



Sports Wagering Operator & Vendor Scope of Licensing – Initial Survey

Pursuant to 205 CMR 211.01, this survey must be submitted as part of the application for a Category 1, Category 2, or Category 3 Sports Wagering License and must be submitted as a prerequisite to the submission of the additional application forms.*

SPORTS WAGERING LICENSE INFORMATION	
Seeking to apply as:	<input type="checkbox"/> Category 1 Operator <input type="checkbox"/> Category 2 Operator <input checked="" type="checkbox"/> Category 3 Operator <input type="checkbox"/> Vendor to Operator

APPLICANT INFORMATION & DESCRIPTION	
Company Name:	Digital Gaming Corporation USA
D/B/A or Trade Name(s):	Betway
Corporate HQ Address: <i>(Also include the address of any operation/s in Massachusetts)</i>	Digital Gaming Corporation USA 1980 Festival Plaza Drive, Suite 340 Las Vegas, NV 89135
Point-of-Contact for Licensing Process: <i>(Include NAME, POSITION, ADDRESS, PHONE, EMAIL)</i>	Kimberley Sanchez, Licensing Manager 245 N. Ocean Blvd., Suite 300 Deerfield Beach, FL 33441 Phone#: (954) 854-3979
Description of Business:	Please see the full Description of Business attached.
Goods/Services you expect to provide in Massachusetts:	DGC will provide the platform, wagering information, financial services, AML, RG, and all other equipment, devices, goods, or services required to operate a sports gaming business in Massachusetts.

APPLICANT ORGANIZATIONAL INFORMATION	
Applicant Company Type:	<input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> LLC <input type="checkbox"/> Cooperative <input checked="" type="checkbox"/> C-Corporation <input type="checkbox"/> S-Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> SEC Registrant <input type="checkbox"/> Other
Publicly Traded? :	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <i>(if "Yes", Stock exchange symbol and exchange)</i>
Applicant Financial Statements Type:	<input checked="" type="checkbox"/> Audited <input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Consolidated <input type="checkbox"/> Internally Compiled <input type="checkbox"/> Externally Compiled <input type="checkbox"/> Supplemental <input type="checkbox"/> Other



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Applicant Tax Returns:	<input checked="" type="checkbox"/> Stand-Alone <input type="checkbox"/> Consolidated (<i>with</i>)
Management Structure: (Do you have any of the following?)	<input checked="" type="checkbox"/> Compliance Committee <input checked="" type="checkbox"/> Audit Committee <input checked="" type="checkbox"/> Compliance Plan <input type="checkbox"/> Other(s)

ATTACHMENTS

PLEASE SUBMIT THE FOLLOWING INFORMATION

- TABLE of ORGANIZATION** including parent companies and subsidiaries (note any companies that are publicly traded and are sports wagering-related).
- TABLE of OWNERSHIP INTERESTS** showing all ownership interests, including parent companies and subsidiaries showing the corporate structure with entity names and ownership percentages.
- FUNCTIONAL TABLE of ORGANIZATION** including the executive team and Board of Directors with individual names and titles, and percentage of ownership interest, if applicable.
- CONTROL** – List (1) individuals and entities who own 10 percent or more of the applicant; (2) individuals and entities who have the ability to control the activities of the applicant; and (3) any executive, employee or agent having the power to exercise significant influence over decisions concerning the applicant’s sports wagering operations in Massachusetts.
- INSTITUTIONAL INVESTORS** – Provide a list of these investors along with their percentage of ownership.
- LICENSING HISTORY** – List the last 3 jurisdictions in which licensed for sports wagering operations, including the type of license that was obtained.
- LICENSEE ASSOCIATION** – List any Gaming Licensee(s), Sports Wagering Operator Licensee(s) or Applicant(s) for a Sports Wagering Operator License with whom you have an agreement to conduct business or are in the process of negotiating an agreement.
- ON-SITE PERSONNEL (for Vendor only)** – If you expect to have any personnel on-site at a Massachusetts casino, please indicate the approximate number and a brief description of their duties.

**Pursuant to 205 CMR 211.01, this survey must be submitted as part of the application for a Category 1, Category 2, or Category 3 Sports Wagering License and must be submitted as a prerequisite to the submission of the additional application forms, which consist of the following:*

- Application for Category 1, 2, & 3 Sports Wagering Operator License;
- For designated entity qualifiers, Business Entity Disclosure Form;
- For designated individual qualifiers, Multi-jurisdictional Personal History Form; and
- For designated individual qualifiers, Massachusetts Supplemental Form.

Failure to submit this Survey by October 17, 2022, shall result in the Commission deeming the application incomplete and administratively closed unless the Commission authorizes an extension of time pursuant to 205 CMR 211.01(10).

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

**DESCRIPTION OF
BUSINESS**

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

DESCRIPTION OF BUSINESS:

DGC USA (DGC) is a leading licensed provider of regulated iGaming and online sports betting in multiple states within the US. On the iGaming side, DGC develops game content (both original and modified from purchased IP) and game delivery systems. On the sports betting side, DGC operates and markets sports gaming using the “Betway” brand under an exclusive US license granted by a subsidiary of SGHC Limited (Super Group) (see below). Digital Gaming Corporation Limited (DGC UK), DGC’s parent company, provides direction, financial support, IP licensing, and other services to DGC. DGC has a sister subsidiary located in South Africa which provides certain sports betting-related services to DGC, and subsidiaries in Virginia, Illinois, and Maryland that exist for licensing purposes. A NJ subsidiary provides iGaming technology.

Super Group (NYSE:SGHC) is a publicly traded corporation which is the holding company and owner of two industry leading online sports betting and gaming businesses: Betway, a premier online sports betting brand; and Spin, a multi-brand casino offering. Super Group, which is licensed and operates in multiple jurisdictions outside the US, has entered into a definitive written agreement to acquire full ownership of DGC subject to obtaining the requisite gaming regulatory approvals.

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

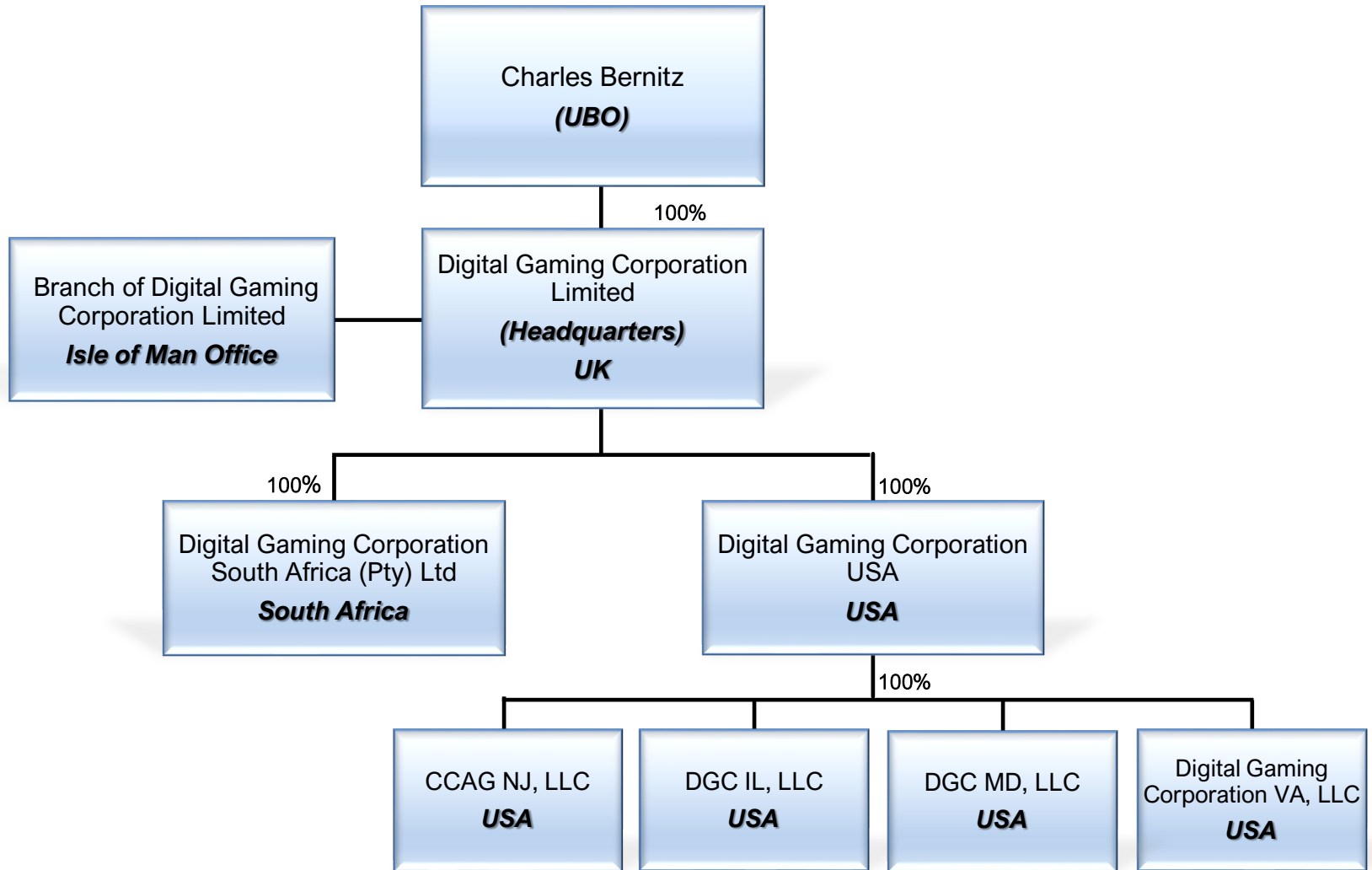
**TABLE OF
OWNERSHIP &
ORGANIZATION**

(INCLUDES FUNCTIONAL ORGANIZATION)

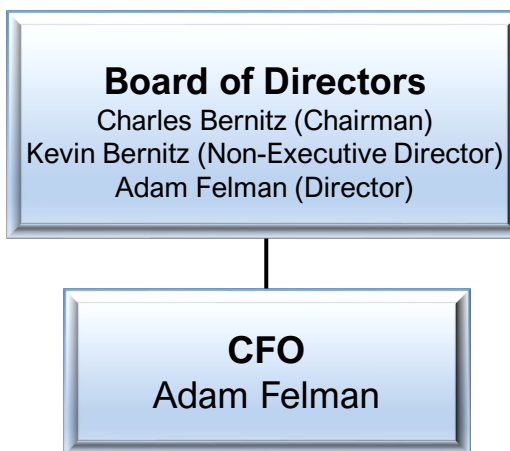


DIGITAL GAMING CORPORATION
TABLE OF OWNERSHIP & ORGANIZATION
OCTOBER 11, 2022 - (MASSACHUSETTS)

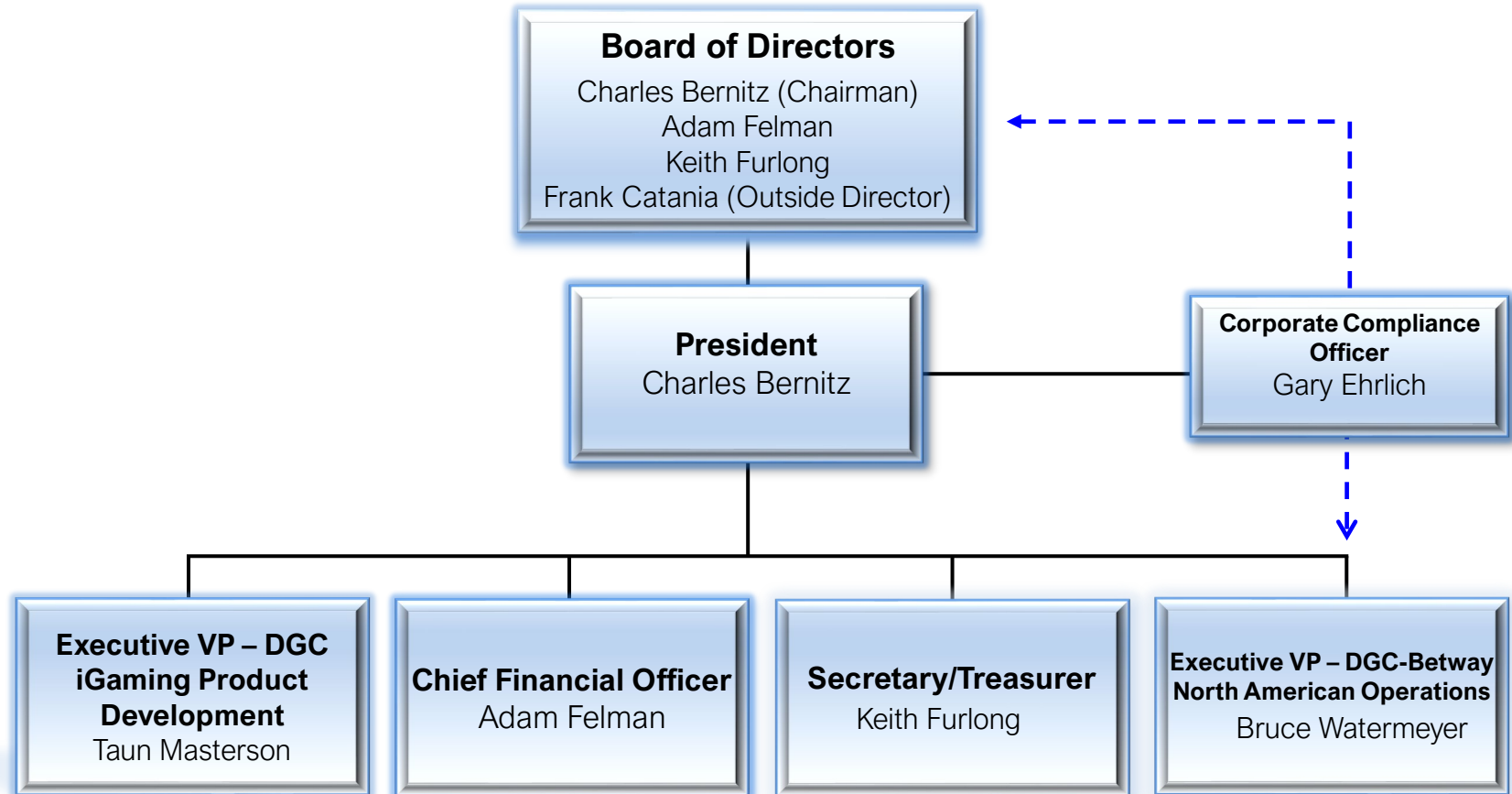
Digital Gaming Corporation – Ownership Structure



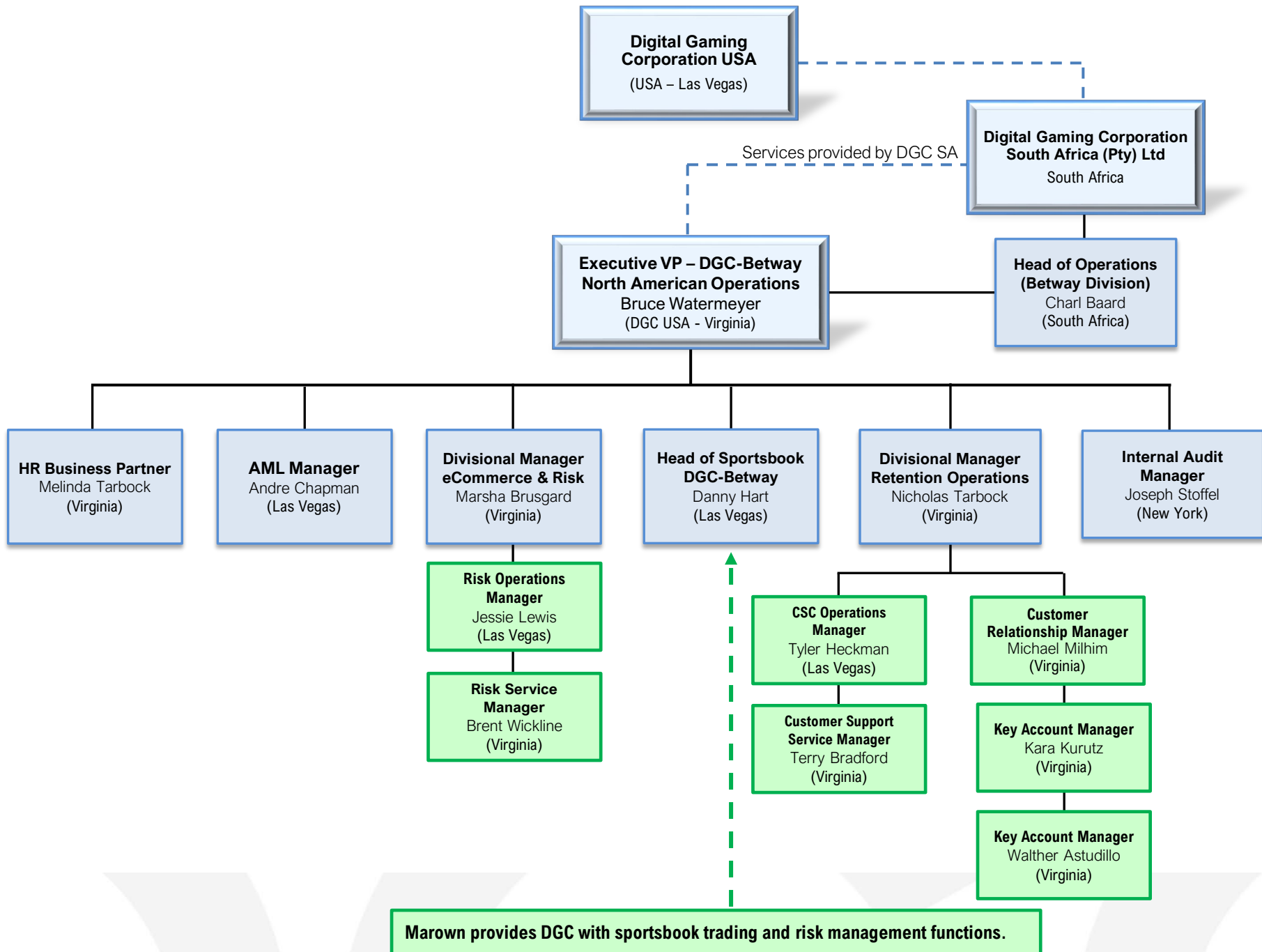
Digital Gaming Corporation Limited (DGC UK) - Organizational Structure



Digital Gaming Corporation USA (DGC USA) Organizational Structure



DGC – Betway Division - Organizational Structure



**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

CONTROL

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

Digital Gaming Corporation USA (DGC USA) – Control

- 1) As indicated in the attached table “Digital Gaming Corporation – Ownership Structure,” Mr. Charles Bernitz owns 100% of Digital Gaming Corporation Limited, which in turn owns 100% of Digital Gaming Corporation USA.

- 2) The individuals and entities who have the ability to control the activities of Digital Gaming Corporation USA are indicated in the attached table “Digital Gaming Corporations – Ownership Structure,” “Digital Gaming Corporation Limited (DGC UK) – Organizational Structure,” “Digital Gaming Corporation USA (DGC USA) Organizational Structure,” and “DGC – Betway Division – Organizational Structure.”

- 3) The executives, employees, and agents having the power to exercise significant influence over decisions concerning Digital Gaming Corporation USA are indicated in the attached tables, “Digital Gaming Corporation USA (DGC USA) Organizational Structure” and “DGC – Betway Division – Organizational Structure.”

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

**INSTITUTIONAL
INVESTORS**

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

Digital Gaming Corporation USA (DCG USA) – Institutional Investors

Digital Gaming Corporation USA has no institutional investors. Digital Gaming Corporation Limited owns 100% of Digital Gaming Corporation USA and, in turn, Mr. Charles Bernitz owns 100% of Digital Gaming Corporation Limited.

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

**LICENSING HISTORY
(LAST (3) JURISDICTIONS)**

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

Jurisdictions	License Type
Virginia	Sports Betting Permit Holder
Iowa	Advanced Deposit Sports Wagering License
Arizona	Event Wagering Designee

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

**LICENSEE
ASSOCIATION**

**DIGITAL GAMING CORPORATION USA (DGC USA)
MASSACHUSETTS GAMING COMMISSION
SPORTS WAGERING OPERATOR & VENDOR SCOPE OF LICENSING
INITIAL SURVEY (RESPONSE)**

Digital Gaming Corporation USA (DCG USA) – Licensee Association

Digital Gaming Corporation USA does not have an agreement to conduct business with, nor is it in the process of negotiating an agreement to conduct business with, a Gaming Licensee, Sports Wagering Operator Licensee, or Applicant for a Sports Wagering Operator License at this time.