

PART 6 – APPLICANT TECHNICAL PROPOSAL

This Part provides the requirements for development of the technical proposals, explains the proposal clarification process, and outlines the Application submission process. In preparation of the proposal, the Applicant should pay special attention to the requirements and information being requested to respond fully to the RFA. In cases where multiple Platform Providers and/or Operators are included in an Application, the Applicant shall provide information required by this Part in context of and including all Platforms and Operators.

6.1 EXPERIENCE

A. The Applicant shall provide a description of comparable mobile sports wagering platforms developed and operated by the Applicant. Multiple examples may be used to demonstrate experience, but the Applicant shall limit detailed examples to no more than the five most comparable Platform operations. The description shall include the following:

- an overview of the wagering activity conducted through the Platforms;
- the jurisdictions where the Applicant operates the Platforms;
- current integration of the Platforms with other wagering operators;
- the number of accounts maintained through the Platforms;
- wagering volume processed annually through the Platforms; and
- additional information the Applicant believes relevant to demonstrate the Applicant's experience:

Response:

The FOX Bet proprietary sportsbook platform is



[REDACTED]

The FOX Bet Sportsbook platform is [REDACTED]
[REDACTED]

[REDACTED] the FOX Bet Sportsbook platform [REDACTED]
[REDACTED]

The FOX Bet Sportsbook offers a wide variety of sports to bet on for customers, including major US sports (NFL, College Football, NBA, College Basketball, MLB, NHL etc.) and a large number of other sports. [REDACTED]
[REDACTED]

Within those sports, FOX Bet Sportsbook offers a wide variety of markets for customers to bet on, ranging from the result of the game itself, the total number of points scored in that game, to many other player or team 'prop' markets that can add additional excitement to the customer watching the game.

In the short frame of time operational in the US, the FOX Bet Sportsbook has become [REDACTED]
[REDACTED]

The FOX Bet Sportsbook operation is [REDACTED]
[REDACTED]

The FOX Bet Sportsbook offers a unique and personalized experience for sports wagering customers, that includes an intuitive user interface and features such as

[REDACTED]

In the array of wagers themselves, FOX Bet Sportsbook also offers the innovative

[REDACTED]

The unique and innovative

[REDACTED]

Active Players:

As of June 2021,FOX Bet Sportsbook has a total Sports-registered user base of

[REDACTED]

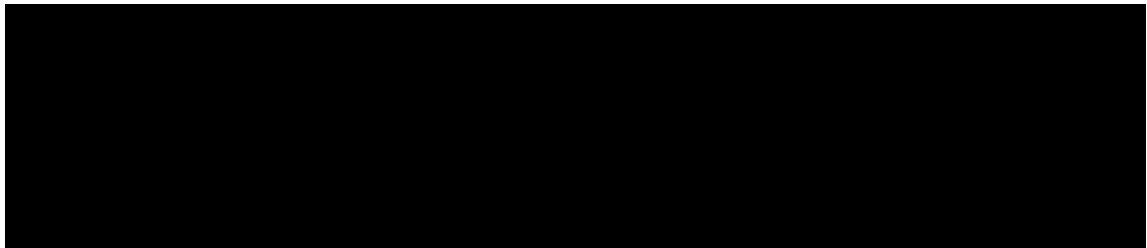
[REDACTED]

[REDACTED]

[REDACTED]



Handle / Revenue:



Market Share:

[Redacted]

[Redacted]

[Redacted]

Brand Awareness:

[REDACTED] we have
been able to leverage strong awareness of the FOX Bet Sportsbook brand within
active sports bettors [REDACTED]

[REDACTED]

Trust is one of the most important brand attributes for a legal sportsbook.

[Redacted]

[Redacted]

B. For each Operator the Applicant proposes to host on the Applicant's Platform, the Applicant shall provide a description of Sports Wagering operated by the Operator. Multiple examples may be used to demonstrate experience, but the Applicant shall limit detailed examples to no more than the five most comparable Sports Wagering operations. The description shall include the following:

- the jurisdictions where the Operators is licensed and operating;
- wagering volume of Sports Wagering;
- estimated market share within each jurisdiction;
- the Platforms currently used to accept wagers; and
- additional information the Applicant believes relevant to demonstrate the Operator's experience, including, without limitation, the Operator's experience in mobile sports wagering.

Response:

As set forth previously, the FOX Bet Sportsbook operation is [REDACTED]

FOX Bet is [REDACTED]

Bet is [REDACTED] FOX

The idea behind FOX Bet was

[REDACTED]

As far as comparisons to other operators
important ingredients for success are

[REDACTED] some of the most

6.2 EXPERTISE

A. The Applicant shall provide a summary narrative, not to exceed two pages, highlighting the Applicant's expertise in mobile sports wagering and how the Applicant's expertise is applicable to this RFA. In addition to the summary, each Applicant shall provide:

FOX Bet is [REDACTED]

FOX Bet has successfully launched and maintained mobile sports wagering platforms and operations [REDACTED]

FOX Bet's proprietary platform is [REDACTED]

[REDACTED] As more fully described below, the platform has strong operational support and monitoring, change management procedures, security, compliance capabilities, responsible gaming options, robust streaming capabilities, a full suite of sports market offerings and other customer-friendly features.

Our intense customer-centric focus shapes every aspect of our operation, and underlies its continual efforts to provide the most enjoyable gaming experience possible, in a knowledgeable, safe and supported context. [REDACTED]

[REDACTED]

- an overview of the technical features and operation of the Mobile Sports Wagering Platform;

The information requested for this Section 6.2 A is included as Exhibit 6.2 A.

- an overview of how the Applicant will provide continual support and maintenance of the Mobile Sports Wagering Platform;

For incident escalation and handling, we provide 24/7 operational support and troubleshooting ensuring stability and integrity of the platform. [REDACTED]

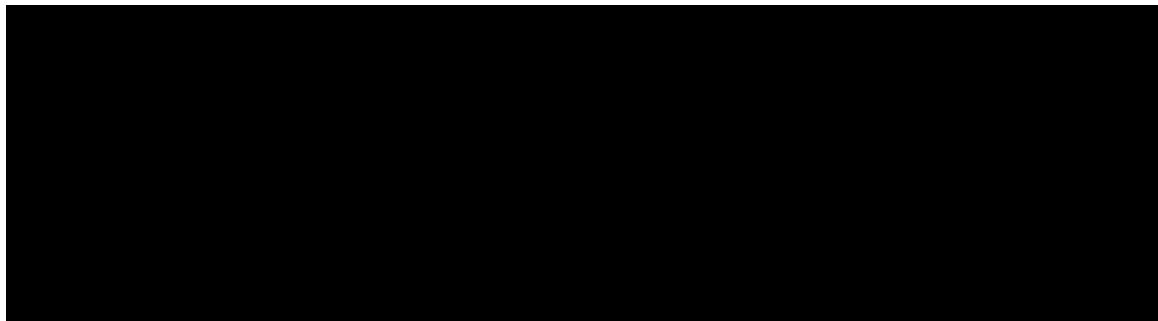
[REDACTED] Our team effectively identifies, records and classifies problems reported by stakeholders, along with their root cause to resolve them in a timely manner.

[REDACTED]

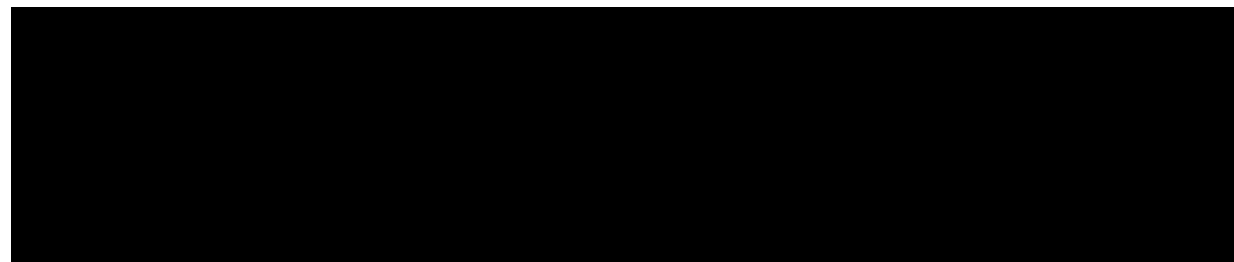
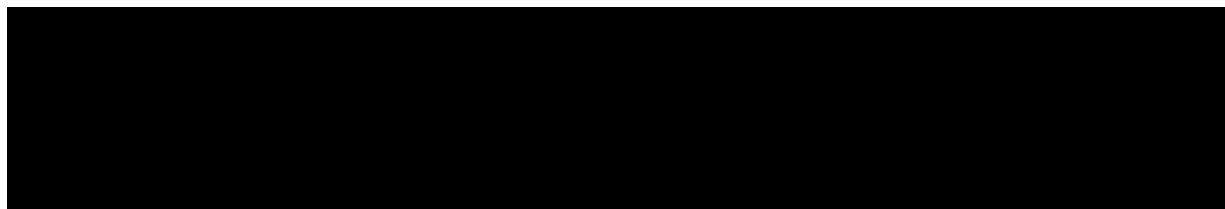
We spend considerable effort to manage the platform in conjunction with applicable licensing requirements, and we work with regulators, accredited test labs, and auditors to maintain compliance while running agile development in a highly competitive market. [REDACTED]

[REDACTED]

[REDACTED]



- an outline of the features of the Mobile Sports Wagering Platform designed to support the Operators;



All of this is done in close coordination with the licensed operator, ensuring that appropriate processes and controls are in place that allows the operator to have the control required as per regulatory and business requirements.

- an outline of any technology to be used or features offered that the Applicant believes sets the Applicant apart from other potential Applicants; and

Proprietary Technology

[Redacted]

[Redacted]

[Redacted]

[Redacted] This allows for dynamic graphic displays on the front end for partners and affiliates, maximising engagement.

Streaming

The Sportsbook is capable of live streaming sports directly within the application to enhance customer's in-game experience. In addition to live streaming, [Redacted]

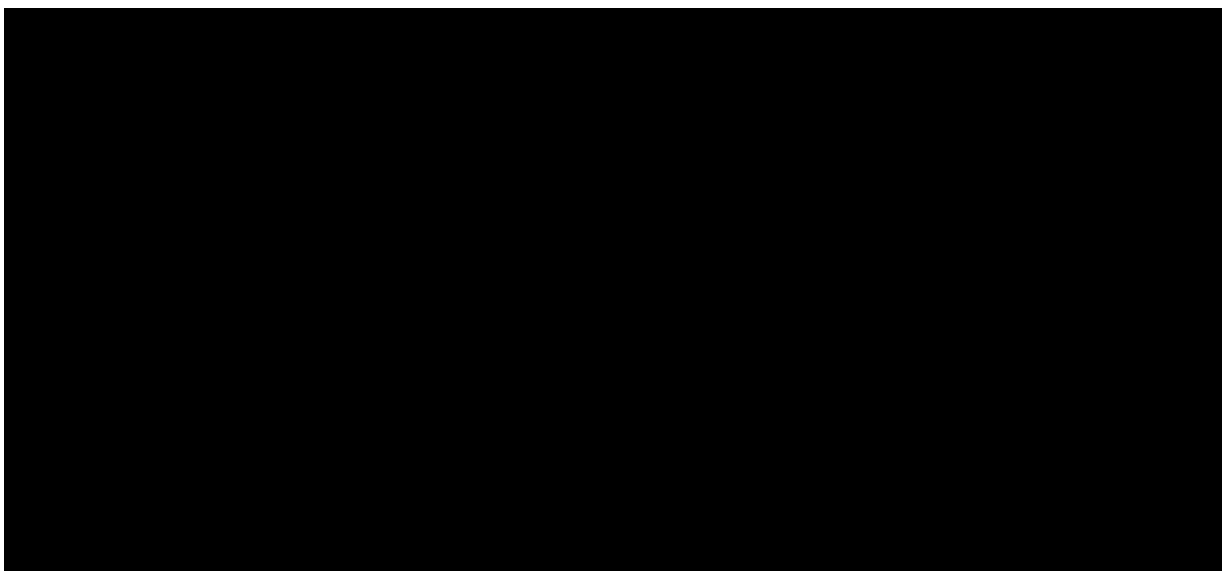
- additional information the Applicant believes relevant to demonstrate the Applicant's expertise.

B. The Applicant shall provide a summary narrative, not to exceed two pages per proposed Operator, highlighting the expertise in sports wagering that such proposed Operator demonstrates. In addition to the summary, each Applicant shall provide:

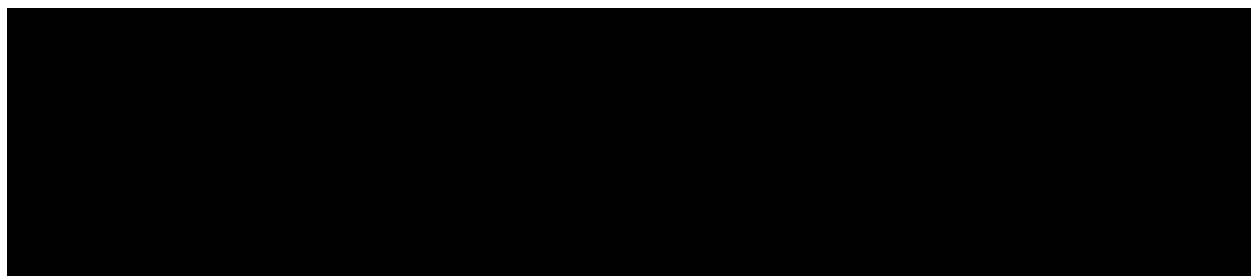
Response:

Please refer to Section 6.2.A summary.

- an overview of the integration between the Applicant's Platform and the Operator's wagering system;



- an outline of the features offered or used by the Operator that the Applicant believes sets it apart from other potential Applicants;



VIEW ENTRY

FOX BET
SUPER 6

FOX BET
SPORTSBOOK

PLAY SUPER 6 AND WIN FREE BETS ON FOX BET! EVEN ANSWERING ONE CORRECTLY MAKES YOU A WINNER!

FREE BET PAYOUT

6 of 6	\$50
5 of 6	\$10
4 of 6	\$5
3 of 6	\$3
2 of 6	\$2
1 of 6	\$1

PLAY GAME

21+ T&C'S APPLY. CO, NJ, AND PA ONLY. GAMBLING PROBLEM? CALL 1-800-GAMBLER (NJ/PA) OR 1-800-522-4700 (CO)

FOX BET FIRST BET ON US RISK FREE!
BET

21+ and present in NJ, PA, CO or MI. Terms apply.
Gambling Problem? Call 1-800-GAMBLER (NJ/PA), 1-800-522-4700 (CO) or 1-800-270-7171 (MI)

MLB

- a sample wagering menu the Operator intends to offer if such wagers are approved by the Commission;

Please refer to Exhibit 6.2 B for Sports Markets and Wager Types.

- an illustration of the proposed Operator's ability to rapidly effectuate the commencement of mobile sports wagering on the Applicant's Platform; and

FOX Bet is already integrated within the Platform in multiple states.

- additional information the Applicant believes relevant to demonstrate the Operator's expertise, including, without limitation, experience in the field of mobile sports wagering.

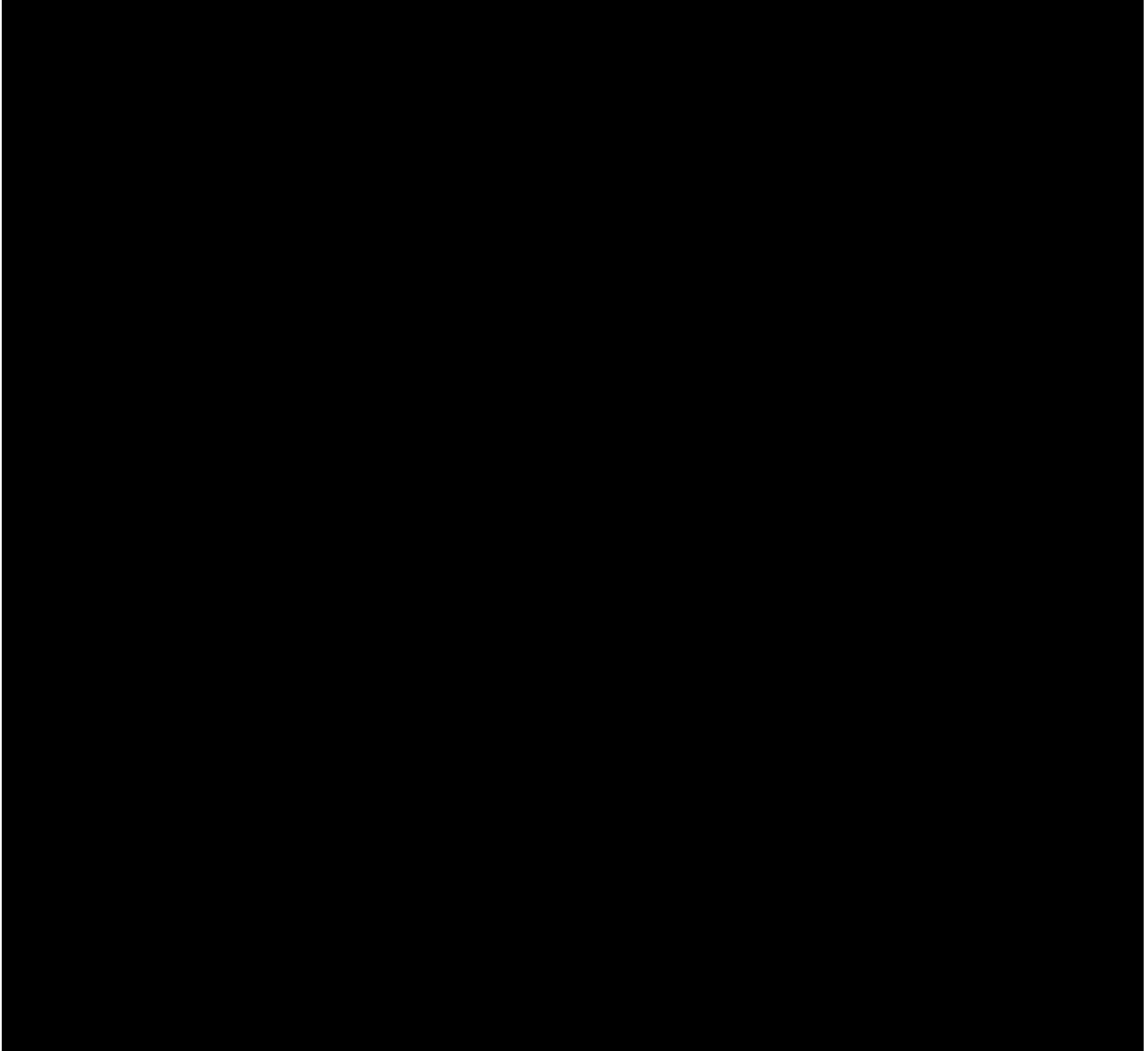


Exhibit 6.2(a)

New York State Gaming Commission
Request for Application
TSG Interactive US Services Limited d/b/a FOX Bet

6.2 EXPERTISE

Payments

[Redacted]

[Redacted]

[Redacted]

[Redacted]

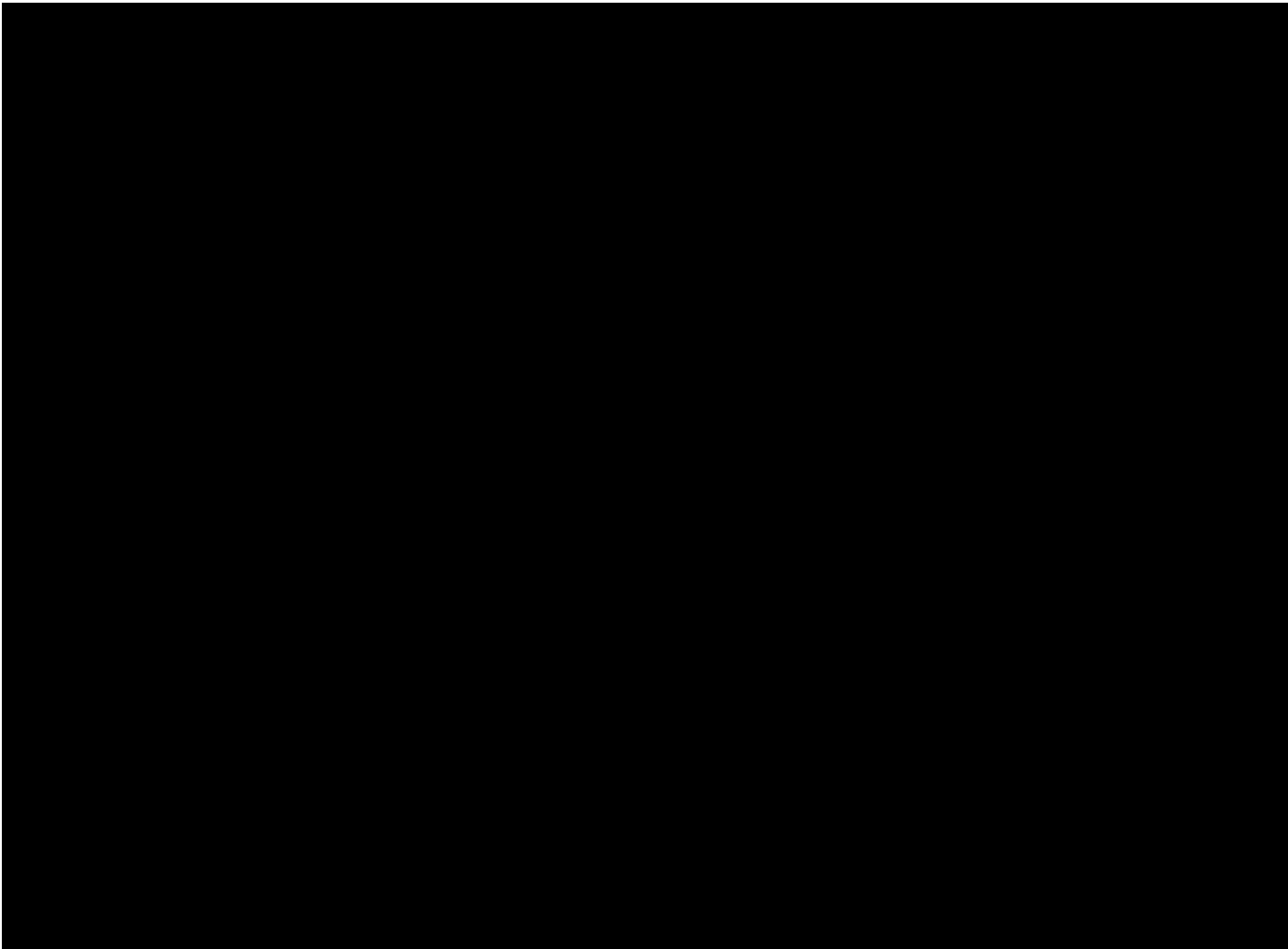
[Redacted]

[Redacted]

Security

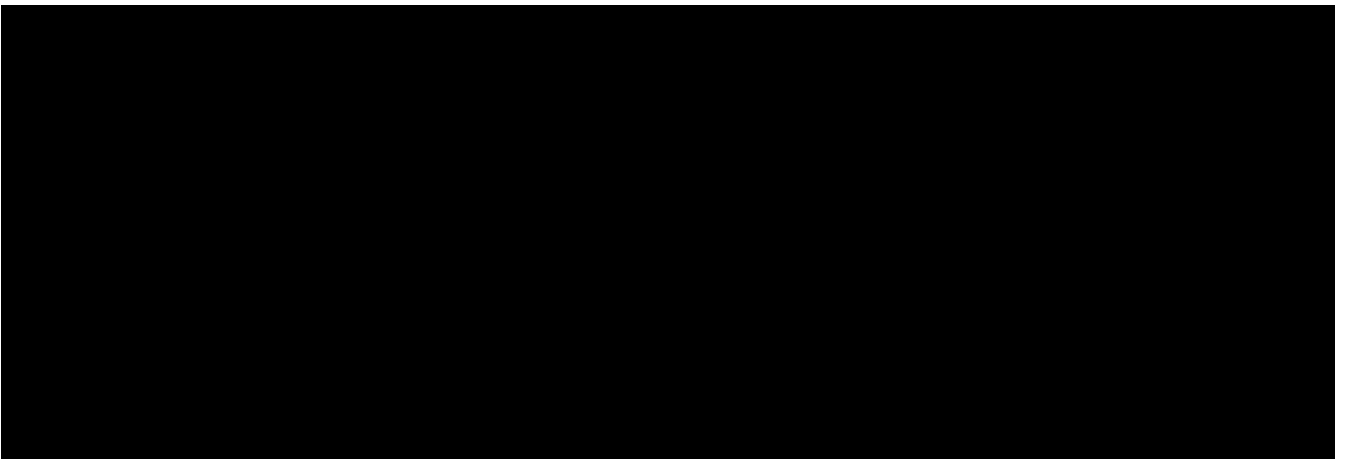
We have developed a variety of security, fraud and integrity related alert systems over the years which are based on rules engines covering numerous criteria and typologies and allow for ongoing refinement or dynamic and live modification to continually keep abreast of trends

or emerging patterns. Accordingly, such systems can accommodate specific regulatory requirements and be modified to suit particular needs. These systems are discussed below:



KYC

We will verify the customer's identity and record the methodology for remote authentication, which may include third-party and governmental databases.



[REDACTED]

AML

Our Legal Department maintains the company's Anti-Money Laundering (AML) program, which was developed in consultation with outside counsel and our audit and risk management functions.

[REDACTED]

[REDACTED]

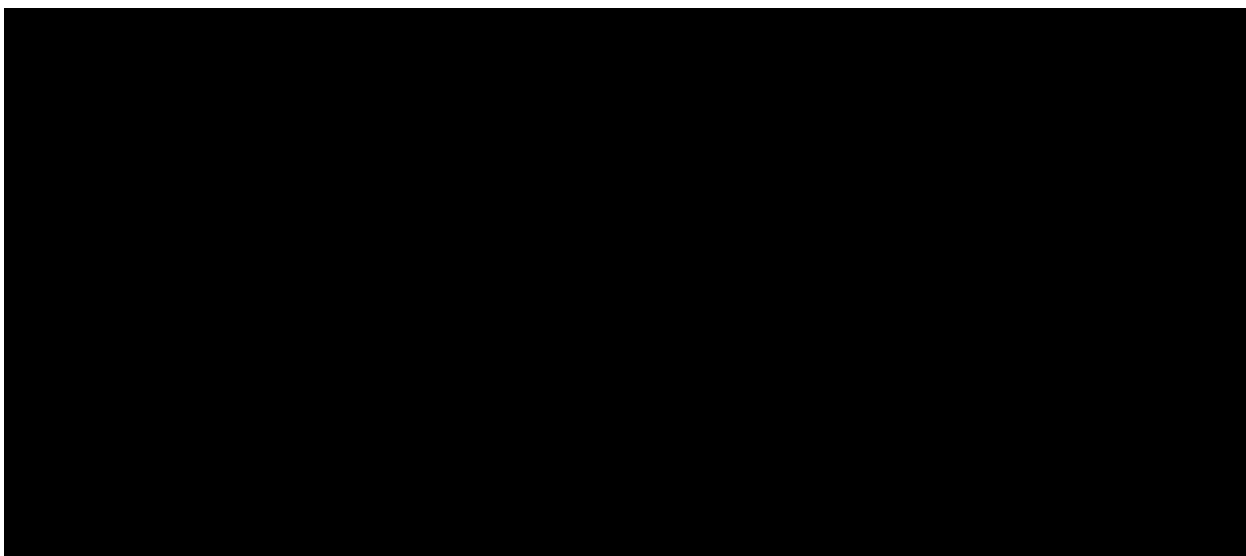
[REDACTED]

Relationship screening continues to be the most effective tool in online gambling, and therefore we have developed a sophisticated and thorough facility with related technology:

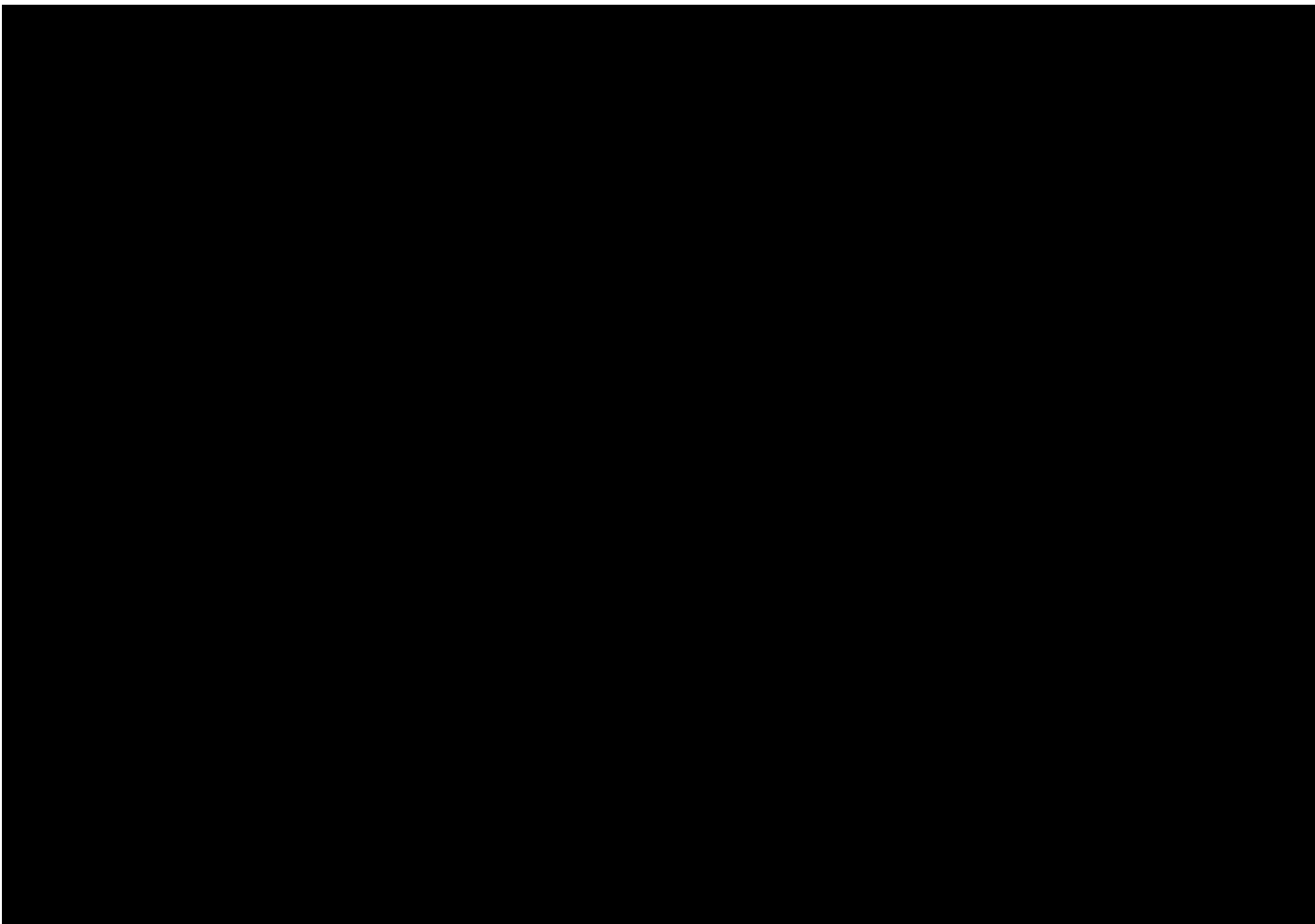
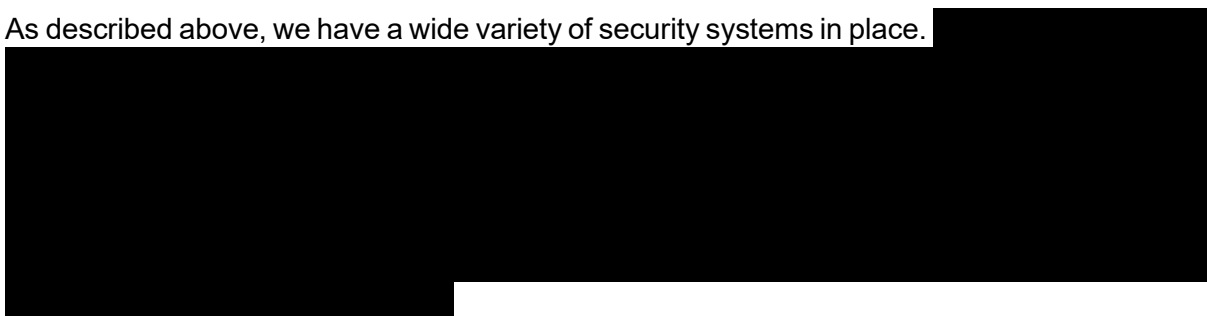
[REDACTED]

[REDACTED]

[REDACTED]



As described above, we have a wide variety of security systems in place.



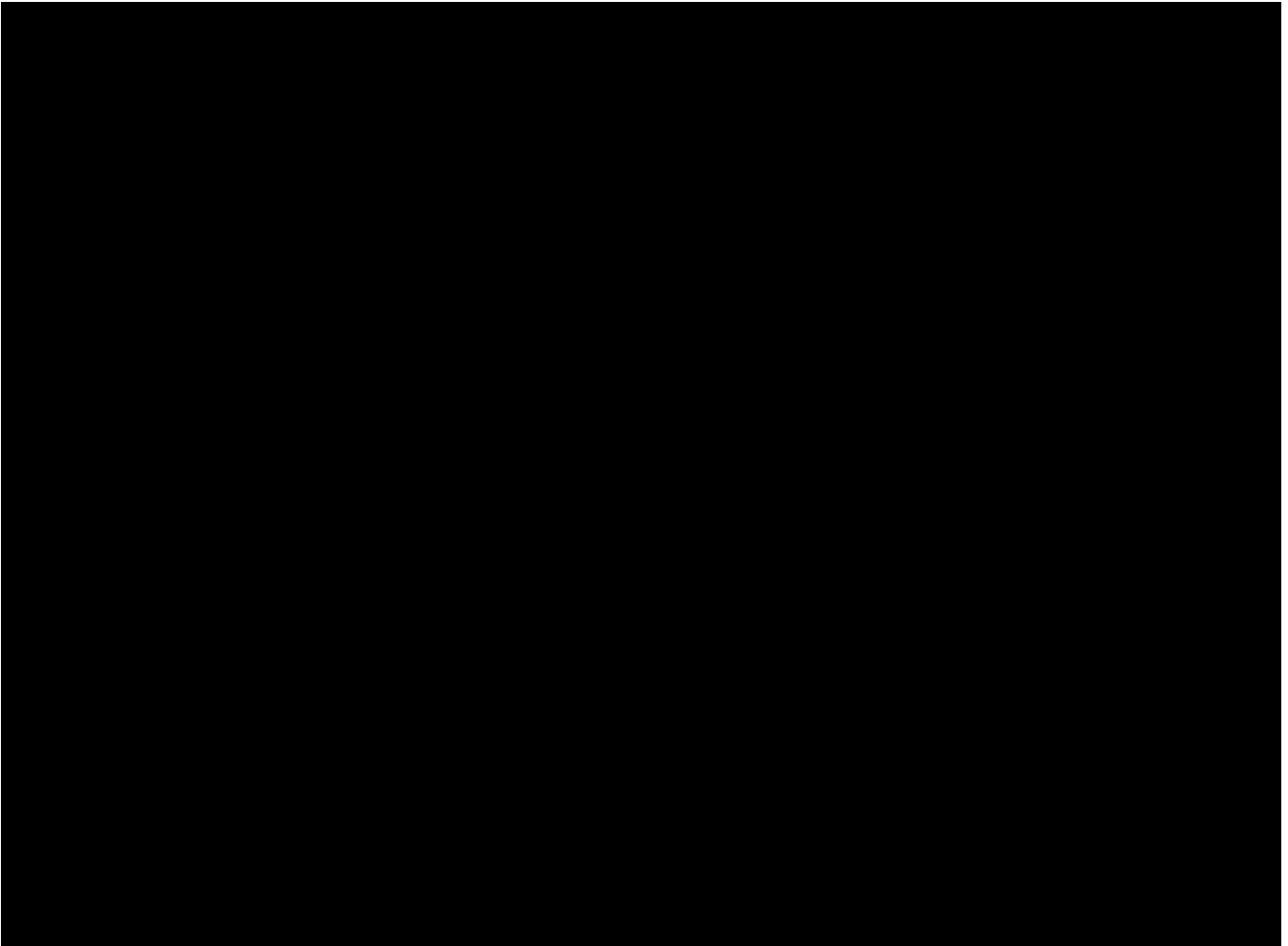


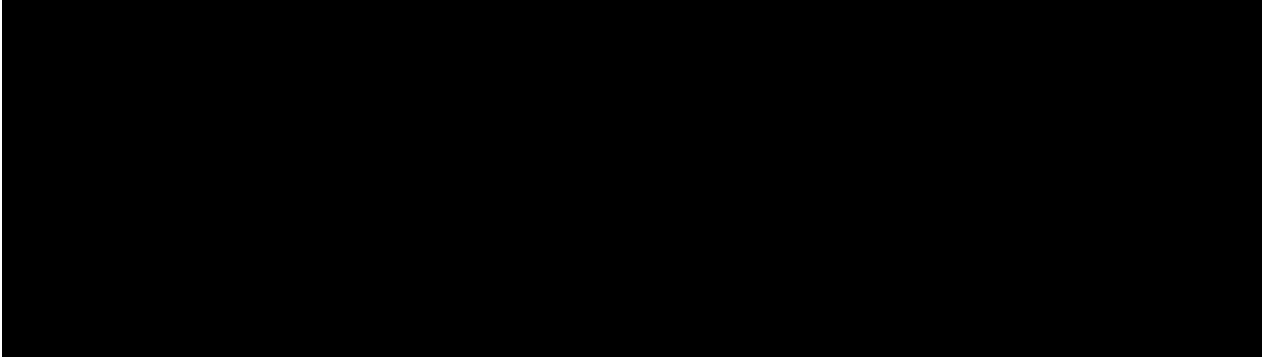
FinCEN

We are fully compliant with FinCEN Regulations, the PATRIOT Act, and the Bank Secrecy Act. On an annual basis, we perform an internal as well as an external audit to ensure that our processes and procedures are being conducted appropriately and to the highest standards.

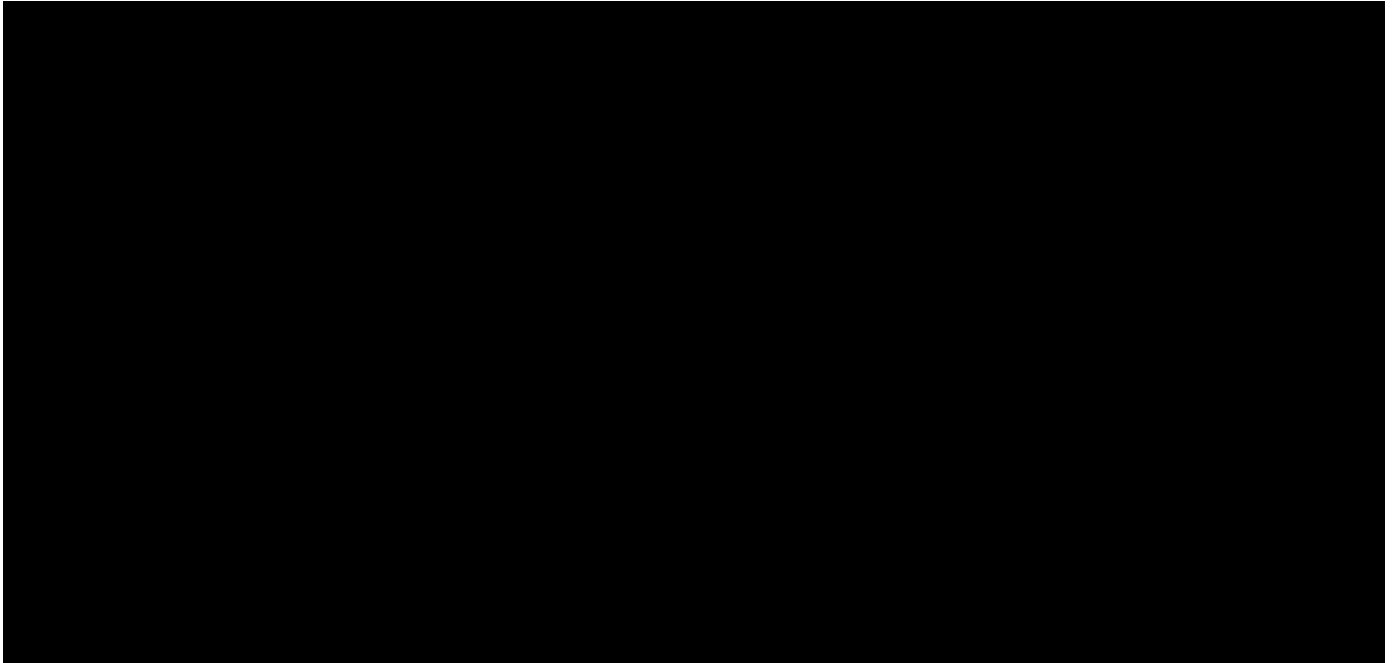
Geofencing

We contract with GeoComply, the gaming industry's leading provider, for geolocation services. A GeoComply check is initiated as part of a customer's login process. The customer will be unable to wager until a valid location has been established, and the customer will not be allowed to place a wager if GeoComply detects that the customer is not in an area authorized for the type of wagering that is being accessed. Customers will not be prohibited from logging into their accounts to make deposits, request withdrawals, change preferences, etc. when not in an authorized area.



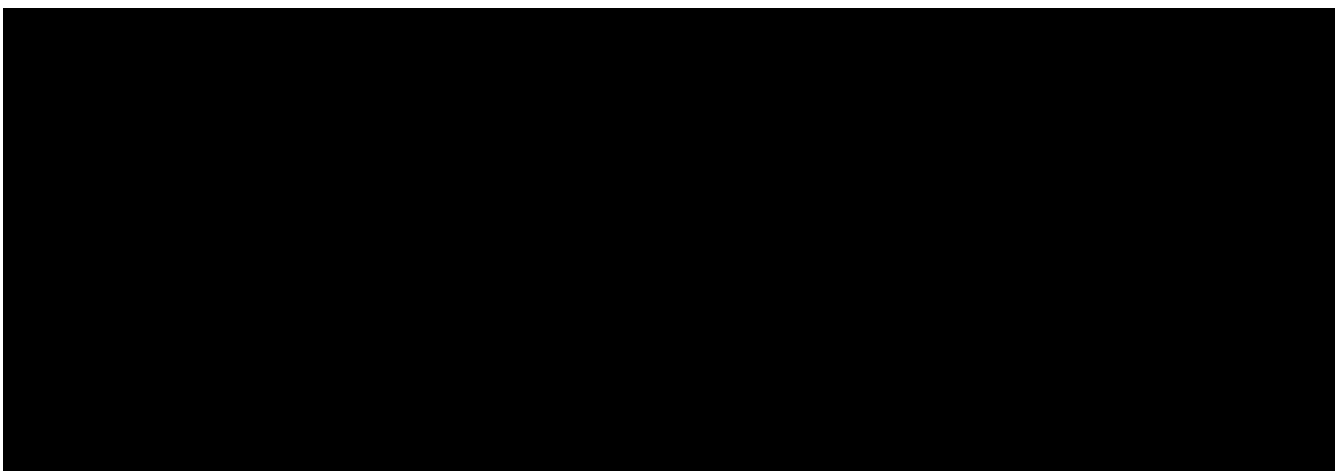


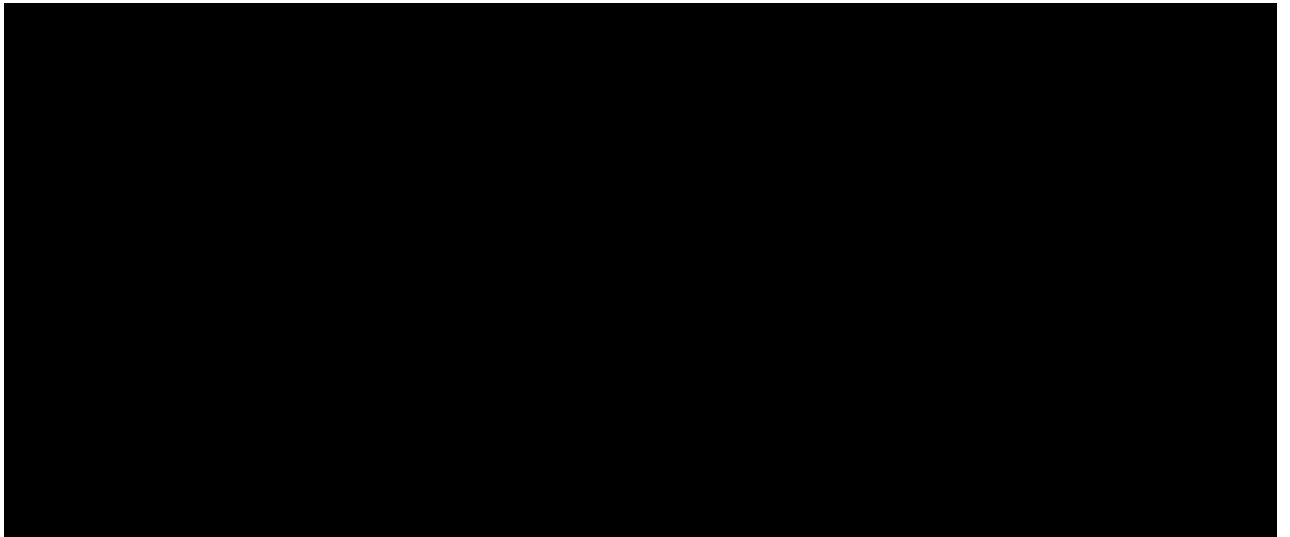
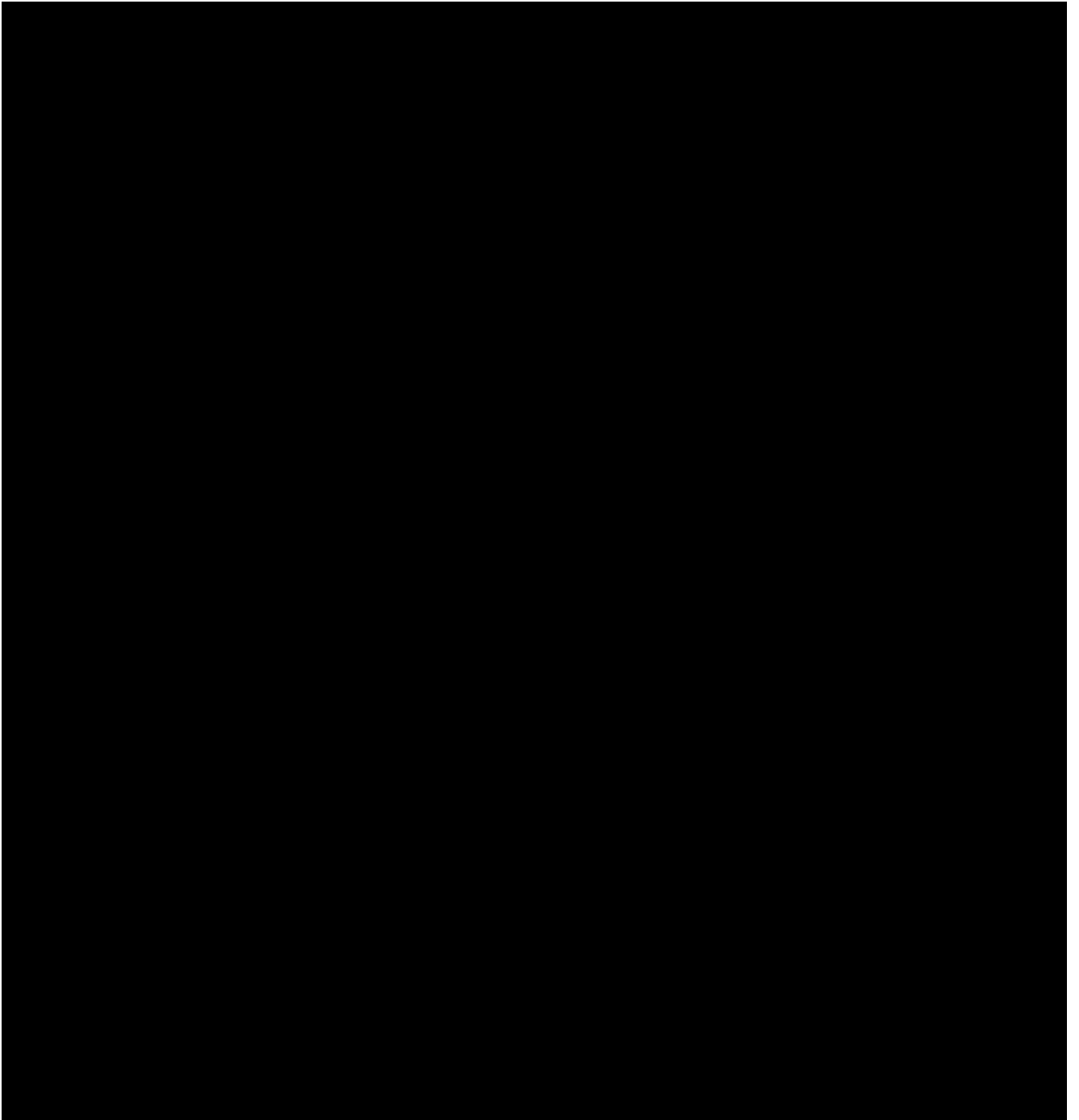
Responsible Gaming

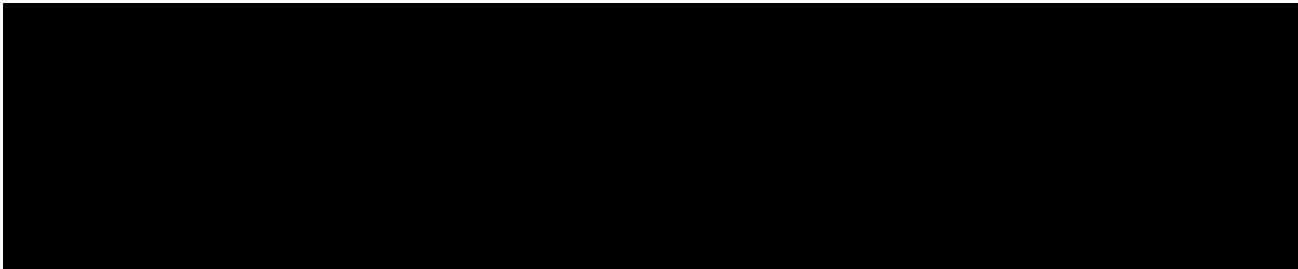
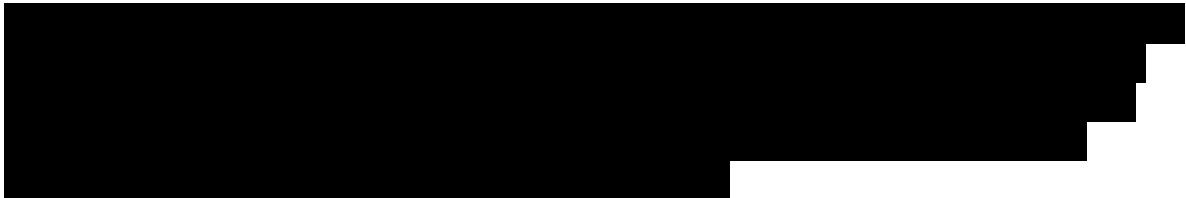
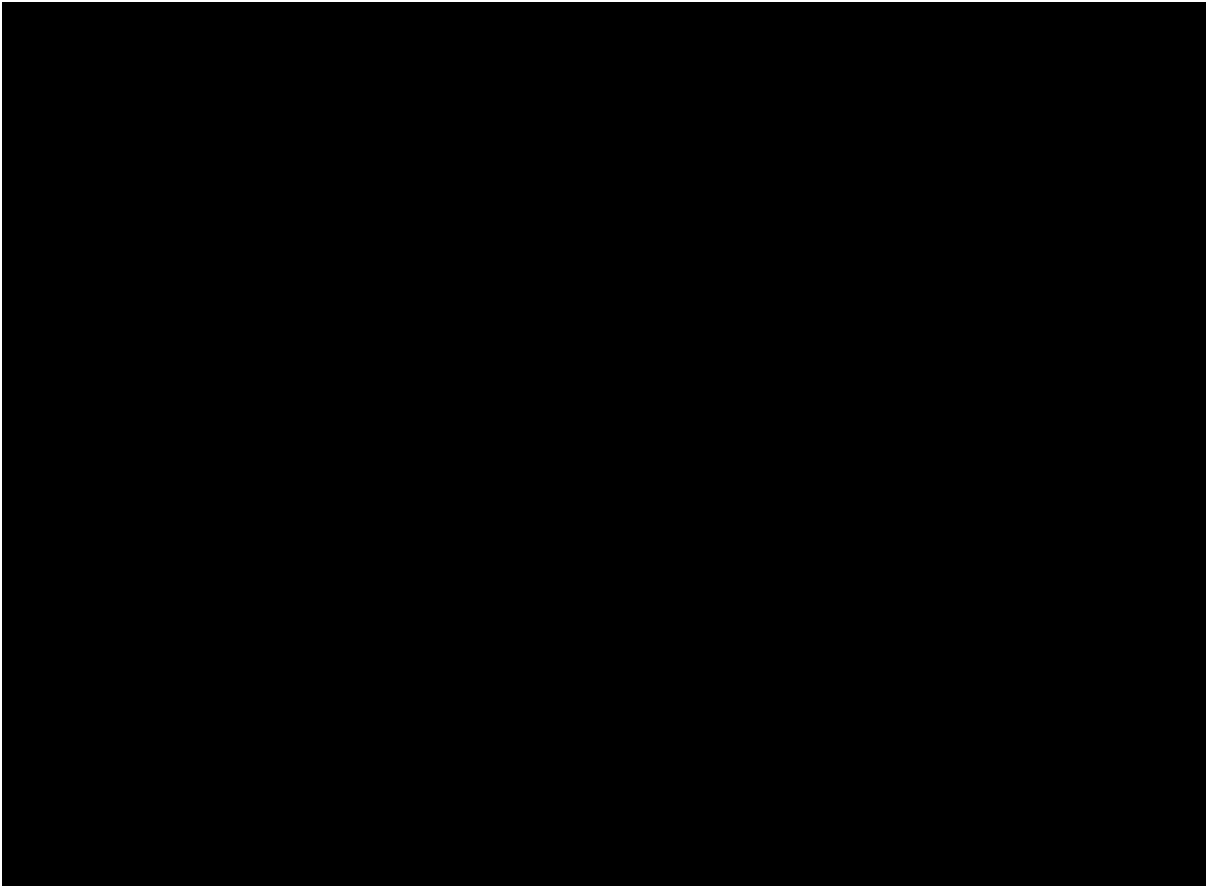


As gaming becomes more popular in the United States, it is more important than ever that we continue to engage with customers and other industry stakeholders, including regulators, to own the social responsibility that comes with it to protect at-risk customers. We are always looking for new, innovative ways to improve the resources and tools that help keep our customers safe and we are committed to investing in our people, resources, outreach, and technology in support of enhancing a safe, sustainable environment for our customers to enjoy.

We offer the following self-imposed limits and player protections:





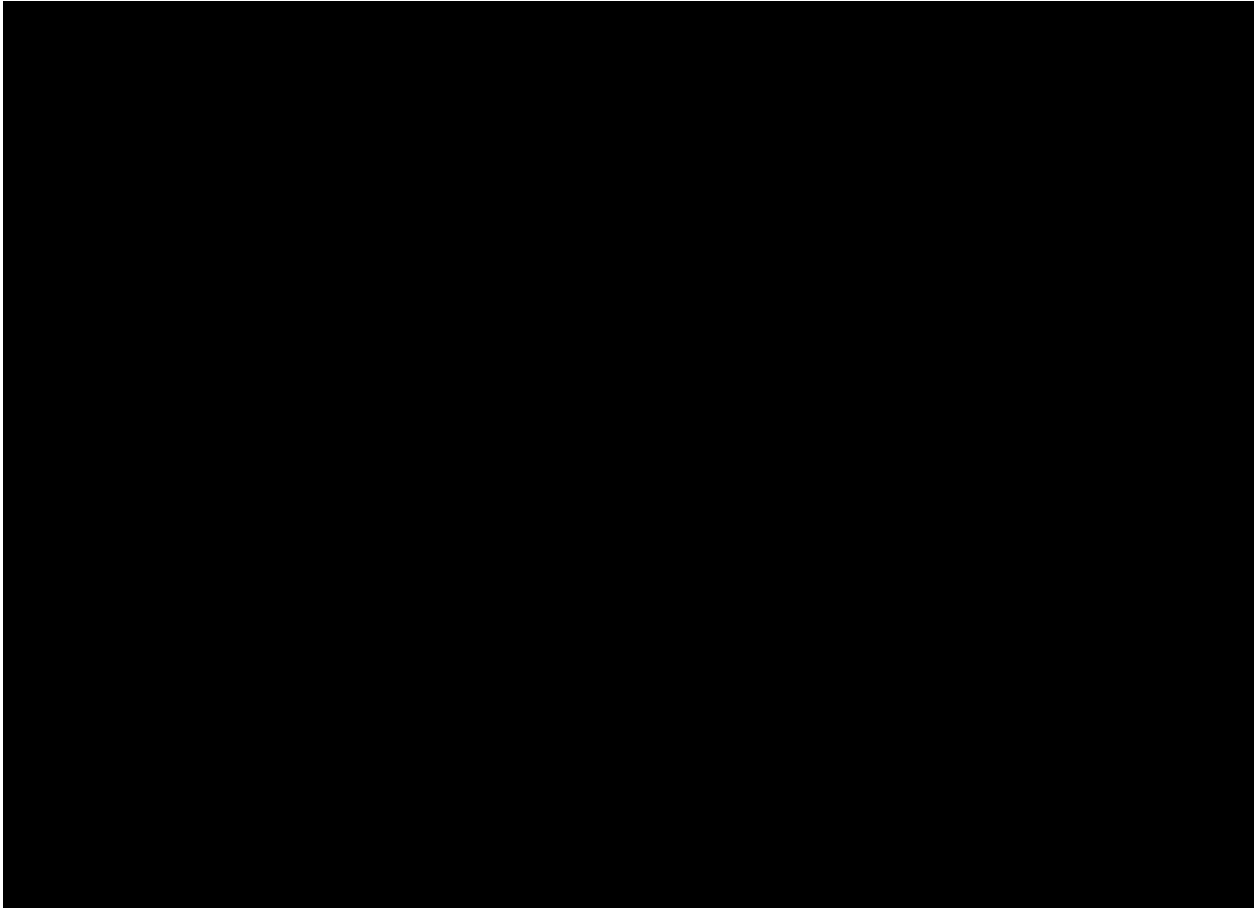


Any player wishing to set a self-imposed limit should visit the Responsible Gaming page. A link to this page is available from every page in the app/website.



We will provide a mechanism by which a registered player may change the controls of his self-imposed limit.

The following will apply to all self-imposed limits:



Our website and mobile application contain a player protection page which provides player responsibilities regarding responsible gaming.

1. Nine areas of responsible gaming include:
 - a. Gambling for entertainment purposes.
 - b. Treating the money lost as the cost of entertainment.
 - c. Setting a dollar limit and sticking to it.
 - d. Setting a time limit and sticking to it.
 - e. Expecting to lose.
 - f. Creating balance in your life.
 - g. Avoiding "chasing" lost money.
 - h. Not gambling as a way to cope with emotional or physical pain.
 - i. Becoming educated about the warning signs of problem gambling.
2. All brochures, links and related material will be provided on our responsible gaming webpage.
3. All registered players have the right to set limits and to self-suspensions.
4. All registered players have the right to self-exclude from sportsbook activities.

[REDACTED]

[REDACTED]

[REDACTED]

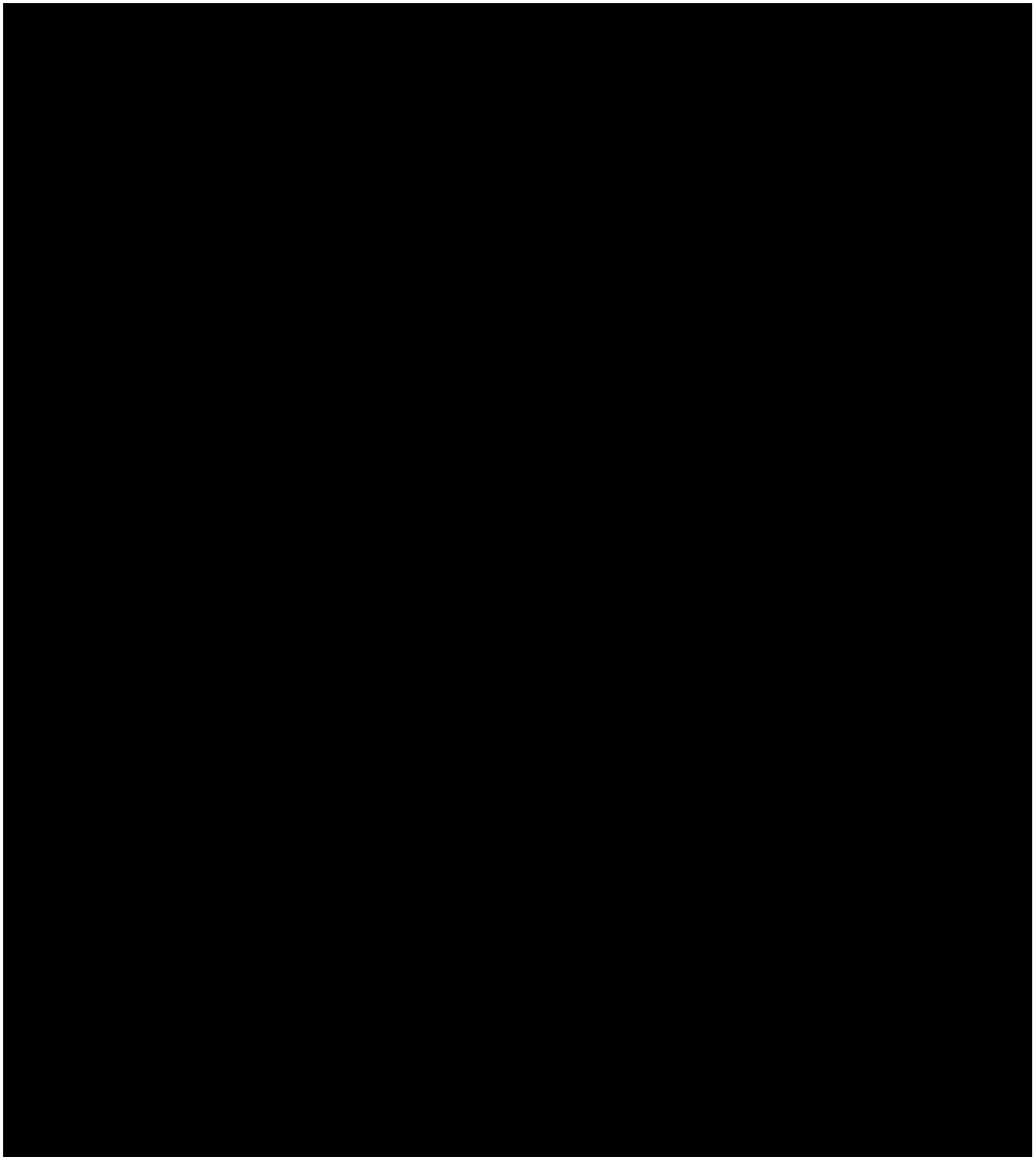
Reporting

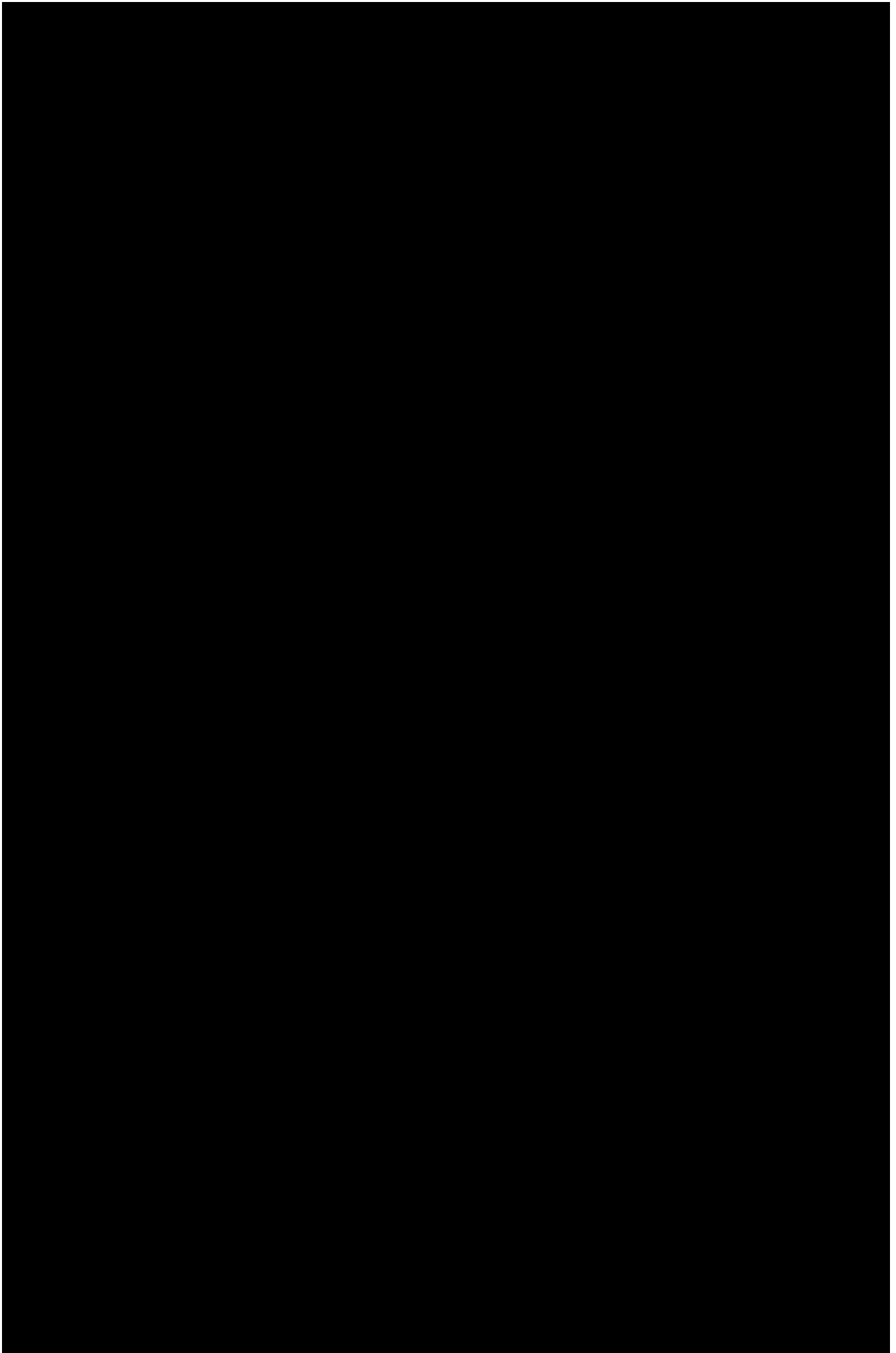
The platform tracks thousands of points of data with respect to all aspects of operations. We have comprehensive and flexible reporting capabilities. We have a wide array of existing reports and our developers have extensive experience in customizing reports to meet specific criteria set down by the many external regulators who have granted us licenses to operate.

[REDACTED]

Market Creation and Trading

[REDACTED]





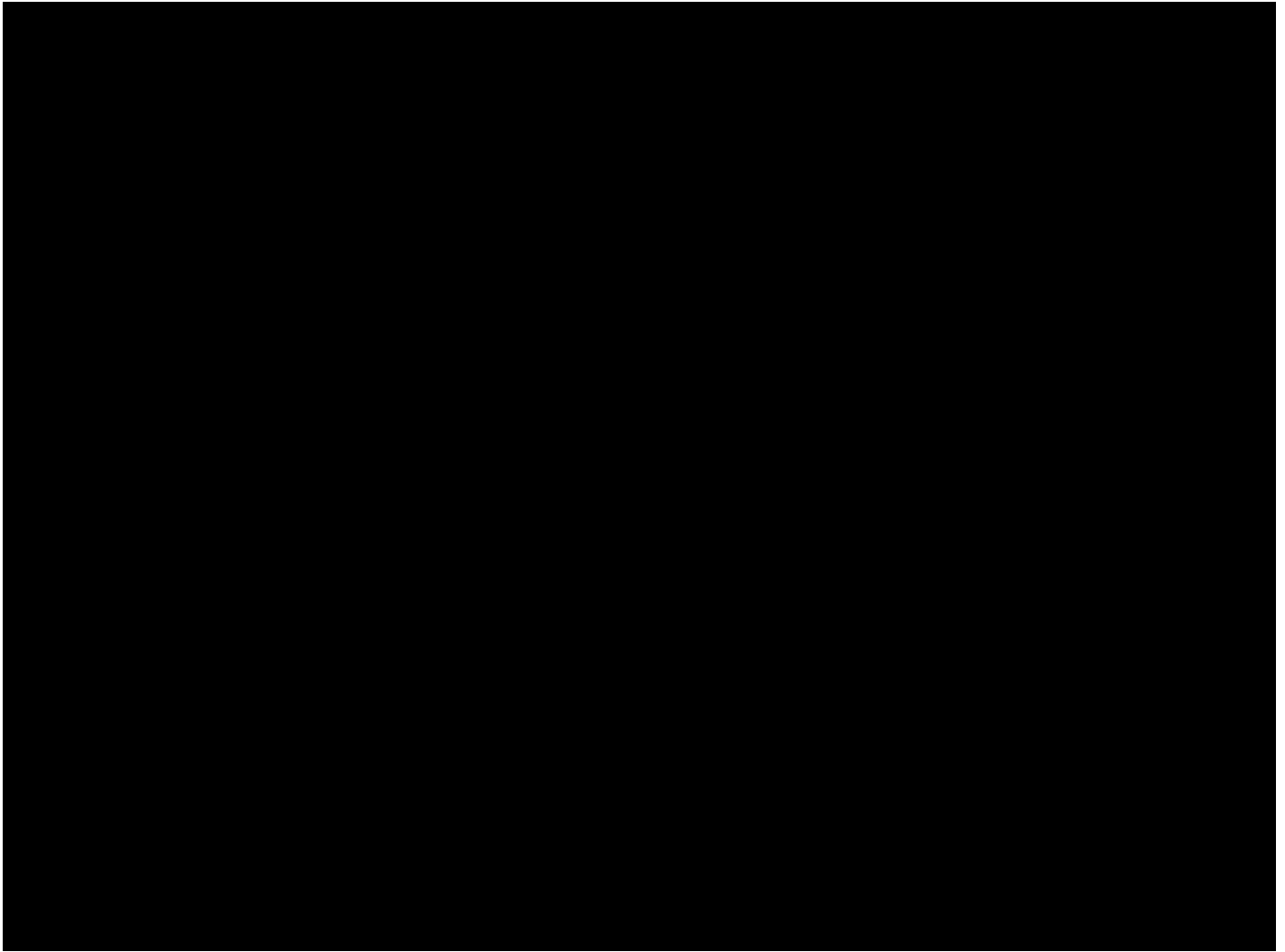


Exhibit 6.2(b)









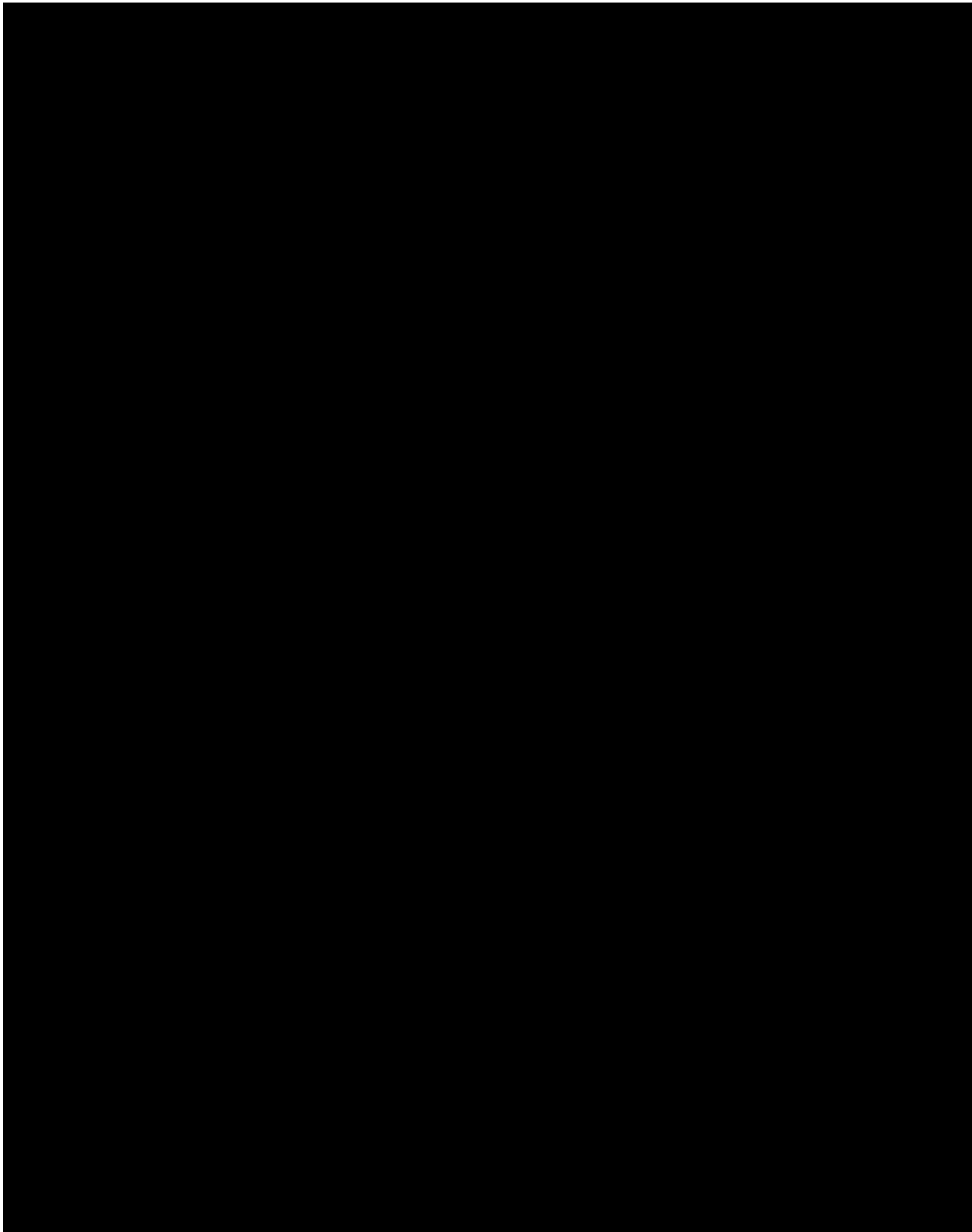










































































































































































































































































6.3 INTEGRITY, SUSTAINABILITY AND SAFETY

The Applicant shall provide detailed information on how the Applicant or the Applicant's proposed Operators will ensure the responsibilities, duties and requirements in draft regulations Part 5330 in regard to:

Response:

A. wager acceptance;

The FOX Bet proprietary sportsbook platform is

[REDACTED]

The FOX Bet Sportsbook is

B. verification of information provided by Authorized Sports Bettors opening a new account;

We will verify the customer's identity

[REDACTED]

[REDACTED]

Customers who are unable to establish credentials for gaming will not be allowed to wager on the platform.

[REDACTED]

C. the systems used for monitoring structured wagers and unusual or suspicious wagering activity;

1. Customer Monitoring

Customers are monitored [REDACTED] on a 24/7 basis. [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

2. Wager Monitoring

As referenced above, the key aspect of risk management is real-time monitoring [REDACTED]
[REDACTED] for 24/7 coverage. [REDACTED]
[REDACTED]

[REDACTED]

3. Fraud and Integrity Monitoring

[REDACTED] required to monitor all wagers to identify any potential issues relating to irregular betting activity, responsible gaming or suspicious wagering. All of those concerns should be escalated [REDACTED]

4. Alerting Process

We are required to inform the integrity monitoring association, state or jurisdictional regulatory authorities and relevant sports governing bodies of any instances of unusual or suspicious betting activity and any follow up actions that are taken according to the integrity monitoring systems in place. The below process describes how these requirements are fulfilled.

[REDACTED]

[REDACTED]

D. [REDACTED] the systems used to ensure that Authorized Sports Bettors are physically located within the State of New York while placing a wager; (Geolocation Description)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

E. the technology to ensure that any wager is accepted through equipment physically located at a licensed gaming facility in the State; (Geolocation Description, routing of traffic based on Geolocation Information).

[REDACTED]

[REDACTED]

F. description and location of redundant servers, if any;

[REDACTED]

[REDACTED]

G. security of servers, applications, and communication networks;
and patron personal and wagering information;

We seek to ensure that confidentiality, integrity and availability of its information is maintained by implementing best practice to minimize the risks that exist in the environments in which we operate. The data that is stored in manual and electronic systems represent an extremely valuable asset.

[REDACTED]

We protect our infrastructure from the threat of DDOS attack [REDACTED]

[REDACTED]

[REDACTED]

Some aspects of information security are also governed by legislation in the various jurisdictions in which we operate. For this reason, we have implemented strong Information Security policies

[REDACTED]

[REDACTED]

[REDACTED]

As an organization, we carry out extensive due diligence checks prior to engaging with any third party provider [REDACTED]

[REDACTED]

We have implemented acceptable use policies for all IT systems. [REDACTED]

[REDACTED]

We work with various partner organizations that play a role in delivering business services. When information is exchanged with those organizations, care must be taken to ensure that adequate measures to protect data are used. In order to ensure that any such exchanges meet the required standards, [REDACTED]

[REDACTED]

H. integrity monitoring and reporting, including any current affiliations related to integrity monitoring; and

Please see the Suspicious Betting Procedure attached as [Exhibit 6.3 H](#).

I. responsible gaming.

Please see the Responsible Gaming Plan attached as Exhibit 6.3 I.

Exhibit 6.3(h)

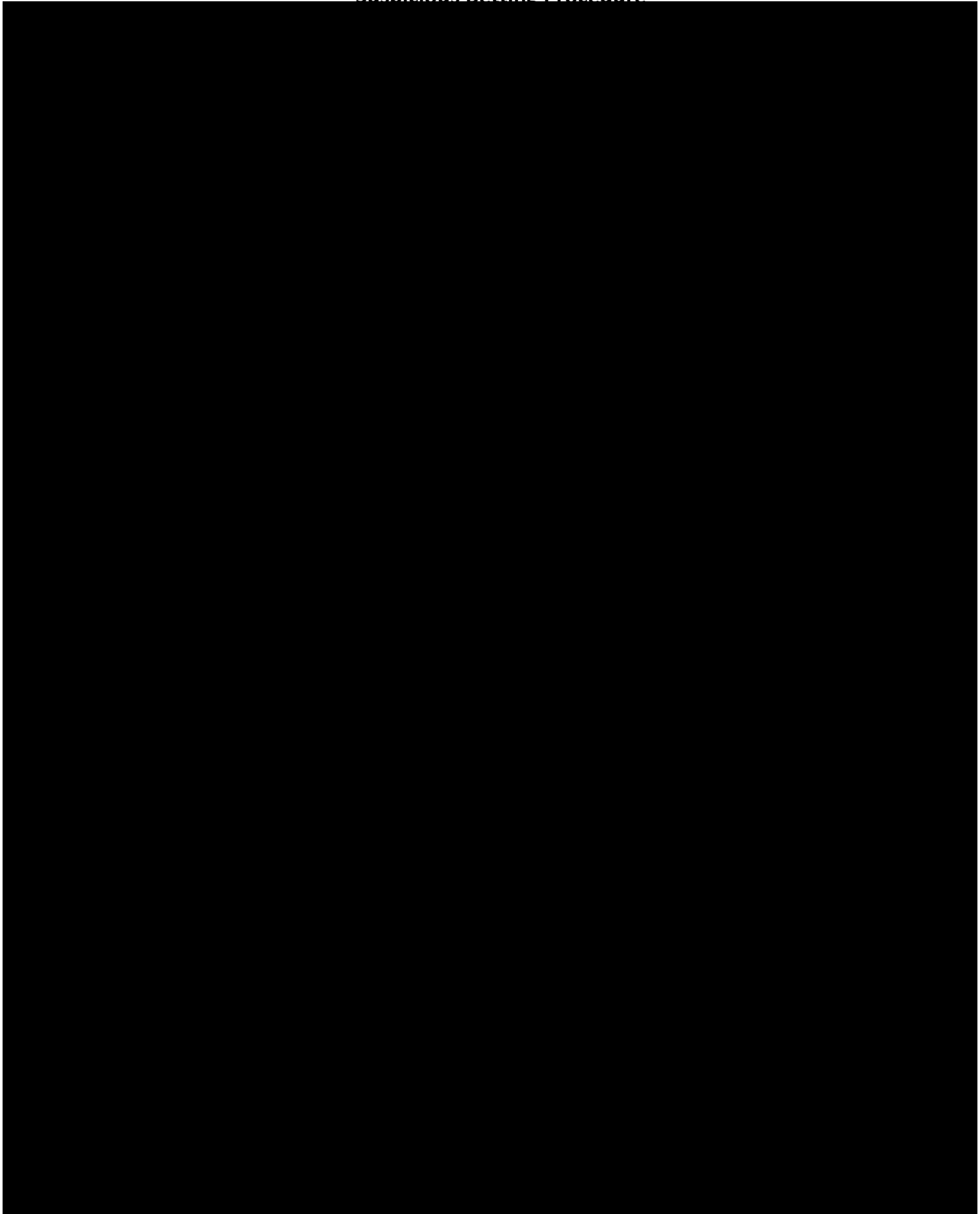


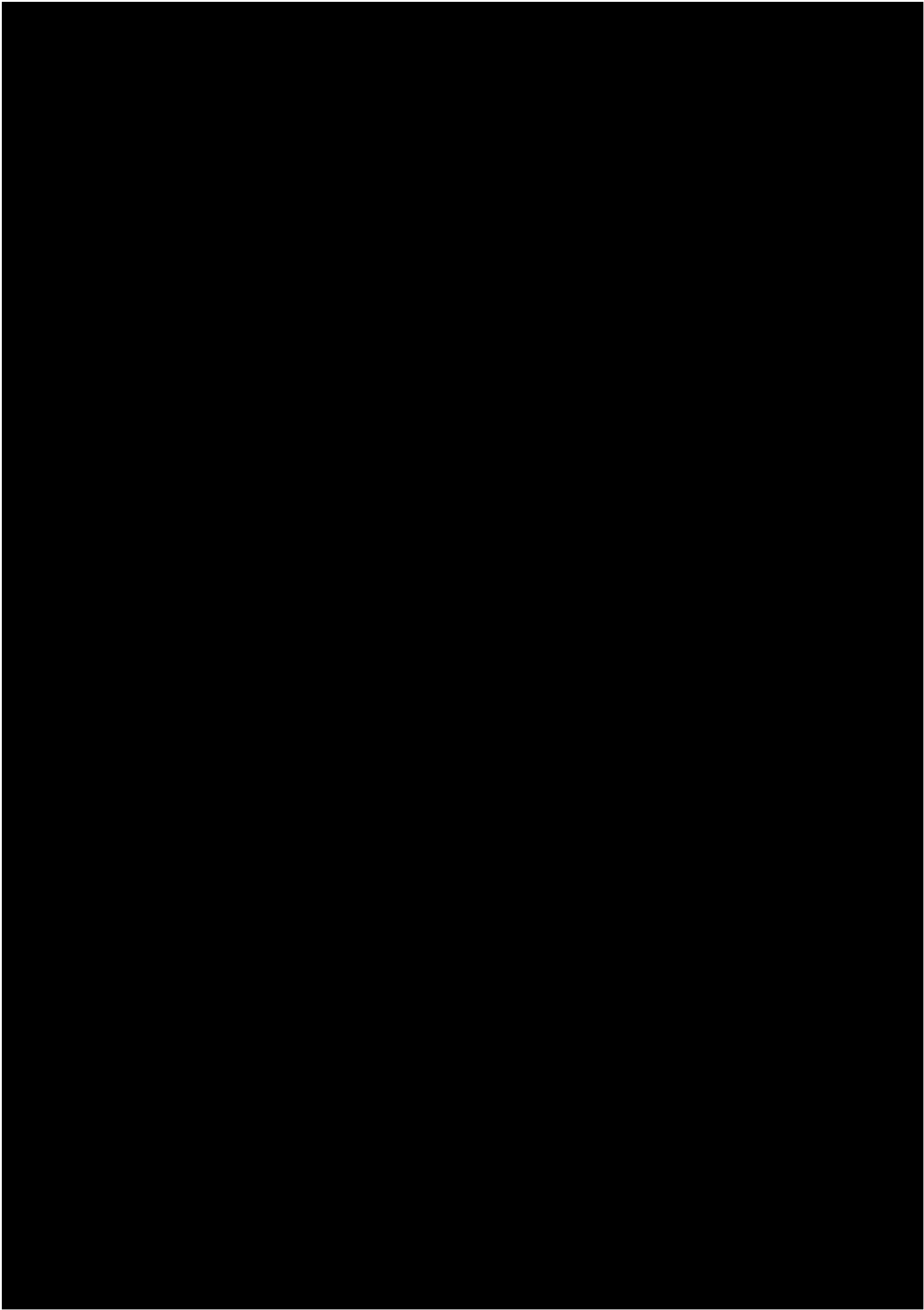
CONFIDENTIAL INFORMATION

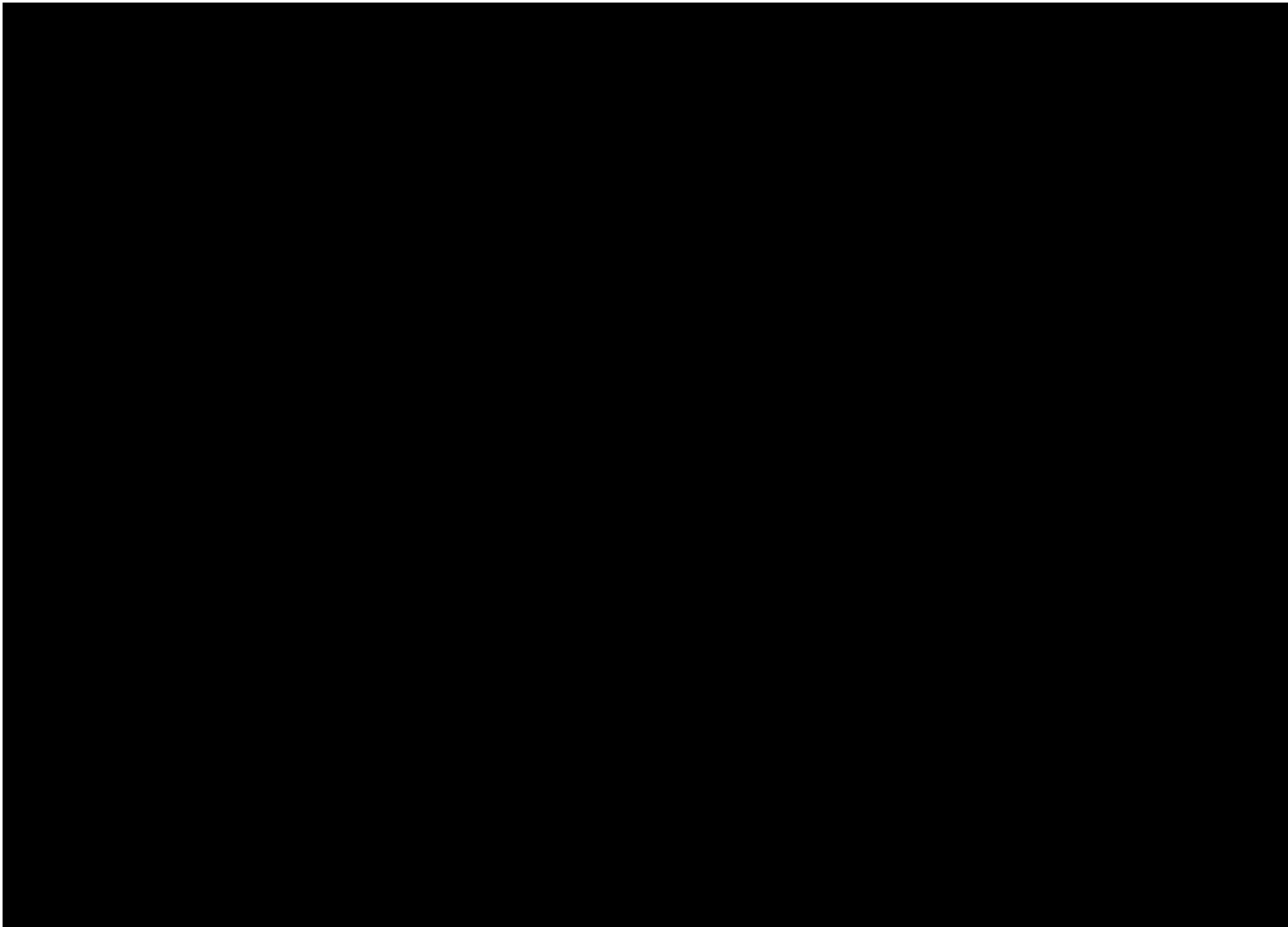
TSG Interactive US Services Limited
Internal Controls
Suspicious Betting Activity

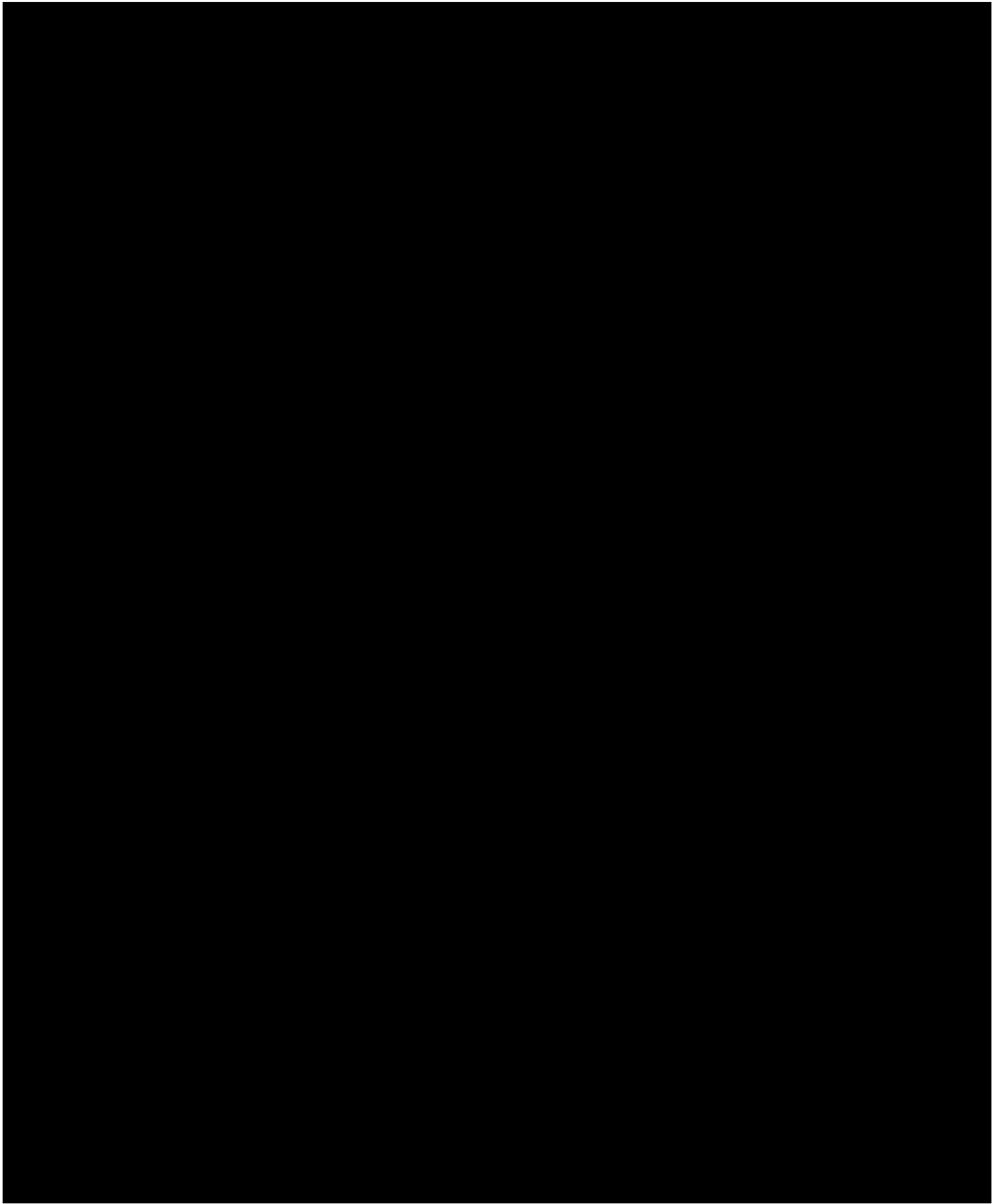


Suspicious Betting Procedure









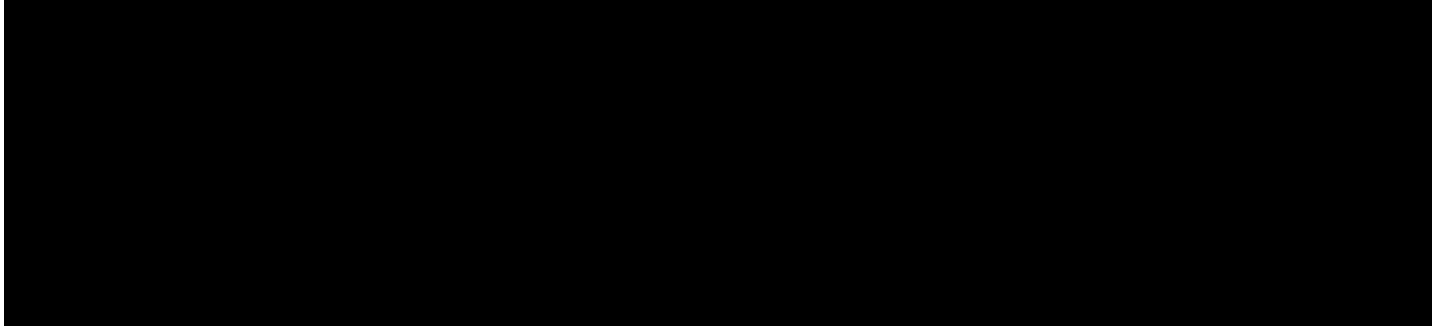


Exhibit 6.3(i)



































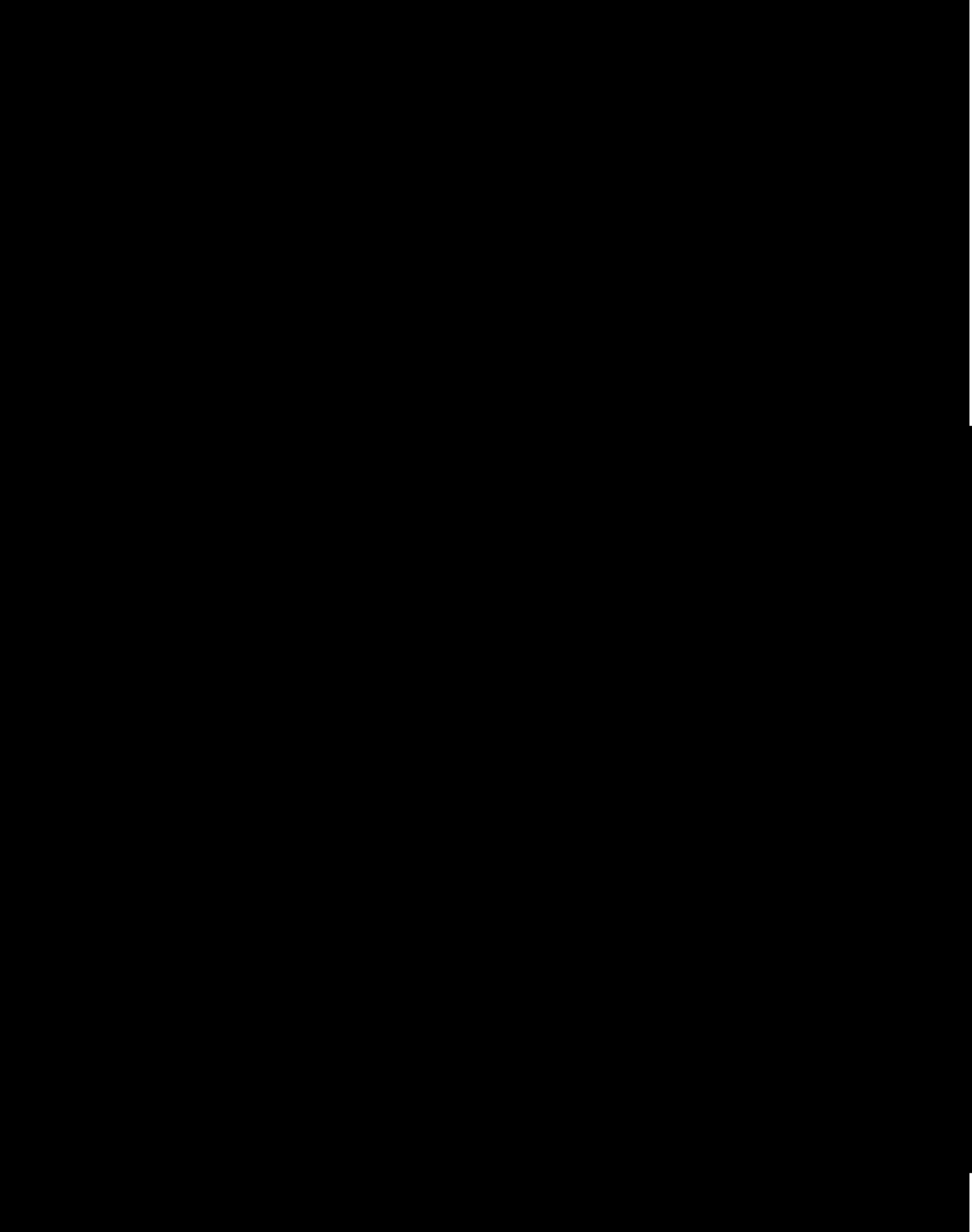


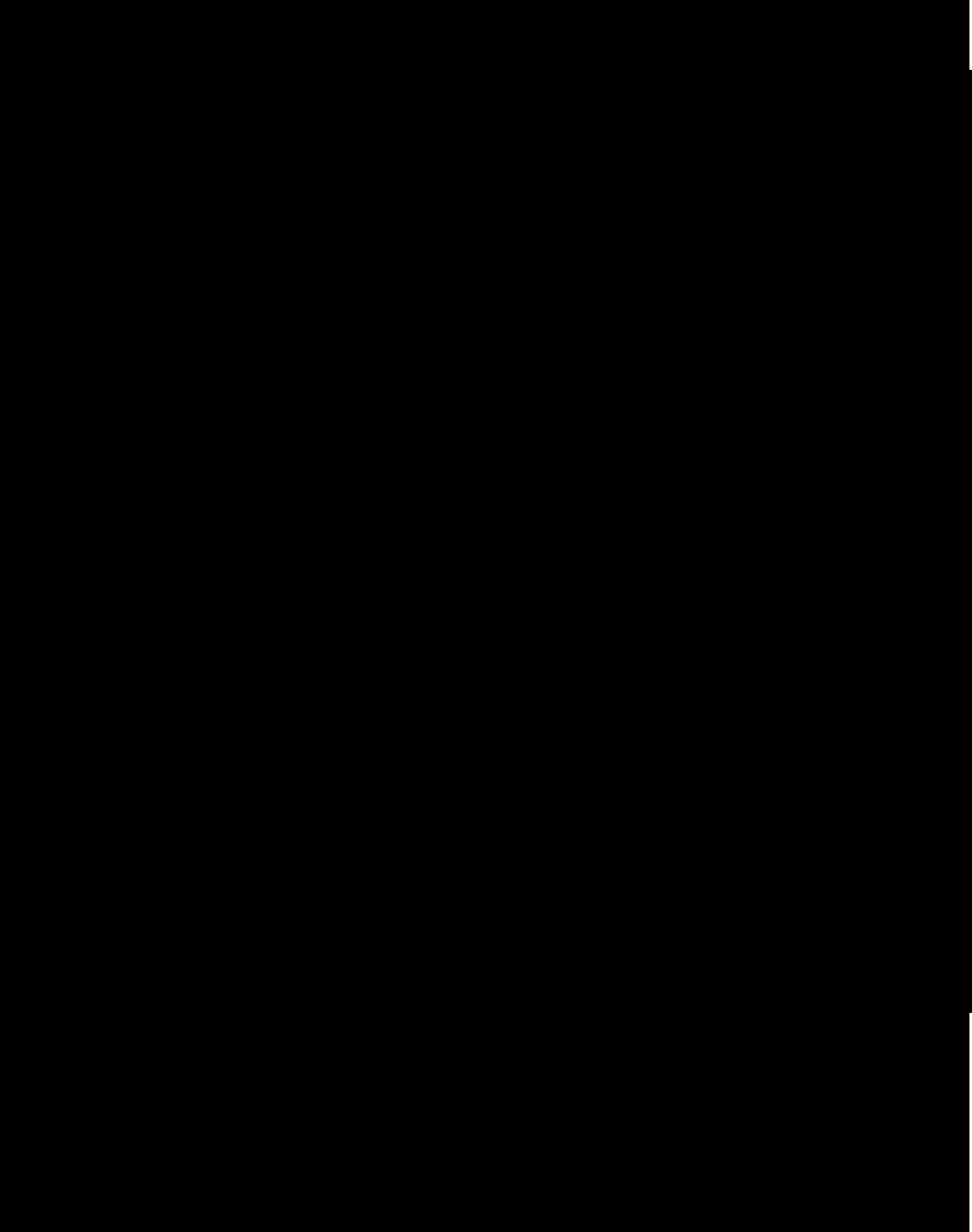






































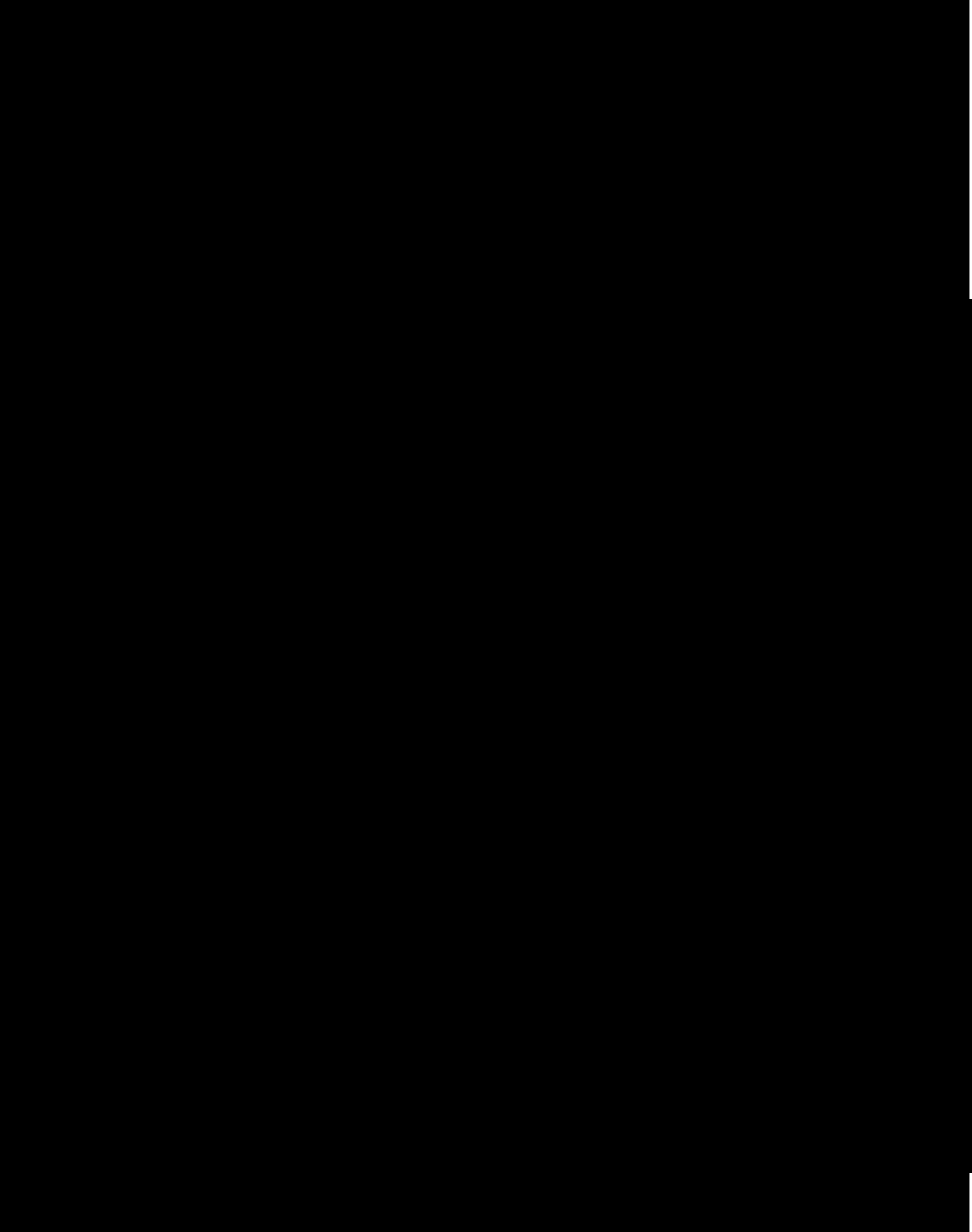




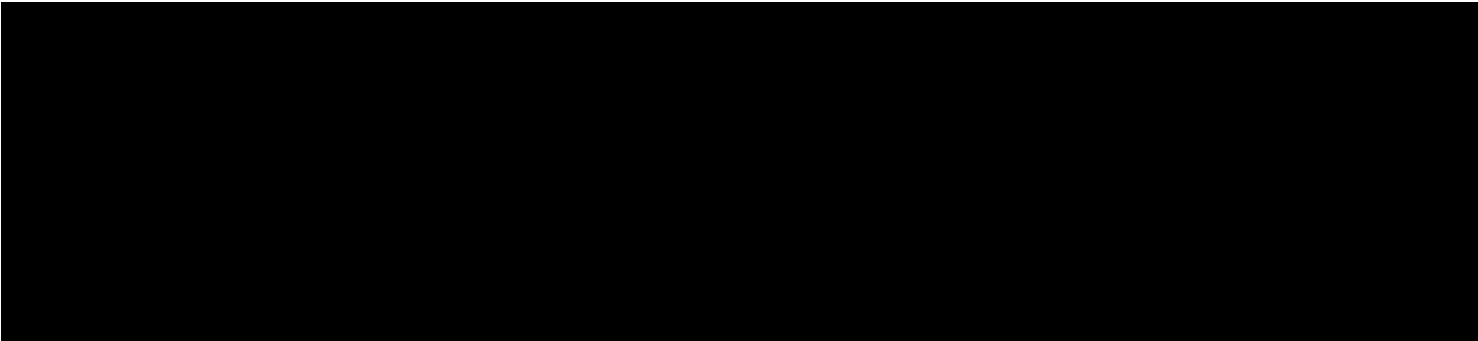




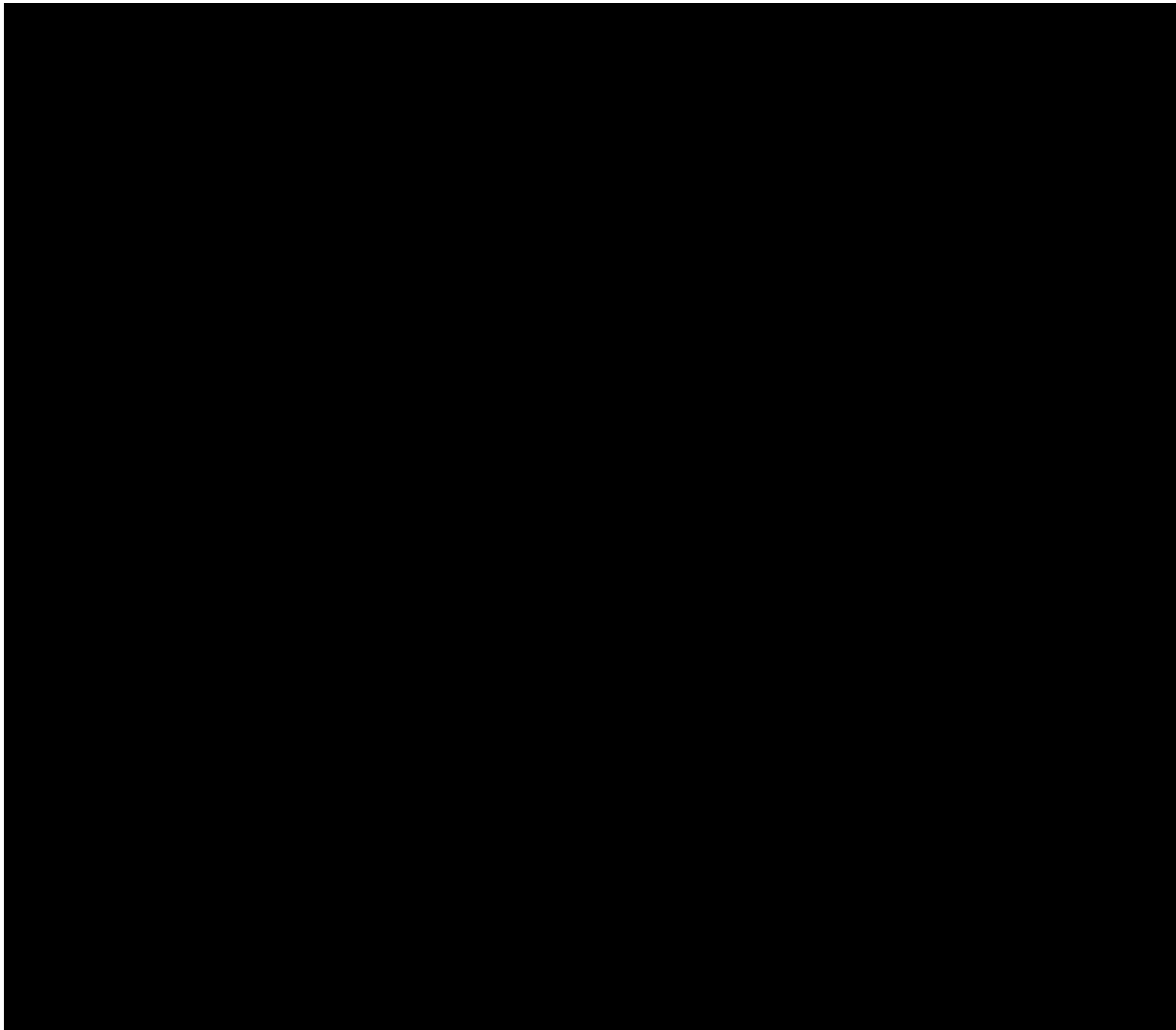




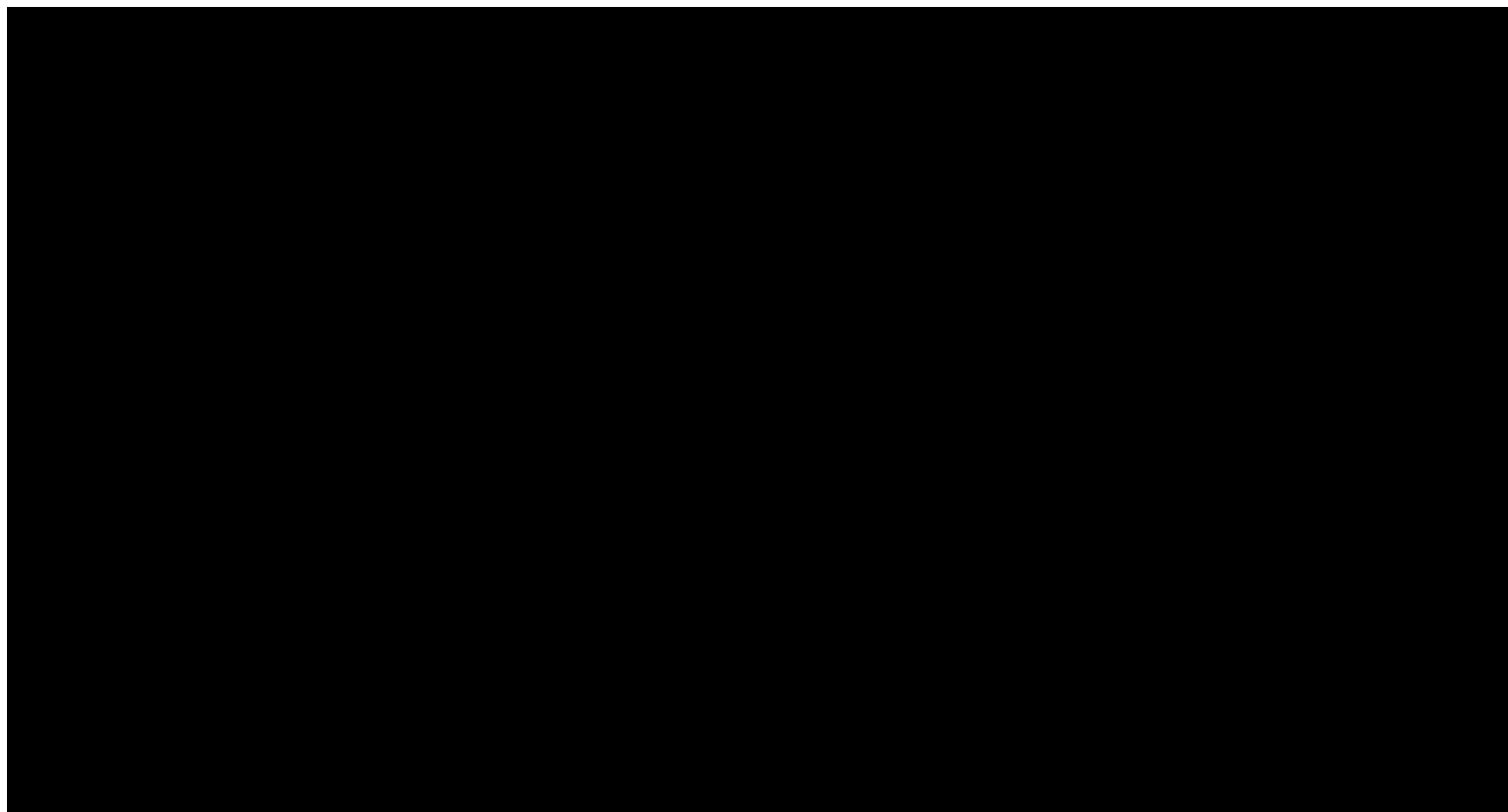
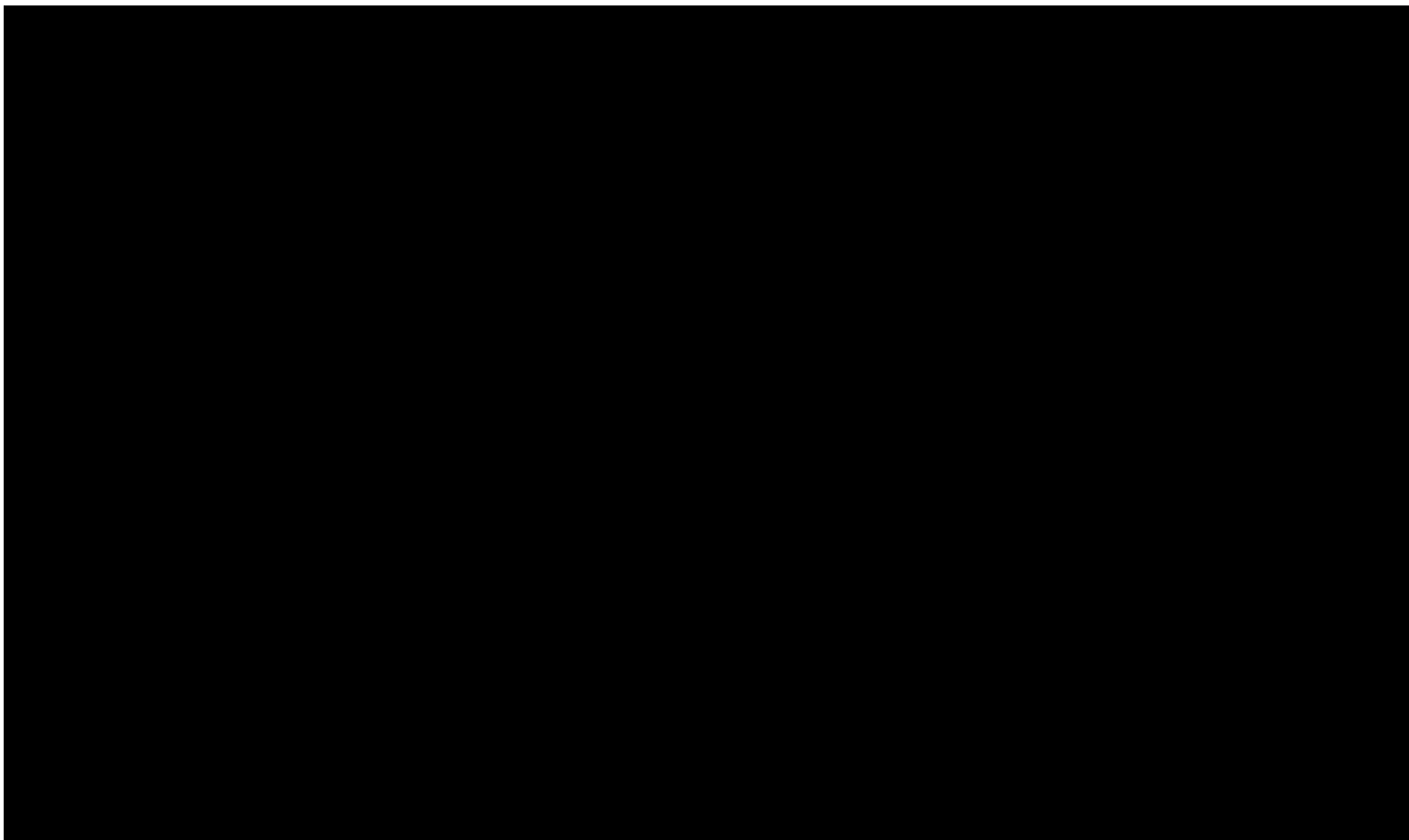
Private & Confidential



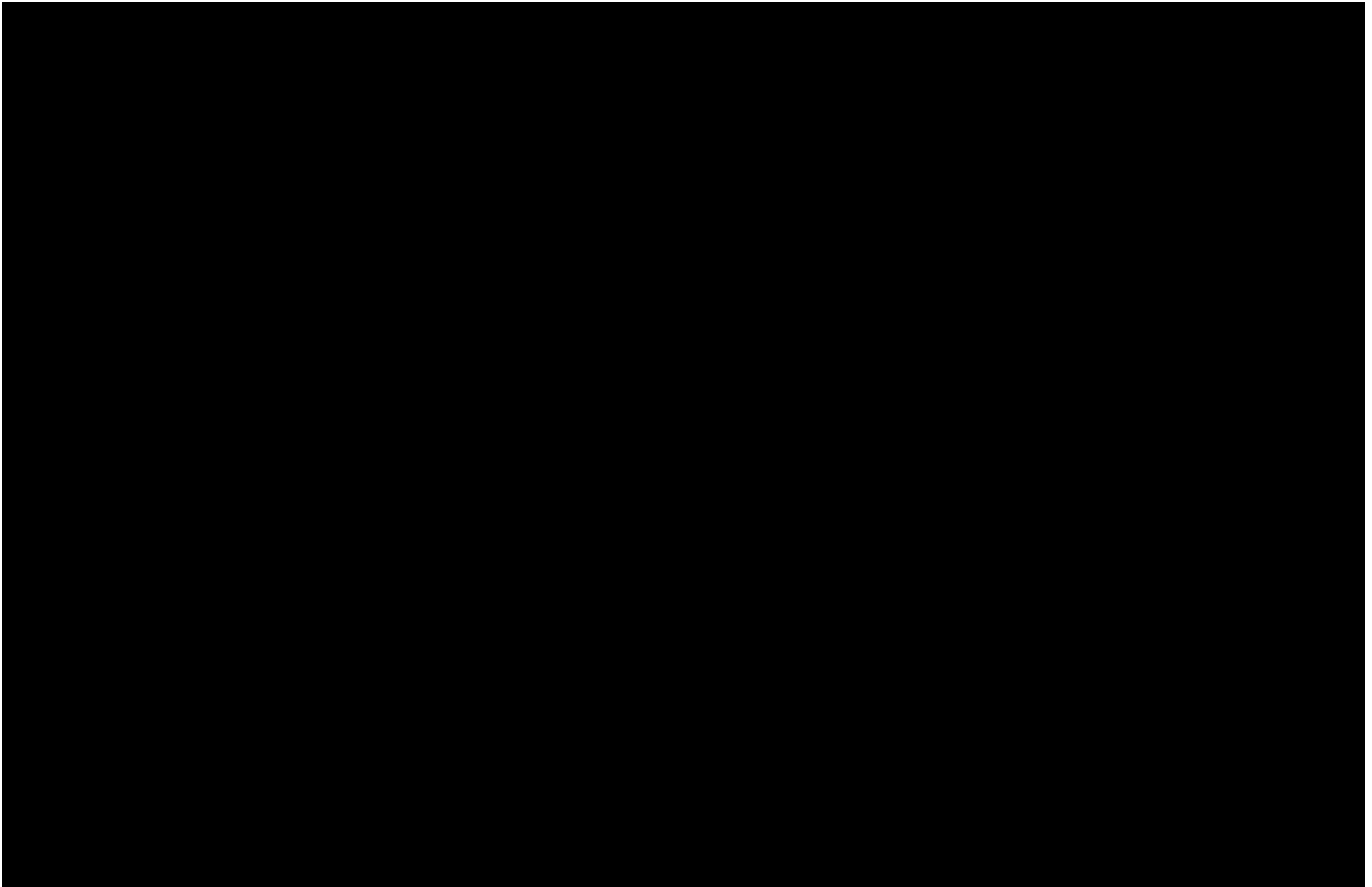
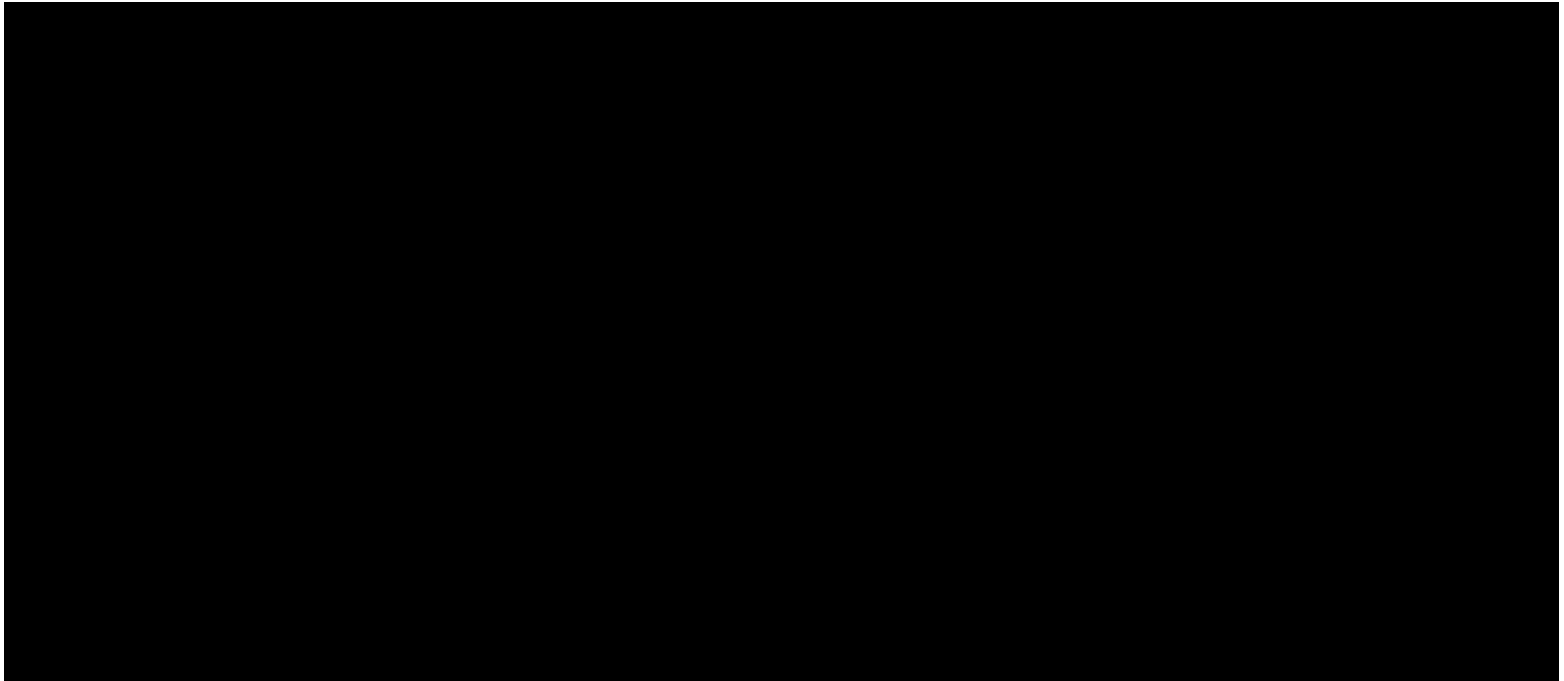
Advertisement Requirements



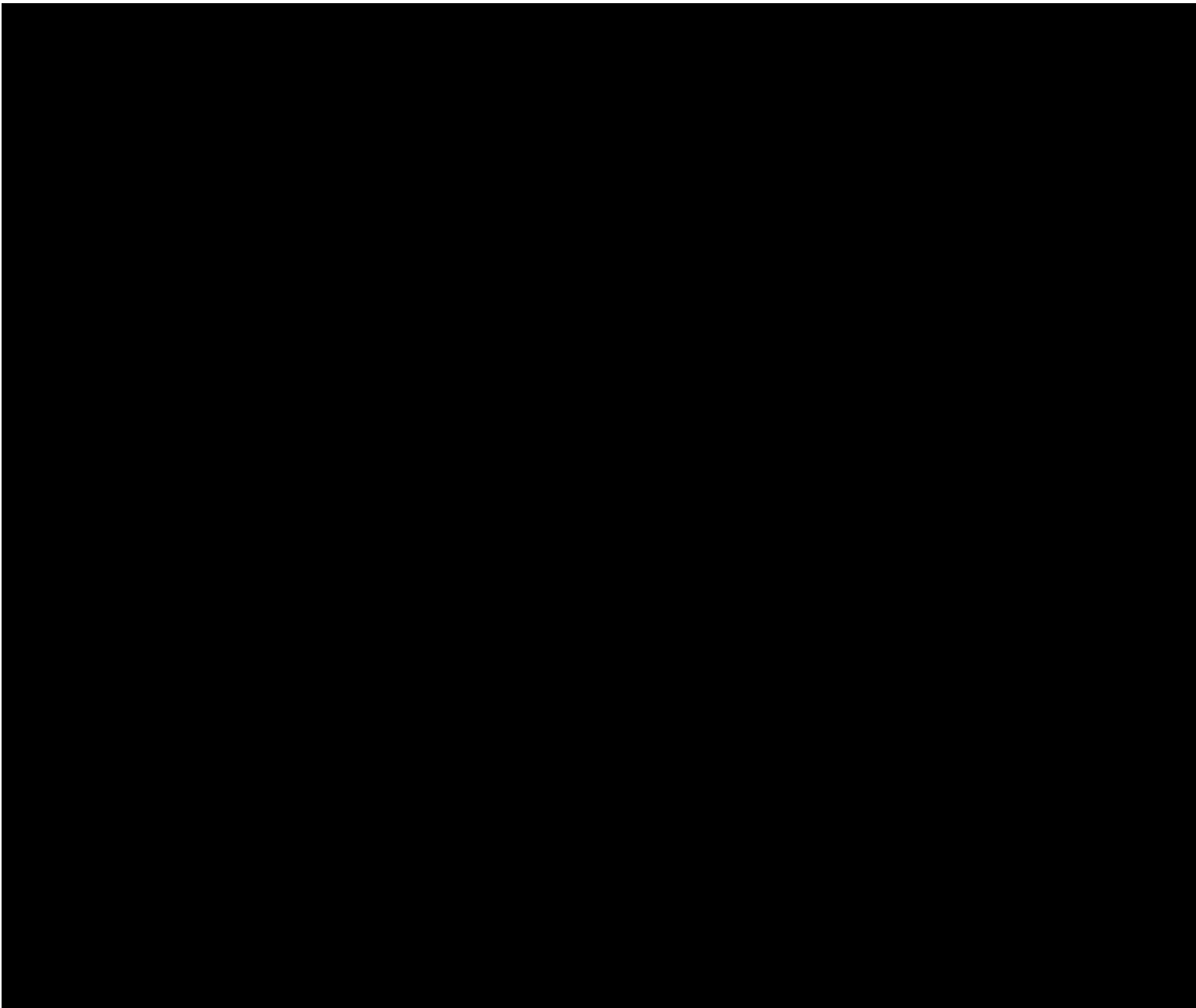
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Private & Confidential



Private & Confidential

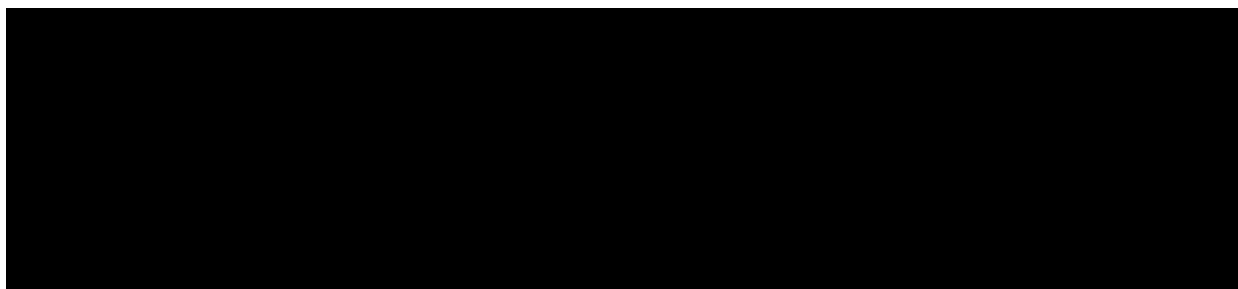


6.4 CAPACITY TO BRING AUTHORIZED SPORTS BETTORS TO PLATFORM

The Applicant shall demonstrate the Applicant's ability to effectuate rapidly the commencement of mobile sports wagering on the Applicant's platform and to bring Authorized Sports Bettors effectively onto the Platform.

The Applicant shall provide a time from award of license to the date on which each Operator shall be prepared to accept mobile sports wagers through the Applicant's Platform.

Response:



6.5 WORKFORCE DIVERSITY

The Applicant and each of its Operators shall provide information demonstrating how the Applicant fosters racial, ethnic and gender diversity within the organization's workforce. Such demonstration shall include:

- A. the organization's policy on workforce diversity;

- B. workforce demographics demonstrating the organization's current workforce diversity; and

- C. efforts the Applicant and Operators will undertake to foster workforce diversity as it relates to operations undertaken pursuant to a License, if awarded.

Response:

██████████ is committed to diversity, inclusion, and equal opportunity employment. Our goal is to develop and retain team members who, in addition to providing excellent customer service, share our commitment to inclusion and equal opportunity without regard to race, color, religion, national or ethnic origin, gender, sex, sexual orientation, gender reassignment, identity, or expression, age, disability, veteran status, membership in the uniformed services, genetic information or any other protected characteristic. ██████████'s policy of inclusivity is extended to guests, employees, customers, vendors, and the community in which we operate.

██████████ promotes diversity through its recruitment, selection, orientation, training, retention, and career development opportunities. We strive to maintain a diverse workforce by using an objective, metric-based interview process, integrating inclusion and diversity-minded practices throughout the recruiting process, and using online employment websites and local professional organizations and networks that primarily include women and minorities for posting job opportunities.

██████████ supports a Diversity & Inclusion Committee, which meets regularly to discuss diversity issues within the organization, as well as promoting events to create diversity awareness.

Diversity and inclusion and is a foundational pillar of the ██████████ talent strategy, as a cornerstone to how we attract, hire and retain our employees.

We also continue to extend our strong community partnerships while expanding our geographic footprint. ██████████
██████████

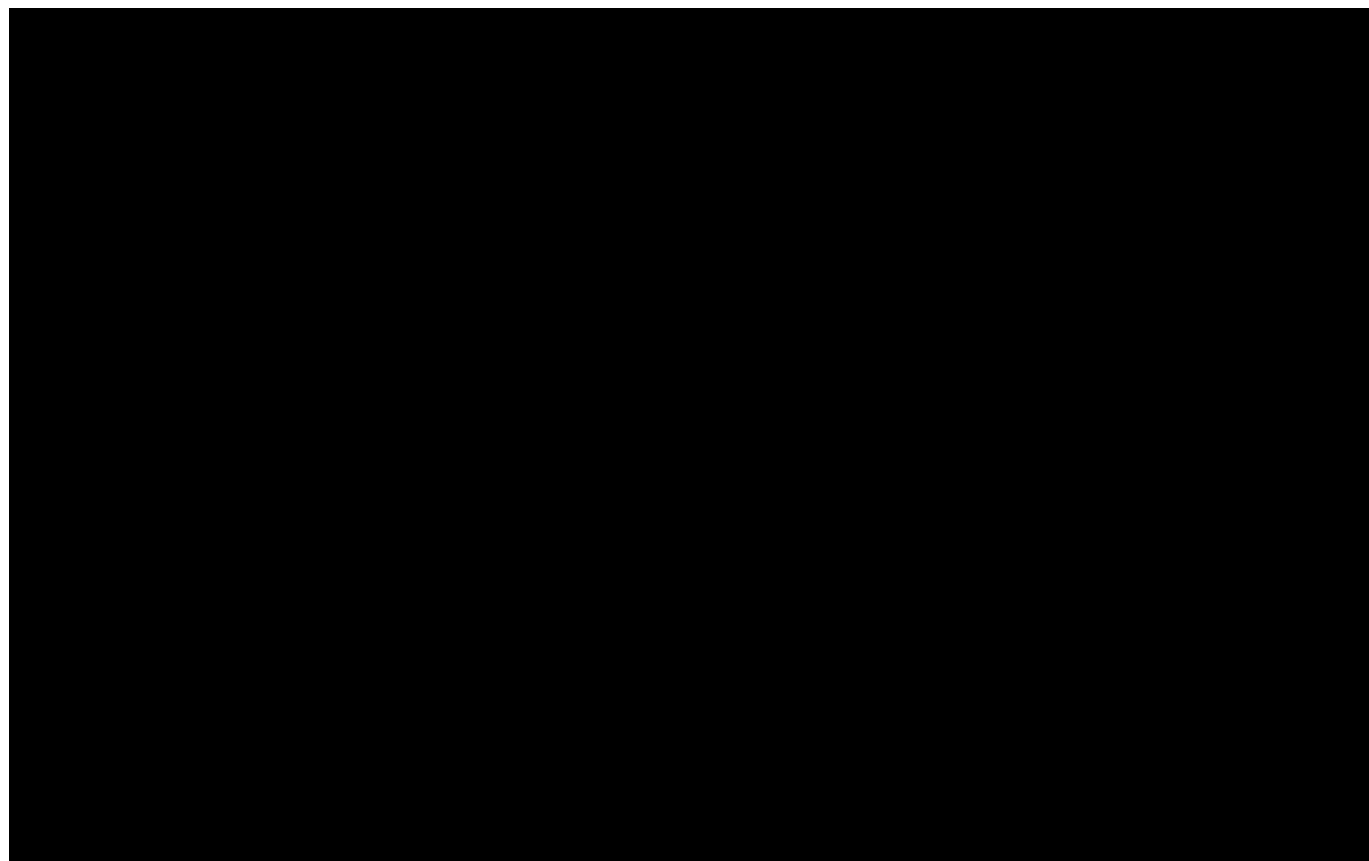
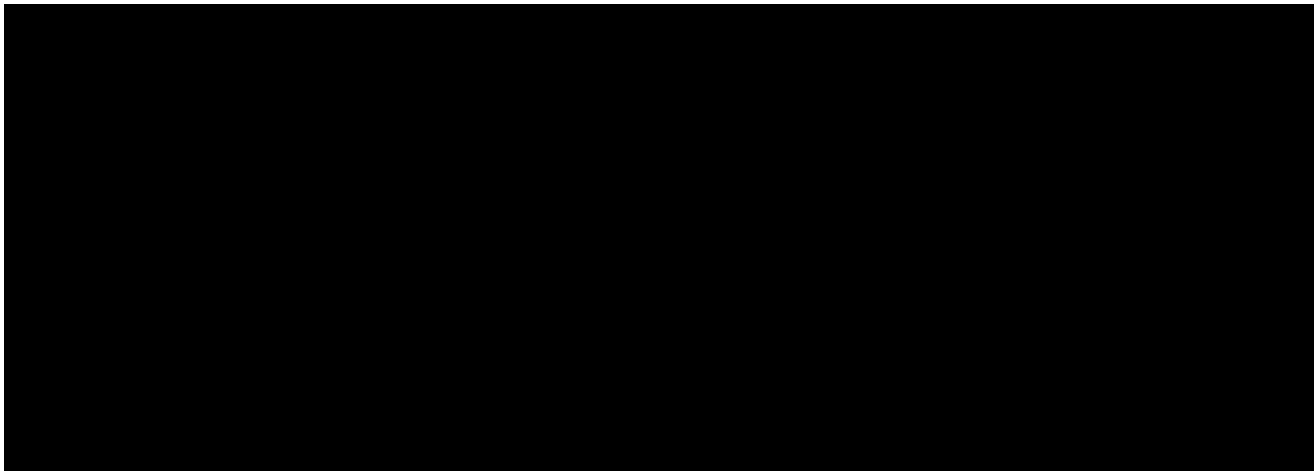
The following guidelines have been developed to promote labor hiring preferences and diversity programs:

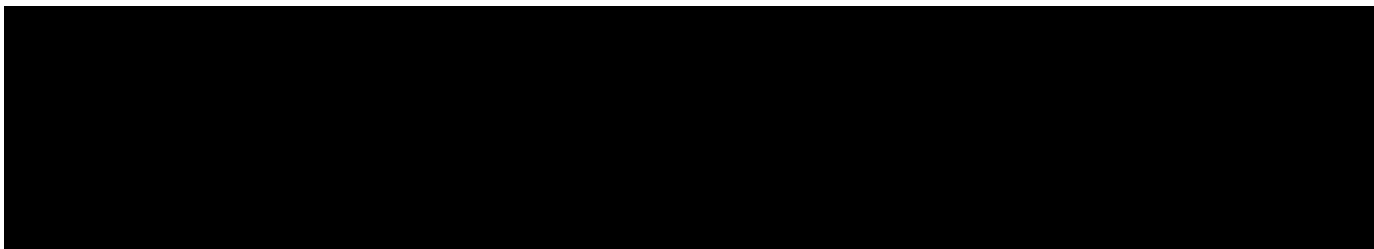
- Employment:
 - o Build and enhance relationships within the community to raise awareness and identify potential candidates for employment
 - o Foster an inclusive work environment that results in both personal and business success
 - o To have a respectful and supportive workplace that enables us to attract and retain a diverse workforce that represents our customers and community
- Procurement/Vendor Purchasing:
 - o Build and enhance relationships within the community and industry to raise awareness and identify qualified vendors
 - o Include minority and women business enterprises, as well as other diverse groups
 - o Ensure that all qualified vendors are given equal access to bid on our business
- ██████████ recruiting efforts include, but are not limited to:
 - o Posting employment opportunities across various advertising channels
 - o Attendance at community job fairs sponsored by local institutions of higher education, media and diversity groups
 - o Focusing on offering employment opportunities for those whose educational path is not pursuant to a traditional four-year degree

- o Partnering with alternative programs where people can develop and grow within their career, regardless of obtaining a formal degree

6.6 OTHER FACTORS IMPACTING REVENUE TO THE STATE

The Applicant shall provide a narrative and analysis of any other factor or aspect of the Applicant's Application that the Applicant believes the Commission should take into consideration when evaluating other factors that could impact the revenue from mobile sports wagering paid to the State. The applicant shall limit all narrative and analysis in response to this section to no more than five pages.





6.7 REVENUE-SHARING AGREEMENTS

If applicable, an Applicant shall provide an executed copy of any agreement that provides for sharing of mobile sports wagering revenue with a Native American tribe or nation that is party to a compact with the State.

Response:

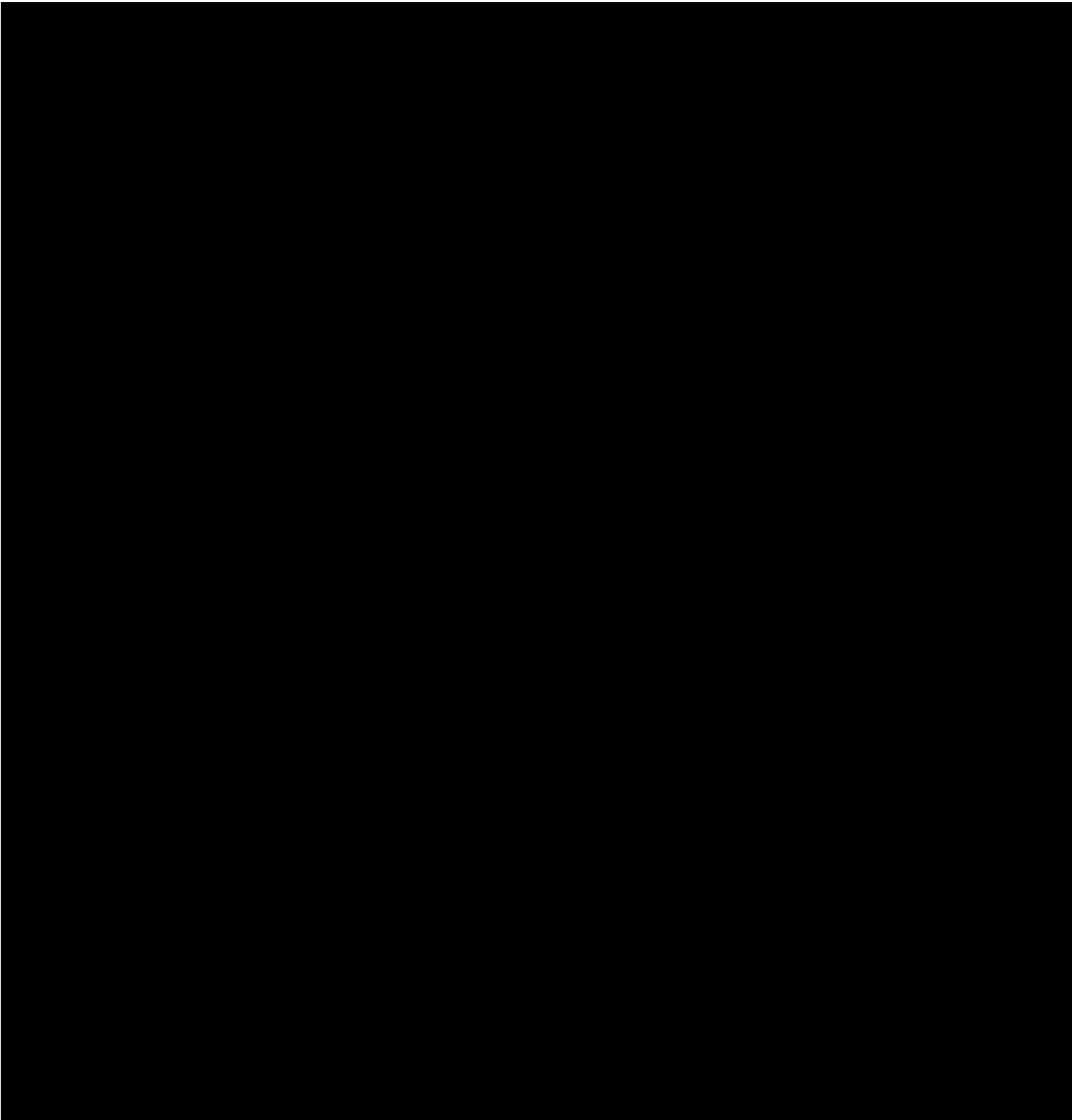


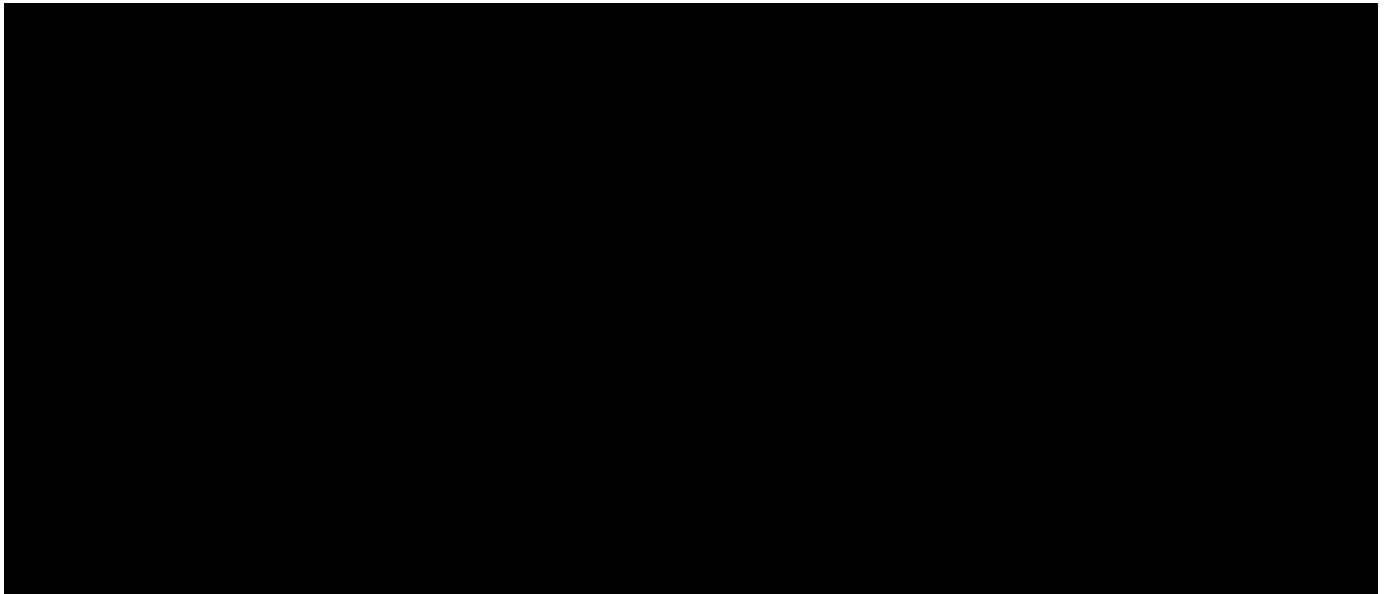
Exhibit 6.7

CONFIDENTIAL LETTER OF INTENT

This Confidential Letter of Intent (this "Letter") is entered into as of August 4, 2021 between TSG Interactive US Services Limited, a Delaware corporation ("TSG"), and [REDACTED]

[REDACTED] The parties have reached an agreement in principle regarding the Transactions (as defined below), and, as a result, this Letter is intended to create a binding obligation on each party with respect to consummating the Transactions. Capitalized terms used herein but not otherwise defined shall have the meanings in the Agreement (as defined below). Article 14 (Dispute Resolution) of the Agreement is hereby incorporated by this reference as part of this Letter *mutatis mutandis*.







6.9 INTERNAL CONTROLS

The Applicant shall provide a draft of its proposed internal controls in regard to the operation of mobile sports wagering in this State and a draft of the proposed internal controls of each of the proposed Operators for the Applicant's Platform in this State.

Please see Exhibit 6.9 of this Application.

Exhibit 6.9



