standards for internal controls that operators and suppliers must meet prior to operating in a jurisdiction. bet365's compliance team includes a group of regulatory compliance professionals who have extensive experience working with regulators across the United States. [REDACTED]

[REDACTED] With more than twenty years of global expertise in numerous regulated markets, bet365 is confident that its technical solutions and internal processes will meet, if not exceed, all expectations set by the Massachusetts Gaming Commission.

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

Neither the applicant nor any of its Key Persons have been employed by the Massachusetts Gaming Commission

G.4 COMPLIANCE

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

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*

Copies of gaming licenses are Attachments G4-b-01 (David Crupi), G4-b-02 (Denise Coates), G4-b-03 (John Coates), G4-b-04 (Peter Coates), and G4-b-05 (Will Roseff).

[REDACTED]

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G.4 COMPLIANCE

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

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

None outside of this application.

G.4 COMPLIANCE

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

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

[REDACTED]

G.4 COMPLIANCE

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

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*

[REDACTED] Hillside (New York) LLC have identical organizational structures as the Applicant in Massachusetts. David Crupi is the President, Treasurer and Secretary of both entities.

[REDACTED]

In November 2021, the New York State Gaming Commission found Hillside (New York) LLC to be qualified for a mobile sports wagering license, but ultimately did not award the license because the Commission subsequently determined that licensure would not economically benefit the State.

G.4 COMPLIANCE

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

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

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[Redacted]

G.4 COMPLIANCE

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

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

[Redacted]

[Redacted]

[Redacted]

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G.4 COMPLIANCE

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

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

[REDACTED]

G.4 COMPLIANCE

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

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*

There are no reportable instances of unsuitability findings or non-renewal decisions.