

An overview of the wagering activity conducted through the Platforms

Kambi operates a single Sports Wagering Platform, which has been developed over more than a decade to not only offer exciting wagering experiences, but to do so in multiple regulated markets across the world in a safe and scalable way. Uniquely, Kambi is 100% focused on the sports betting vertical, and therefore every cent of its investment is channeled into improving the Sports Wagering Platform and the player experience on a continuous basis.

More recently, Kambi has taken its Sports Wagering Platform to the US, where it has been successfully deployed in more states, and by more operators, than any other Platform, providing players across the country with the most exciting sports wagering experiences available.

Success in the United States was demonstrated shortly after the fall of PASPA in May 2018, with Kambi making history by taking the first regulated online bet outside of Nevada in August 2018. Since this landmark achievement, Kambi and its partners have secured similar market firsts in 10 states, including New York State, with that number set to grow as more states regulate sports betting. As a result, Kambi has become the leading Sports Wagering Platform provider in the US, processing millions of wagers and generating millions in tax dollars for the respective states.

The Kambi Sports Wagering Platform processes high volumes of wagers in regulated markets across the world – regularly tens of thousands of wagers per minute - leveraging the learnings and experiences gained from subsequent data points to continuously iterate and improve the service provided to our partners. In the three months up to June 30, 2021, Kambi processed sports wagers from more than five million accounts, with each bet analyzed upon placement for data points that can improve the risk management and odds making processes. By doing so, Kambi can optimize hold rates, which in turn increases handle and leads to greater revenue returns.

Having launched in 14 US states and counting, approximately 40% of Kambi revenue is now derived from the country through partnerships with major US operators, including Penn National Gaming, Rush Street Interactive, DraftKings, Seneca Gaming Corporation and Churchill Downs. These operators all identified Kambi as the trusted Sports Wagering Platform with which to launch their sportsbook operations in the country, with Penn Interactive and Fanatics both selecting the Kambi Sports Wagering Platform to support their respective sports wagering activities in the forthcoming online wagering market in New York State.

As the global leader in Sports Wagering Platform provision, Kambi is excited to be involved in the NYSGC's RFA process and the prospect of working together to ensure a successful online wagering market in New York State, both in terms of the enjoyment of citizens and revenue generated for the state.

The only Sports Wagering Platform specialist

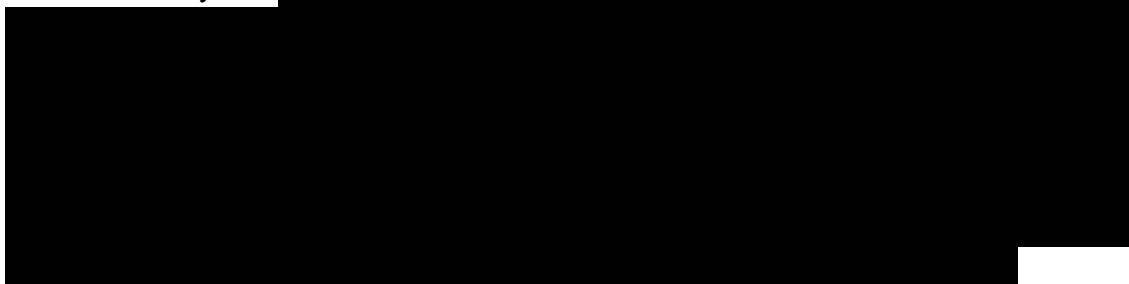
As referenced above, Kambi does not operate as an operator, neither does it offer any other wagering vertical, such as poker or casino. The result of this unique dedication to sports betting alone is the pure focus of resources on the delivery of a high-performance Sports Wagering Platform. This is just one of the key reasons why, for example, Kambi was able to process three times the number of wagers for Super Bowl LV (2021) than it did during the 2020 event. Other Kambi performance indicators include:

- More than 6.5 million active mobile player accounts - 2 million of which are in the US
- 42% GGR market share across the US states Kambi operators were present, and 33% of the entire US market in 2020
- Launched in 14 states with 10 market-firsts across the US
- More than 40% annual increase in active players (December 2020 vs December 2019)
- 50% annual increase in NFL player props (such as player specific rushing yards or sacks by an individual player)

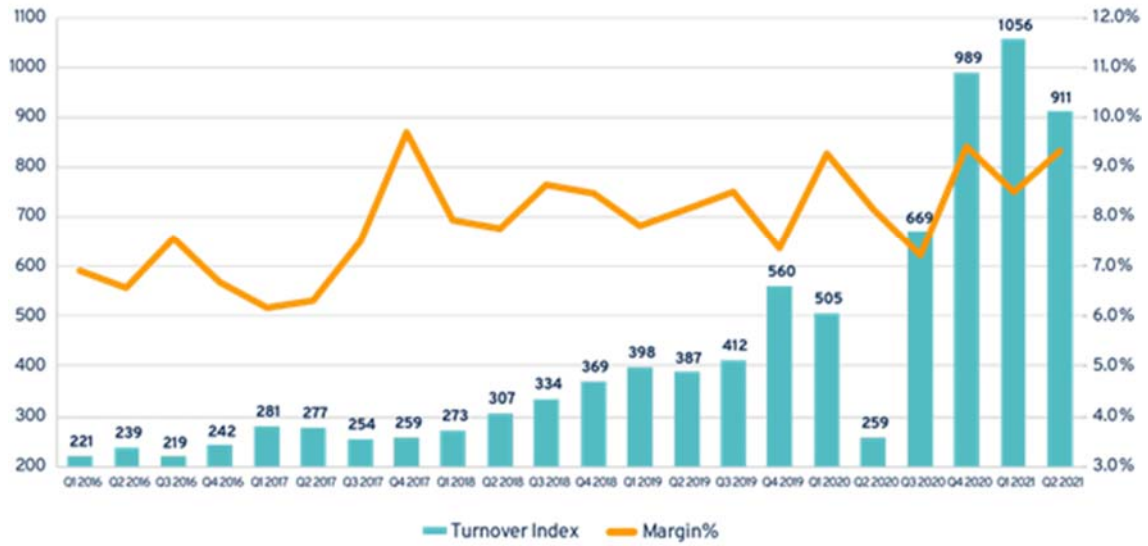
Generating revenues across a growing network

Kambi presents its partners' sports betting turnover as an index called The Kambi Turnover Index, with the first quarter of 2014 indexed at 100. In Q4 2020, operator turnover at constant exchange rates increased by 77% year-on-year, which can largely be attributed to the significant growth in the Americas market, expansion into newly regulated US states, and growth in Kambi's historical core European market. Furthermore, Q1 2021 produced record turnover, boosted by the NFL post-season games.

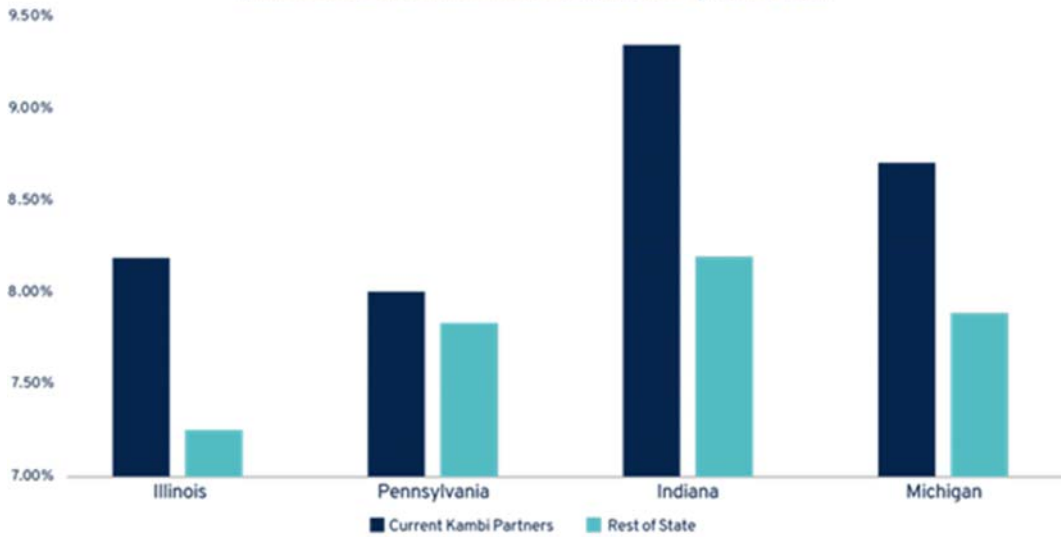
As illustrated below, the operator trading margin (hold rate) has typically been in the range of 7-9% in recent years.



Kambi operators' turnover and trading margin



Kambi vs. Rest of Market Hold Rates: January - June 2021



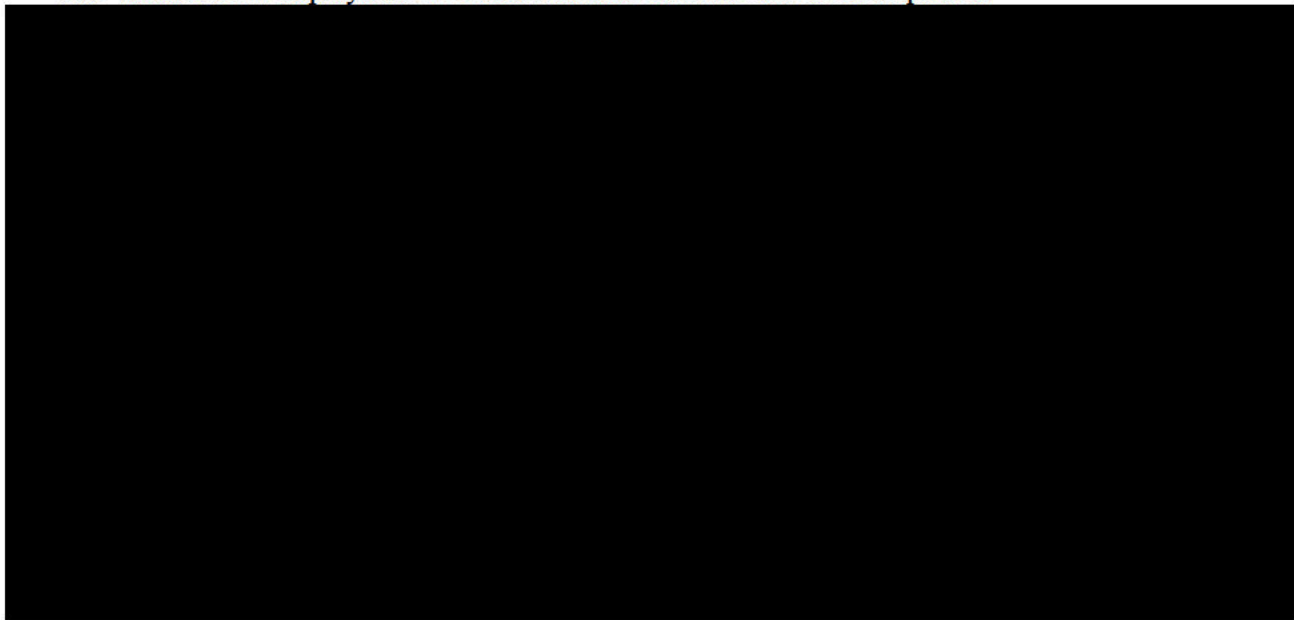
The number of accounts maintained through the Platforms;

As of June 30, 2021, Kambi maintains more than 6.5 million online player accounts globally, with nearly 2 million of those bettors in regulated US jurisdictions, which is one of the largest, if not the largest number of accounts maintained by any Sports Wagering Platform provider in the US. This is highlighted by the breakdown below.

| Accounts Maintained July 1, 2020 - June 30, 2021 | Online Accounts Maintained |
|---|-----------------------------------|
| US | |
| Rest of World | |
| Total | |

To arrive at these figures, Kambi’s talented team of data analysts filtered through Kambi’s network data, pulling all betting records from the previous 12 months, ending June 30, 2021. An account was defined as “maintained” if Kambi’s network showed an updated record within that 12-month period. A record update could mean anything from a bet settling, bet placement, or any type of interaction that would impact a player’s wallet.

Kambi’s expansive reach originates from years of strategizing, improving operations, and adapting to new regions, all in the name of creating the best wagering experience for each of those 6.5 million users. As you can see below, this has been a steady growth story for Kambi. The visual below displays the accounts maintained at the end of each quarter.



While the US market has driven the majority of recent growth, the current size and scale of Kambi’s maintained account-base highlights the strong foundation it built in Europe and has now translated to the US.

Wagering volume processed annually through the Platforms

In the previous 12 months (ending June 30th, 2021), [REDACTED] across its global network, both retail and online (evidenced below). 97.7% of those wagers came from online and mobile solutions, showing the stability of Kambi’s online Sports Wagering Platform and preparedness to deliver for New York’s 13.5 million adults and those travelling across state borders into New York. To no surprise, the growth of accounts maintained (mentioned above) has resulted in a significant uptick in volume and load managed by the Kambi platform. More information on how Kambi can handle high peak volumes can be found at 6.2.A ‘Minimizing downtime/increasing uptime’.

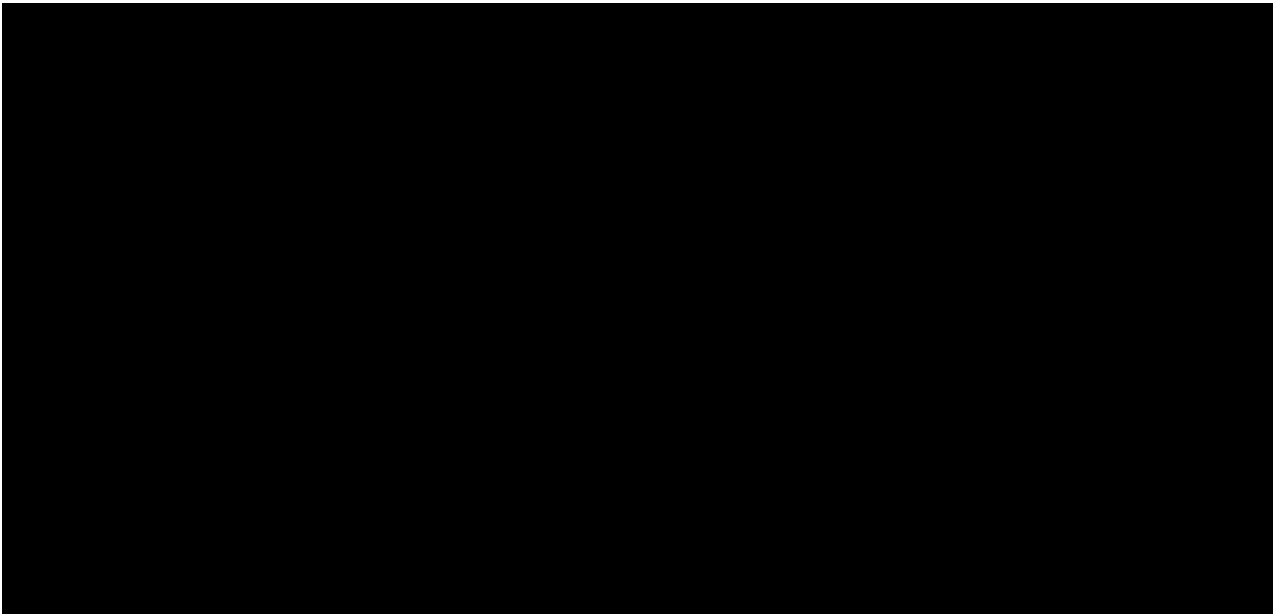
| Wagering Volume by Region July 1, 2020 – June 30, 2021 | Online Volume (# of Bets) | Retail and Online Volume Combined |
|---|---------------------------|-----------------------------------|
| US | [REDACTED] | [REDACTED] |
| Rest of World | [REDACTED] | [REDACTED] |
| Total | [REDACTED] | [REDACTED] |

Kambi’s network has experienced significant increases in each of the last four quarters, coinciding with the rollout of new states, and continued growth across its existing operations. This trend is one that Kambi knows will continue and is well equipped for the significant increases in transactions and traffic in years to come.

The below graph displays the previous 12 months wagering volume, re-assessed at the end of each quarter. Ex: Q4 2020 represents the wagering volume from January 1, 2020 – December 31st, 2020 (the last day of Q4).



| Handle by Region July 1, 2020 – June 30, 2021 | Online Handle (USD) | Retail and Online Handle (USD) |
|--|--------------------------------------|---|
| US | | |
| Rest of World | | |
| Total | | |

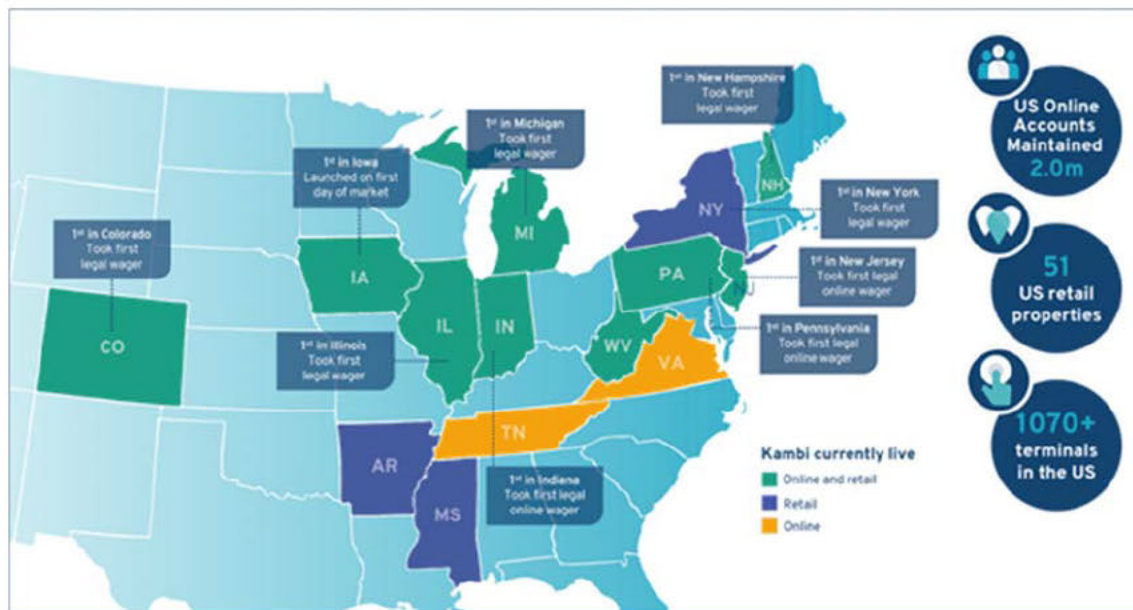


The above graph represents the previous 12 months handle at the end of each quarter (ex: Q1, 2021 represents the period: April 1, 2020 – March 31, 2021). As you can see, the US online market has become an instrumental part of Kambi's success.

The jurisdictions where the Applicant operates the Platforms;

Kambi is the world's leading Sports Wagering Platform provider, operating in more than 35 regulated jurisdictions across six continents. This position was recently illustrated when Kambi claimed major honors at both the EGR B2B Awards and the Global Gaming Awards, winning a total of five categories including best sportsbook supplier at both awards, which are independently adjudicated by Deloitte and KPMG respectively. Moreover, Kambi has consciously avoided operating in markets where sports betting is prohibited, with this a decision taken at inception. Not only is acting in a responsible way a core value at Kambi, but we also appreciate stakeholders in the US and further afield will only seek to engage with those who are able to demonstrate they have acted, and continue to act, lawfully and responsibly, displaying high levels of probity throughout its history.

In the US, Kambi has launched in 14 states and counting. Of those 14 states, Kambi was first to market in 10, taking either the first bet or launching on the first day of the market opening, including in New York State. For online sports wagering, Kambi has launched into 11 states, showing that in the three years since the fall of PASPA, Kambi has vast experience across a variety of regulatory regimes and a diverse set of consumers. Below we display Kambi's reach in the US as per Q2 2021.



Kambi’s global scale should not be underestimated. Shown below is Kambi’s international reach. The global experience highlights the expertise of Kambi’s operations, flexible to the consumer needs in any corner of the globe. This reach also provides millions of additional data points with which Kambi uses to inform operations in areas such as compliance, risk, trading and product development, which we give more detail on in subsequent sections of the application.

| Major Regions | Current Operational Countries and States |
|---------------|---|
| United States | Arkansas, Colorado, Illinois, Indiana, Iowa, Michigan, Mississippi, New Jersey, New York, Pennsylvania, Tennessee, Virginia and West Virginia |
| Europe | UK, Spain, Germany, Sweden, Belgium, Estonia, Denmark, Italy, Latvia, Romania and Malta |
| Australia | Australia |
| Latin America | Mexico, Colombia, and Argentina |
| Asia | Cambodia |
| Africa | South Africa |

Current integration of the Platforms with other wagering operators

More operators have chosen Kambi, above any other Sports Wagering Platform supplier, to be their trusted partner to launch sports betting in the United States. In total, Kambi has integrated its Sports Wagering Platform with more than 30 partner operators worldwide, with eight of those in the US. The unrivalled experience gained from 100+ launches across the globe has enabled Kambi to develop a refined and regulated integration process, flexible to any operator and jurisdiction.

100% Delivery record

Kambi has consistently proven that it leads the industry in terms of speed to market and integration excellence. We are proud of our 100% on-time delivery of past integration deliverables and work actively through support, top class documentation as well as relevant, stable functionality and interfaces to reduce the risk of delays.

Kambi powered a launch every 9-10 days in 2020

The ability to launch online at pace in New York State has been earmarked as an important factor in the RFA decision making process. Kambi has an unrivalled track record in this regard, with numerous market first launches, not just with one operator, but across our network of operators. For example, Kambi supported the simultaneous launch of four operators on day one of the Michigan online market going live in January, taking the first regulated online sports wager in the process. Furthermore, in 2020, Kambi powered more operator launches than any other Sports Wagering Platform in the US sports betting market. In total, Kambi powered the launch of 11 online and 28 on-property sportsbooks in 2020, which amounts to a launch every nine to 10 days. From a global perspective, Kambi has launched on average one operator on its Sports Wagering Platform every week for the past 18 months.

Kambi has powered 10 market-first launches

Since taking the first legal online sports wager post-PASPA, Kambi has solidified its position as the market's premier Sports Wagering Platform provider. Key to this success is Kambi's strong track-record of powering more market-first launches than any other sportsbook in the US. In total, Kambi has powered 10 market-first launches since 2018, most recently in Michigan where Kambi supported the simultaneous online launch of four partners within seconds of the market going live and, in the process, took the first regulated online sports wager in the state. Other states where Kambi and its partners have been first to go live include Pennsylvania, Colorado, Illinois, New Hampshire, New Jersey and New York State.

Market-first launches are a combination of Kambi's technical and regulatory experience, as well as the desire to best position our partner operators. Speed to market is an established differentiator in the early stages of a state's opening, which becomes particularly important when discussing customer acquisition. Kambi's more than 10 years of experience overseas, and now across the US, has enabled the company to build a rollout playbook - backed with a wealth of licensing experience. As a result, when Kambi applies for a sports betting license in

a new territory, there is hardly a hurdle or sticking point not yet faced and remedied by Kambi. This allows us to be ready as soon as the green light is given, enabling our partners to capitalize on the long-term benefits of early customer acquisition.

Integration Process

The integration pathway is standardized, meaning there is a single integration pathway customized to the operator. To assist in platform integration, Kambi has a dedicated Integration Delivery organization that manages all aspects of integration projects. Kambi assigns a dedicated Integration Manager for each integration project, serving as the main point of contact throughout the process. There is also a dedicated development team for customer integrations. Should Kambi’s application be successful, these finessed processes will be adopted to ensure a short launch timeframe.

Five Notable Rollouts

| <p>Sportsbook Name</p> <p>Parent Company</p> <p>Website</p> | <p>US States Launched with Kambi</p> <p>*denotes first to market</p> | <p>Description</p> |
|--|--|---|
| <p>Barstool Sportsbook</p> <p>Penn National Gaming</p> <p>Barstoolsportsbook.com</p> | <p>PA, MI*, IN, & IL</p> | <p>Kambi and Penn formed a partnership in August of 2019 and quickly embarked on a retail and online roll-out. Since then, Penn has managed to grab sizeable market share through creative marketing to grow the overall size of markets rather than cannibalizing market share. The most notable launch to date came in the state of Michigan in January 2021. At the time of the launch, COVID’s impact and damage was at its peak. Penn leveraged the launch of their sportsbook in the state to support local businesses, matching all opening weekend deposits with donations to local Michigan restaurants and stores. By the weekend’s completion, Penn and Barstool raised \$3.15 million in donations for Michigan small businesses, utilizing their</p> |

| | | |
|---|--|--|
| | | sportsbook to support the Greater Detroit and Michigan economies. |
| <p>BetRivers Sportsbook</p> <p>Rush Street Interactive</p> <p>Betrivers.com</p> <p>Playsugarhouse.com</p> | <p>NJ, PA*, CO*, IA, IL*, IN*, MI*, VA</p> | <p>Kambi and Rush Street have experienced a great deal of success since launching in the US, particularly in the largest sports betting markets. Since the June 2020 launch of online betting in Illinois, BetRivers has taken 25.1% of the state's \$314.8 million in online GGR (\$79.1 million for RSI). The highly competitive PA market has produced a similar success story, with the two brands of Bet Rivers and Sugar House taking a combined \$67 million in online revenue, good for 12.8% of the PA online market (\$525 million) since its opening. Rush Street Interactive will have the advantage of the Rush Street brick and mortar casino in New York State with which to build a sizable online market share in New York State, through an established customer pipeline.</p> |
| <p>Twinspires Sportsbook</p> <p>Churchill Downs</p> <p>Twinspires.com</p> | <p>PA, IN, MI*, TN, CO</p> | <p>After starting its US sportsbook venture under the Bet America brand and SBTech Sports Wagering Platform (now DraftKings in-house technology), Churchill Downs made the decision to migrate to Kambi's Sports Wagering Platform, leveraging the improved technology to rebrand and relaunch in just a matter of months, including a first to market launch in MI.</p> |

| | | |
|--|---|---|
| <p>DraftKings</p> <p>DraftKings</p> <p>Sportsbook.draftkings.com</p> | <p>NJ*, PA, NH*, NY, CO*, IL, IA, IN, TN*, VA</p> | <p>Kambi’s compliance and regulatory prowess enabled DraftKings to process the first regulated online wager in the US post PASPA (New Jersey). Since then, Kambi’s expertise propelled DraftKings to nine additional markets, including New York for retail. Kambi played an instrumental role in DraftKings’ early success in the US market. While DraftKings held a strong customer database from its Daily Fantasy heritage, they were 100% reliant upon Kambi’s superior Sports Wagering Platform to provide the core product, offering and technology. Simply put, without Kambi, DraftKings would not be in the position they are in today.</p> |
| <p>Unibet Sportsbook</p> <p>Kindred</p> <p>Unibet.com</p> | <p>US: NJ, PA, IN, VA</p> | <p>Kambi’s origins stem from Kindred/Unibet, and some seven years after the spin-off the partnership remains strong as ever. Kambi helped lead the renowned European brand to enter the US market. With a strong foundation in large European countries such as the UK, France, Ireland, Belgium and more, Kambi and Unibet have successfully introduced the US market to a time-tested European sportsbook powerhouse.</p> |

Additional information the Applicant believes relevant to demonstrate the Applicant’s experience

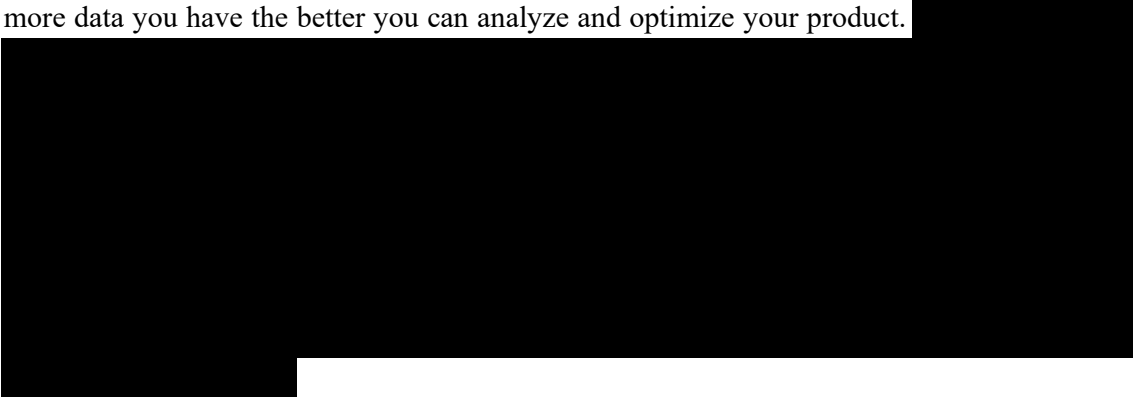
The unique ‘power of the network’ Kambi brings to the table

All applicants within this RFA bring different advantages to the bid, and Kambi is delighted to be submitting alongside them with the aim of creating a competitive and successful marketplace that will generate revenue for New York State. One of the crucial areas which sets Kambi apart from others is the fact that we are 100% focused on being a Sports Wagering Platform supplier and therefore are alone in having a strong and vast network of operators in regulated markets across the world on our platform.

The major network benefits to Kambi and those operating on our Sports Wagering Platform primarily come through the pooling of data and resources. In respect of this application, we believe it is pertinent to outline three key benefits and how these will lead to greater revenue generation for New York State.

1) Trading and risk management

As the Kambi network continues to grow, so too does the value it offers its partners. The success Kambi delivers is anchored in its ability to leverage its network data from a global player base, creating network advantages that increase as each new partner is added and existing partners grow. In short, the Kambi network is greater than the sum of its parts. Every player interaction or wager benefits each of Kambi's partners, whether they took the informative wager themselves or not. For example, a greater volume of data enables faster price discovery, thereby protecting and optimizing our partners' hold rates through the provision of more accurate prices at earlier points in the odds lifecycle. Kambi's models for odds generation, player categorization and risk management have been stress-tested, iterated, and improved using this ever-growing data set over many years. Sports betting is a data-driven enterprise: the more data you have the better you can analyze and optimize your product.



2) Sports integrity monitoring

In a similar vein to risk management, Kambi leverages its global network data to analyze betting patterns and identify, at an early stage, potential collusion and/or corruption. Kambi takes proactive steps to ensure its platform is as hostile to corruption as possible, but in the event that we identify suspicious activity, our global network enables us to act swiftly and work with regulators, governing bodies and partners to take necessary action. This wide and global net provides Kambi and its partners with the additional scope required to protect sports, players and operators from harm. This in turn protects the integrity of sports and sports betting, ensuring players have the confidence they need to wager on events taking place on a level playing field. Kambi has long been a leader in this field, was the first Sports Wagering Platform provider to become a member of the International Betting Integrity Association and works closely with sports governing bodies. For example, Kambi has been working with the International Olympic Committee since 2017 via an MoU and has been sharing network data insights to support the integrity of the Games held in Japan. Those that operate in the absence of such a strong global network will find themselves at a disadvantage in relation to integrity monitoring and therefore have greater exposure to harm. However, a Kambi presence in New

York State's online wagering market will provide additional protections to the entire market, with our global database giving us the ability to raise alerts at an early stage, therefore being advantageous to all.

3) Product offering and development

Providing a global Sports Wagering Platform to a global network of partners requires Kambi to maintain a leading product offering across all sports, not only the core US sports. The additional revenue a strong global product will bring to New York State would be crucial to meet budget targets. The US sports calendar ensures coverage of key sports throughout the year, however, these sports must be supplemented with an engaging offer throughout the sports menu, day and night. The importance of this was evidenced recently during the shutdown of most sports due to the pandemic. Operators that provided a weak offering on sports such as soccer, table tennis and darts, were unable to generate the levels of revenue seen at Kambi partners. Meanwhile, this summer's Olympic Games is also showing the benefits of having a Sports Wagering Platform provider that can offer quality right through the longtail of sports. Kambi can provide such depth to its offer thanks to its 300+ trading experts spread across our offices in Philadelphia, London, Malta, Manila, Bucharest, Stockholm and Sydney, who compile and trade events across more than 75 sports. Aided by traditional models and machine learning algorithms where possible, more than 450,000,000 odds are produced every month.

Summary (Two Page Maximum)

Scalable – proven to handle load

Kambi's wagering platform design has been focused on sports wagering since its inception. It is scalable in that the data from wagering activity has been analyzed and refined over the last 10 years to create the most efficient dataflow for handling high traffic sporting events. The wagering platform has also been designed to handle multiple operators' traffic from the start, so separation of data and handling potential operator load is designed into the system. Kambi have produced and deployed special hardware racks which are designed for the high peaks of sports wagering but also allow Kambi to scale horizontally (adding more machines) if required.

Safe – integrity

Kambi is one of the few Sports Wagering Platforms to operate a separate unit for sports integrity. We feed huge amounts of data into a traffic light system which flags up potential cases of fraud or match-fixing in sport. The frontline trading operations staff who monitor betting activity around the clock are all trained to spot and escalate at the first suspicion of irregular activity.

Thanks to advancements in technology, traders are supported and evermore superseded by real-time data analytics tools, for which bespoke match fixing algorithms have been written. These protocols and algorithms are continuously updated. All new episodes of suspicious activity see the population of our integrity database increase, with suspicious participants – teams, players, referees, umpires, etc. - blocked from our betting offering and action taken against accounts involved.

Network Risk solution

Over the years, Kambi has built a large and powerful network of bettors – millions of players situated across the globe whose bets and betting patterns are continuously monitored. This sophisticated monitoring enables us to categorize players into different categories.

Taking this approach ensures strength in numbers, with each operator benefiting from the scale of the Kambi network. Essentially, operating in this way allows us to be increasingly confident in our prices, and so too can our New York State operators. So, while we of course monitor our operators' liabilities and player activity at a local level, in order to ensure long-term profitability, it is our data-rich network which provides the edge our operators need to compete with confidence.

Operator Innovation

The Kambi platform is built to find synergies across our network of operators, and then use our technical resources to optimize the core betting processes and user journeys that affect all players.

With the basics in place, Kambi is handing operators the freedom to innovate on top of the platform with their own resources. Operators clearly want to invest in differentiated products, but remain reluctant to take the full cost of this in-house. Kambi's collaborative sourcing approach provides an affordable model for the future of innovation.

At Kambi, we believe the most successful operators will be those dedicated to creating a unique proposition on top of our platform, and our focus is firmly on facilitating this process. Operators will want to work with third parties on new innovative ideas, so a platform must be agile enough to cope with the demands.

Built for B2B

Kambi's wagering platform system was architected and built to serve operators purely from a B2B perspective. It was not designed as a pure B2C sports platform, which would not need to take operators' concerns into account and as such would be incredibly difficult to retrofit for multiple operators. Those systems are set up for a single operator and something as simple as a shared offering has not been considered from the start.

Built for diverse Regulations

Kambi is renowned within the industry for being a leading light in the field of compliance. We use official data sources where possible, obtain licenses where required, and maintain close relationships with sports governing bodies. Kambi has long been operating in jurisdictions with thorough and complex regulations, proving itself to be able to offer a competitive product within restrictive regulations.

Built by SB enthusiasts

Kambi is, in essence, a company of approx. 1,000 sports fans, half of whom are frontline trading operations staff. In fact, Kambi's success in the sports betting market spans two decades, initially as the springboard for Unibet to establish itself as a tier one global operator, and over the past 11 years as the B2B market leader with a global reach of Tier 1 operators, including DraftKings, 888, Rush Street Interactive and Penn National Gaming. This vast B2C and B2B experience, supported by continued investments in technology and talent, has proven to be a powerful combination, one which no other Sports Wagering Platform provider can match. Subsequently, Kambi provides operators with the highest quality product and technology along with sophisticated odds compiling and trading and risk management services which continue to exceed the market in terms of performance and growth for our operators.

Information in Addition to Summary

An overview of the technical features and operation of the Mobile Sports Wagering Platform

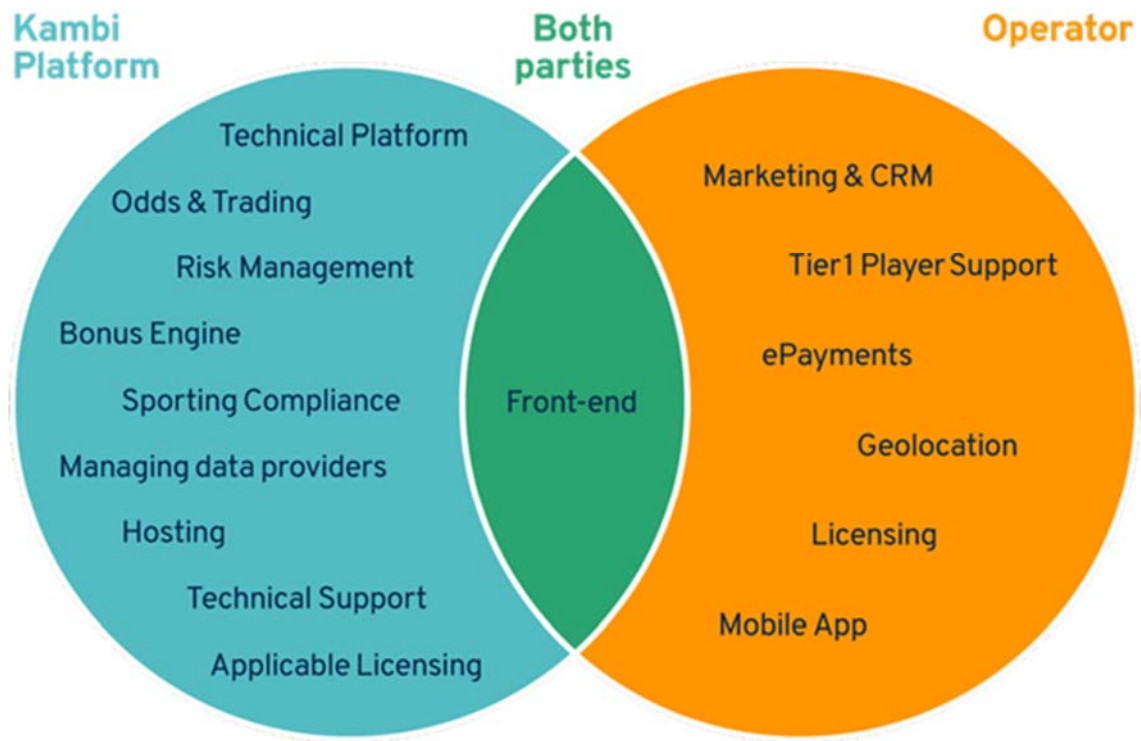
The Kambi Sports Wagering Platform

Kambi delivers first class wagering experiences to its end users through a scalable partnership model with leading global gaming operators.

At its core, Kambi's Sports Wagering Platform consists of event management, market and odds creation, bet placement via managed risk, bet settlement, and product compliance. Although Kambi provides many more services, these core features have been designed to allow a high level of operator differentiation to be applied, enabling the operator to create a sportsbook experience that is tailored to their players in their target markets. An example could be the price differentiation of odds offered on sports events and outcomes, or the ability to build a completely new front-end experience upon the Kambi Sports Wagering Platform.

The operator is responsible for the relationship with the end consumer, which includes areas such as marketing, payments and Know Your Customer functions. In simple terms, Kambi controls the sportsbook product (B2B), while our operators handle the distribution (B2C). This enables both parties to focus their resources on areas that will deliver the greatest impact. See below for the sports betting value chain and where Kambi and its partners sit within it.





In the sections below, we will give an overview of some of the technical features and operations that make up the Kambi Sports Wagering Platform:

Technical Platform



[REDACTED]

[REDACTED]

[REDACTED]

Kambi Odds & Trading

Kambi has 300+ expert in-house traders based across Philadelphia, London, Malta, Manila, Bucharest, Stockholm, and Sydney to compile and trade events across more than 75 sports.

This large, experienced trading organization allows Kambi to continually improve the markets and odds offered to the operator, ensuring the product is continually industry leading, thus mitigating the appeal of unregulated/offshore offerings.



Our Event management capabilities include:

- Longstanding partnerships with the official data owners (data feeds), so that scores come straight from the umpire/referee/official/scout, integrated straight into trading tools.
- Algorithms (models) built on a decade of iterations to get the kind of odds quality needed to achieve stable margins on challenging markets (the first in-game models were released in 2007).
- Real time, automated risk management capabilities to catch losses as soon as a part of our supply chain, such as a match official or scout, has variance in quality.
- Excellence in people. Traders who can spot both suspicious betting patterns, or unusual play from the participants that a model cannot see.
- UX focused culture. This has been our passion for 20 years, and as an example we have been offering the current game betting (in tennis) right to the last point since 2006.

Kambi Risk Management

Kambi offers a market-leading risk management solution, which is tailored to each operator's overall strategy, giving them confidence that bets and players will be managed according to their expectations. Risk Management is in effect the conduit between handle and revenues. If the handle is unprofitable for operators, it does not matter what tax rate the State implements. Kambi encourages the Commission to assess the risk management pedigree of the Platforms bidding in the RFA process.



Tailoring risk management to suit operators' risk strategies in New York State

Kambi's Sports Wagering Platform allows for its operators to set a risk strategy that works for them. This way, no matter the desired approach to market launch, Kambi's New York State operators will have confidence that Kambi will construct a risk plan tailored to their unique strategies and desired parameters. Kambi takes a consultative approach, given the amount of data and experience housed within its eight offices, but values its operators' inputs to define their sportsbook product.

Kambi Bonus Engine

Kambi has designed a flexible bonus system - empowering operators to execute their marketing strategy within the Kambi Sportsbook.

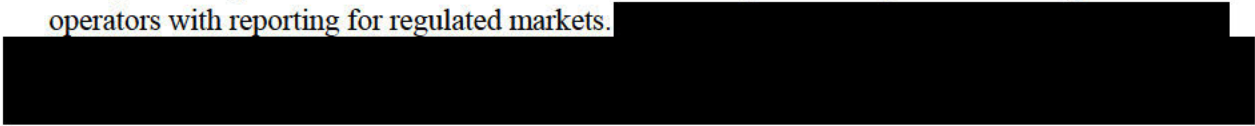


Bonuses are an effective way to engage and retain players.

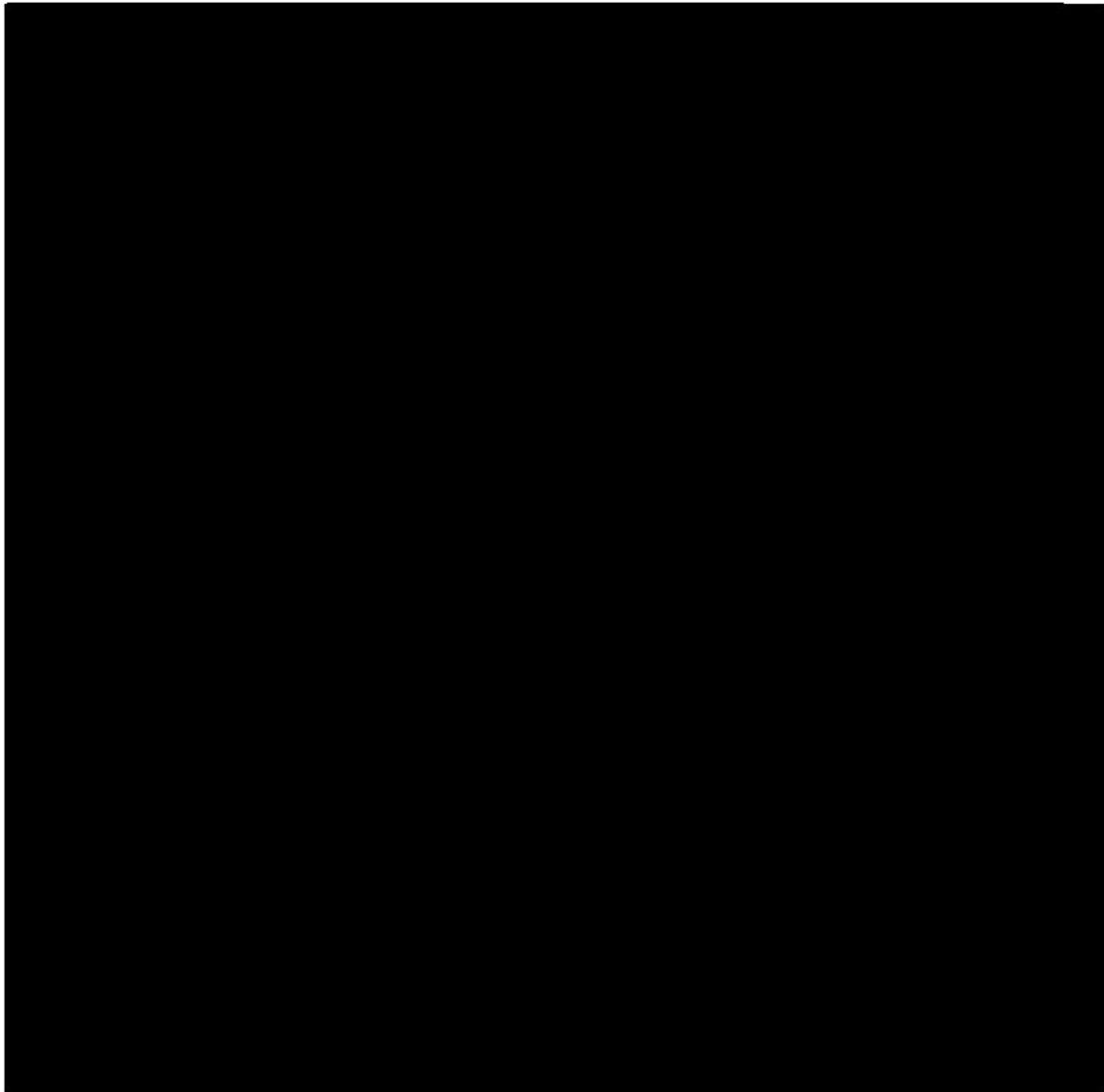


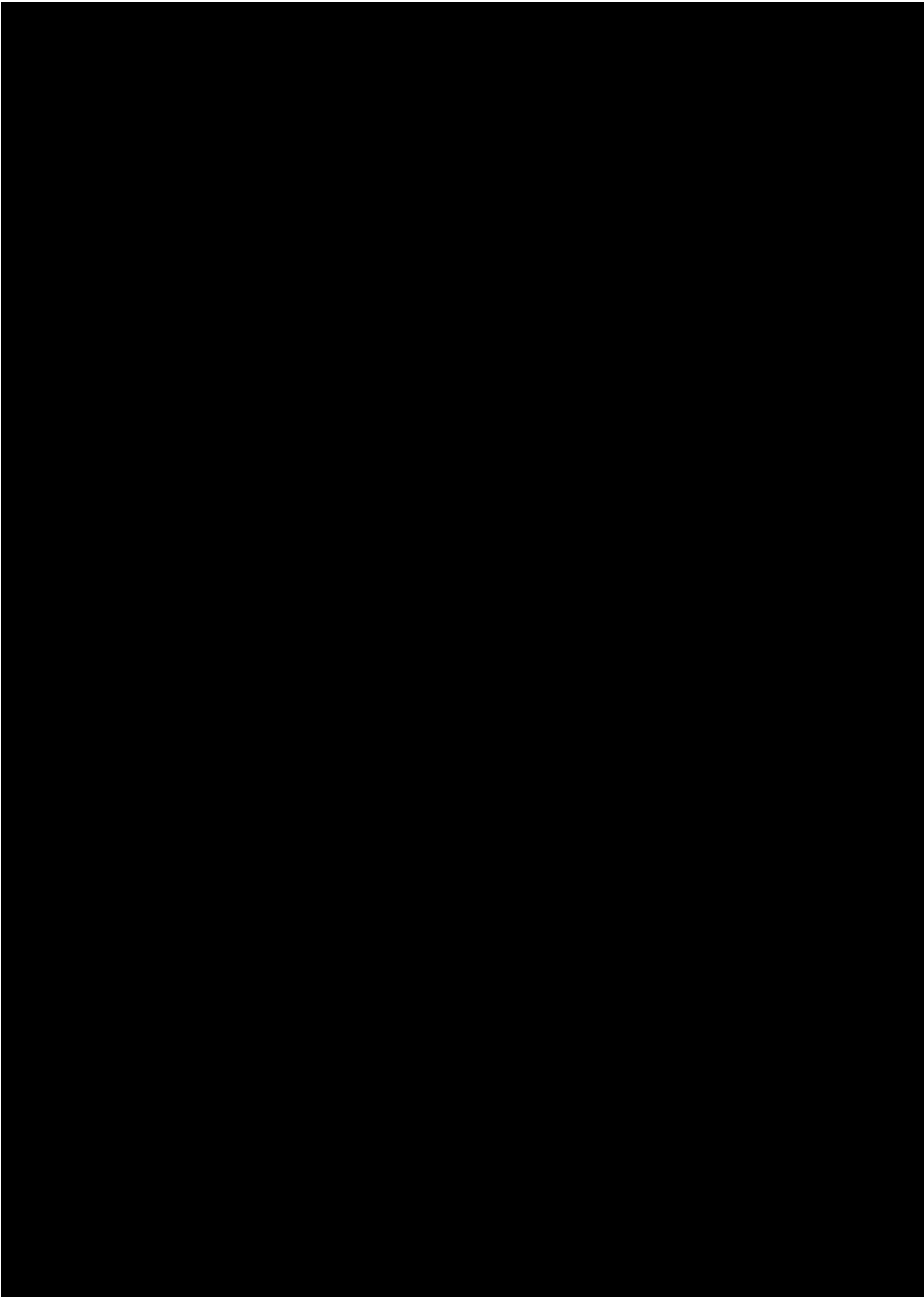
Sporting compliance

In each specific jurisdiction, regulatory compliance requirements necessitate that Kambi and/or the operator report transactional data. Kambi have designed multiple tools to support our operators with reporting for regulated markets.



Reporting can be fully customized in terms of data points and frequency. Data points on which Kambi provides reports include the following:







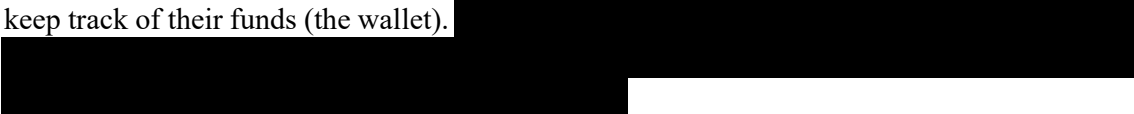
The Player's interaction with Kambi and the operator

The Kambi Sports Wagering Platform is an elegant system which allows Kambi to both concentrate on the heavy lifting of running a sportsbook and support operators' incumbent systems, such as a website, a CRM/player database or loyalty programs. Where the systems communicate, Kambi provides first class integration processes, APIs and documentation. This intelligent design of separation and support allows Kambi to operate at a scale and at a speed that has proven difficult to replicate by either its B2B competitors or B2C brands launching in new regulations.

A player flow in placing a wager

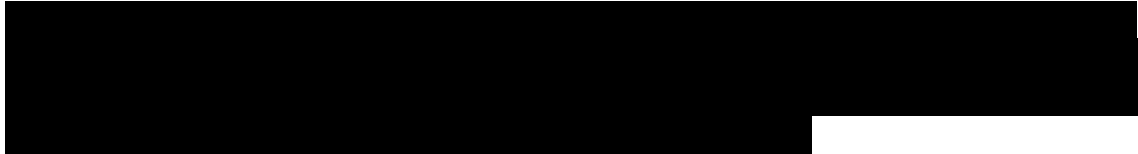
The player uses a browser on a computer or an app on a mobile phone to log in to the operator site or mobile application, navigate to the sports betting page and the Kambi sportsbook client. The player can decide to place a bet and at this moment the Kambi sportsbook client needs to contact the operator backend system.

The operator is responsible for the player data, authentication and payments. This means that the operator is responsible for authenticating a patron before he/she can place a bet (KYC) and keep track of their funds (the wallet).



Bet Acceptance Flow





An overview of how the Applicant will provide continual support and maintenance of the Mobile Sports Wagering Platform

Kambi is a Sports Wagering Platform provider, this is our 100% focus, and we invest heavily into our platform development capabilities by running large in-house development teams, with each team being specialized in core areas of sports betting. This continued investment means that new features and continued improvements are delivered on an almost constant basis.

The support and maintenance Kambi provide with regards to its platform can largely be split into two areas: 1) the essentials required to keep the platform running and remedy any issues as they appear, for example, solving a service issue due to an outage at a third-party data company. 2) Kambi doesn't look to simply maintain its service and platform but continuously invest to improve it, for example, reducing in-game delays to improve the UX for players.

Below you will find some examples of the work we do in both these areas to ensure our operator partners can perform to their highest levels.

Product & Engineering Continual Service Improvement (CSI)

Kambi strives to constantly improve its IT services. This is done in several ways:

- Reviewing current SLAs and seeing where improvement can be made to enhance Kambi's offering
- Reviewing, through customer feedback, areas where improvements can be made. This can be done through regular meetings with partner managers.
- Reviewing incident and problem management tickets monthly to see where improvements can be made
- Researching innovative technologies that will enhance Kambi's IT service
- Looking at more cost-effective IT solutions that will provide both customer and supplier enhancement.
- Regularly scrutinizing internal services and processes as part of being in regulated markets within the United States.

Incident Management

Kambi provides a manned service desk 24/7/365. The service desk is available via phone or online and internally via an incident tracking tool. Kambi classifies an incident as anything that impacts the operations of the Sports Wagering Platform, is something that needs immediate attention to resolve or avoid an impact on the goodwill, handle or offering of our service.

Event Management

All significant events are logged in a distributed search and analytics engine and provided access to from a user interface. In addition to the logging infrastructure all in components, the sportsbook provides monitoring data that is accessed from a real-time monitoring system that generates alarms, monitors availability, and provides data for capacity planning.

Problem Management

Problem management is mainly handled by the product owners at Kambi that are responsible for the development for all the teams. The product owners are responsible for prioritization and the solution for problems related to the service. Problems could be identified in the incident process, by internal users or by external users.

Minimizing downtime/increasing uptime

Kambi's engineering practices and software development lifecycle prioritize the stability, availability, and resilience of the Kambi Wagering Platform. Beginning with architectural principles all components of the Kambi Platform are designed for High Availability and Scalability; that is each component can be scaled up or down according to demand, and the overall system is designed to gracefully manage the failure of any given component.

Further non-functional requirements that all components must meet are related to observability and traceability, this allows our 24/7 Network Operation Center (NOC) team to maintain high awareness of the current state of the system and rapidly respond should any monitoring indicate action is needed. Our NOC can escalate as and when required to resources throughout the organization at any time to ensure minimal impact of any potential problem.

Kambi has a robust capacity planning function that spans across business units that uses historical data and predictive modelling to ensure our technology is prepared for future load. Our development teams actively test our software against high load scenarios to ensure we have ability to meet future system demands and have implemented any necessary change.

The volume of transactions that Kambi manages across our global footprint ensures that our processes and technical systems are well exercised and provides large amounts of data upon which we can continually improve and optimize the delivery of our service.

Constant evolution of trading models

[Redacted]

[Redacted]

[Redacted]

Increased automation and accuracy of player profiling to optimize revenue

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Driving down suspension times and rejected bets

Since Kambi started offering in-game betting almost 20 years ago, this area of quality in the experience has been a core KPI. [Redacted]

[Redacted]

The important parts of the supply chain that we continually drive improvement in are:

[Redacted]

[Redacted]

[Redacted]



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

Kambi offers multiple technical features, from multiple data APIs to client UX flexibility to each operator, these features are designed to allow the operator freedom to diversify their product offering to reflect their brand and market position.

Kambi Price Differentiation.

The Kambi Price Differentiation functionality gives the operator the possibility to alter the hold rates applied to betting markets. This feature is configurable on a variety of levels, for example, per league or per outcome. This means that no two operators on the Kambi Sports Wagering Platform need offer the same odds on any game or sport, giving them ultimate control over how competitive they want to be at any given time.

Kambi Application Differentiation

Power to differentiate comes through the Kambi Application Differentiation platform. This includes reusable graphical components and design patterns, great documentation, support and test data. In addition, Kambi's application programming interfaces (APIs) are designed to allow operators to mold content and user interfaces into unique experiences. At Kambi, we see it as our task to make sure any application development for the operator is light, while Kambi bears the burden of providing safe and relevant data and encapsulating complex business logic. Together, Kambi and the operator have a unique opportunity to leverage each other's skills and capabilities to create the best sportsbook experience in the world.

Kambi Data

Operators on Kambi's Sports Wagering Platform can gain access to player and betting data through its APIs. Kambi also provides real-time data, which can be consumed and actioned by the operator to trigger CRM campaigns, bonus offers, responsible gaming tools, etc. to personalize the experience for the players.

Kambi back-office tools

The 'Fieldbook' tool enables the operator to view all accumulated liabilities in real-time. It is one of the numerous tools used by our traders to aid decision making and is also made available to operators to view and monitor their own liabilities. The Fieldbook is updated with data in real time, has filters for risk, sport, bet offer type, start date, event name, user segments and has sortable and customizable columns.

The 'Bet History Viewer' tool enables operators to view players' bet history (transactional data related to bet placement and settlement) in the same way as the players see them in the client. Having the same view of the bet history as the players makes it easier for customer service agents to have the player perspective when answering queries, as they have the exact same information presented in the same format as the players.

Kambi Bonusing tools

The Kambi Bonus System enables for assignment of different types of rewards directly to players as well as wrap rewards into bonus programs.

The Kambi Bonus System is integrated into the UX for the player and into the management tools and APIs for the operator. It is based on a sophisticated model that supports different kinds of rewards. Kambi views the bonus toolbox as a strategic area and constantly develop its functionalities in order to strengthen our operator empowerment capabilities, supporting their marketing strategies.

Coupled with Kambi's real-time data APIs, bonus management can be applied in real-time. The main entities in the system are bonus programs and rewards. A reward is the actual bonus that can be used by a player, for example a free bet or profit boost.

Relevancy of bet offers



[Redacted]

[Redacted]

[Redacted]

[Redacted]

Provision of leading products and wagering features

Player Performance Props:

For the most popular sports, such as Basketball, Football, Hockey and Baseball,

[Redacted]

[Redacted]

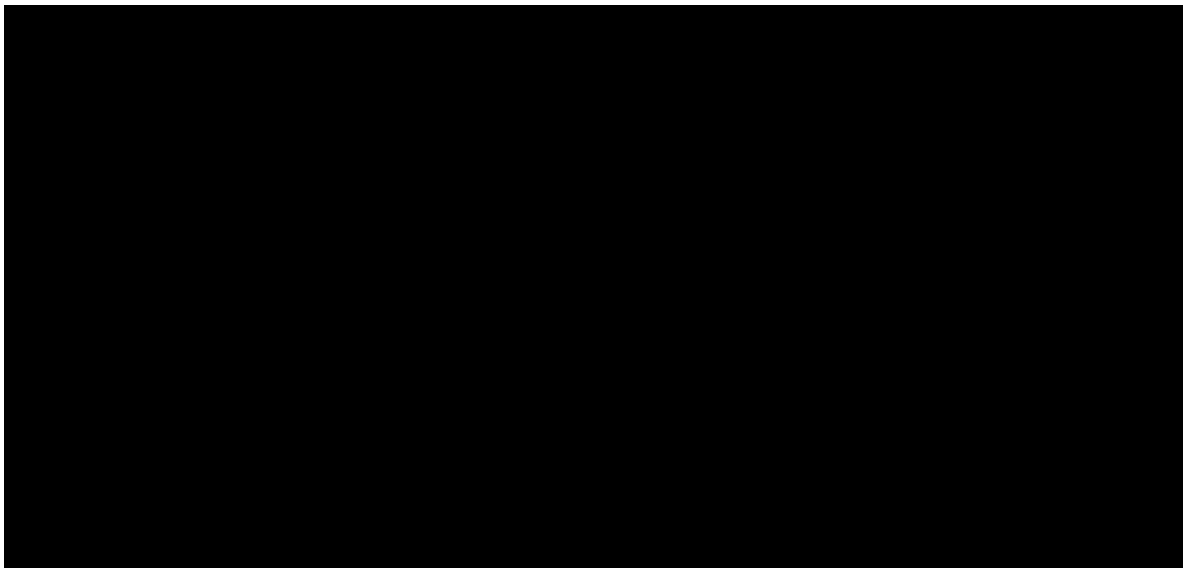
Instant markets:

[Redacted]

[Redacted]

[Redacted]

[Redacted]



When looking at data from the 2020-2021 seasons across the four major US sports, you can see that

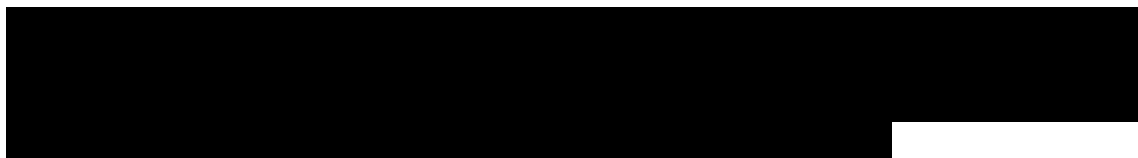


- [Redacted bullet point]
- [Redacted bullet point]
- [Redacted bullet point]

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

Combinability: The platform’s ability to allow players to combine multiple outcomes into a single wager

Combinability of wagers is key to Kambi’s product strategy. We have seen the rising popularity with players of both combining wagers between games and within the same game - between-game combinations are already the majority of pre-game bets. We also believe in long-term investment here because this expertise is difficult to copy – the complexity of related contingencies, particularly for within game combinability, means that the best algorithmic capability will have a significant advantage from a product perspective. Please see the answers above to ‘Ongoing improvement of trading models’ and ‘Increasing trading automation through richer data’ for more on Kambi’s approach to building this capability.



Parlay (8) @ 1803 ⌵ ★

Singles **Parlay** Round Robins Clear betslip

- ✕
 KC Chiefs -2.5
 Point Spread
 KC Chiefs @ Tampa Bay Buccaneers
- ✕
 Over 54.5
 Total Points
 KC Chiefs @ Tampa Bay Buccaneers
- ✕
 Kelce, Travis
 First Touchdown scorer - Including Overtime
 KC Chiefs @ Tampa Bay Buccaneers
- ✕
 BAL Ravens -6.5
 Point Spread
 Tennessee Titans @ BAL Ravens
- ✕
 Over 50.5
 Total Points
 Tennessee Titans @ BAL Ravens
- ✕
 Henry, Derrick
 First Touchdown scorer - Including Overtime
 Tennessee Titans @ BAL Ravens
- ✕
 Over 200
 Total Points
 Milwaukee Bucks @ Los Angeles Clippers
- ✕
 Milwaukee Bucks -2
 Point Spread
 Milwaukee Bucks @ Los Angeles Clippers

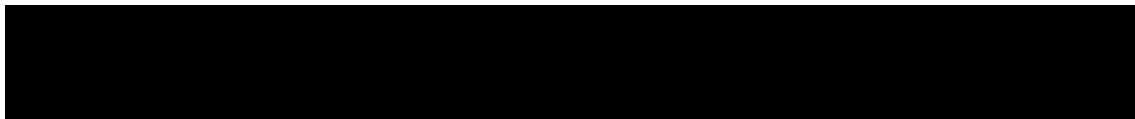
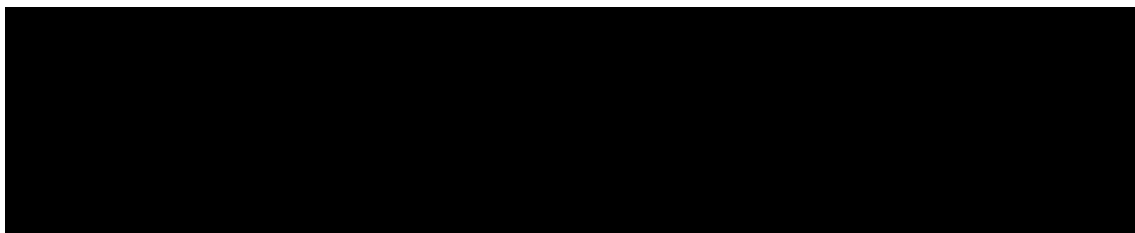
| | |
|-------------|----------------|
| Wager | To win |
| 1.00 | 1802.10 |


Parlay (8 Picks)

Odds: **1803**

Potential payout:
\$1803.10

Place bet





Additional information the Applicant believes relevant to demonstrate the Applicant's expertise.

Kambi has enjoyed unrivalled success as the industry's leading provider of end-to-end sports wagering solutions, delivering tier one operators the cutting-edge technology and knowhow to grow market share and strengthen their leading positions across a number of regulated markets, including in North America.

Global Expertise

Kambi's decade plus of experience across such a wide variety of jurisdictions, has thrown just about every challenge and situation imaginable (particularly the last year and a half, marked by the Coronavirus pandemic). This has allowed for years of teachable moments, not only for the company from a technical and business standpoint, but all the way down to the individual employees that drive the Kambi engine.

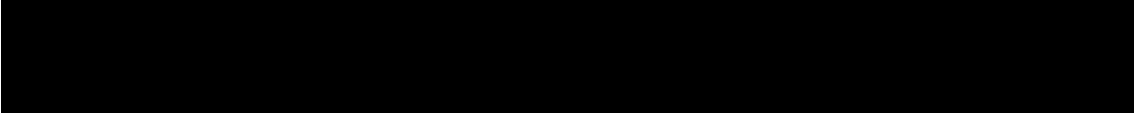
Kambi's management team comprises of industry veterans, who have a collective 100+ years of industry experience. This has allowed Kambi to build out a battle-tested strategy, that not only mitigates risk for Kambi and its operators, but is built out to be future proofed, working and planning years in advance to remain at the forefront of industry innovation. Through this grouped experience, the Kambi team has found the recipe for delivering on results, and exceeding expectations at every turn.

Kambi's valuation has quadrupled over the last five years, indicating a company and management team that not only delivers to its customers, but to its investors. New York State would serve as another valued stakeholder that Kambi will work tirelessly to deliver for.

Product Expertise

Kambi's years of experience prior to the repeal of PASPA prepared the company for a completely new demographic and set of bettors. While US sport preferences vary quite significantly from Europe and other regions around the globe, Kambi came prepared to offer a market leading product from day one of the US market opening.

Across all major US sports, Kambi has created, fine-tuned, and expanded upon bet offers that not only lead the market but push the industry forward. In this section, we would like to exemplify Kambi's product expertise – a fully developed in-house product that provides end users a first-class betting experience. This premium betting experience resonates with customers, driving turnover for all Kambi operators. This, combined with the efficiency and accuracy of Kambi's models and trading operations, drives market leading revenues for its partners, and the jurisdictions they reside.

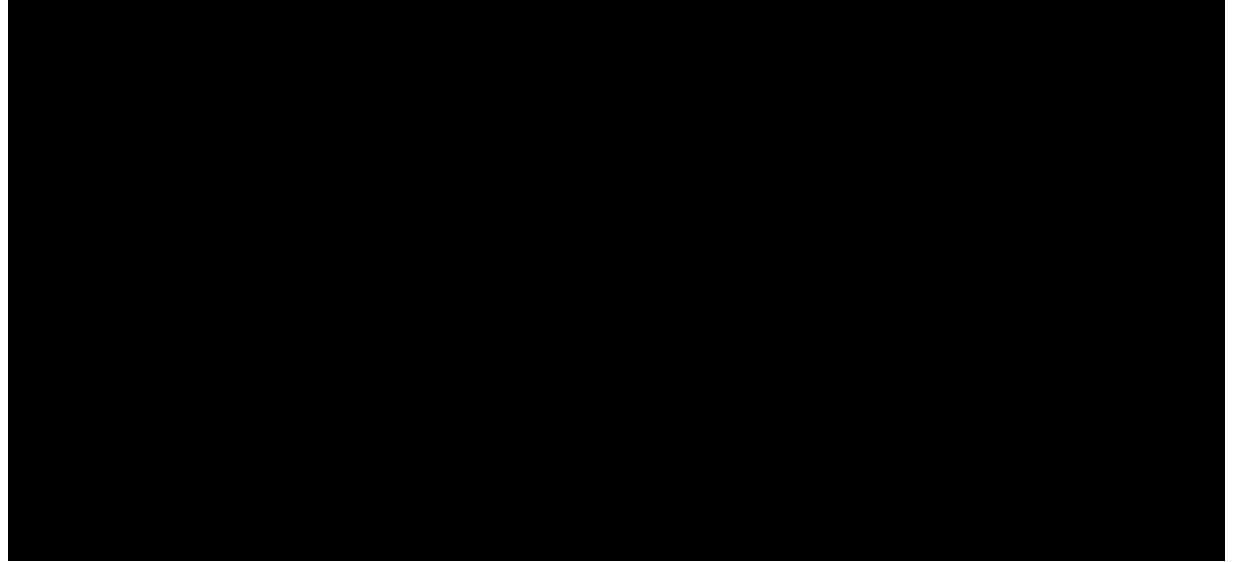





NFL Super Bowl LV (2021)



Above, you can see that this past year's Super Bowl, battled out between the Tampa Bay Buccaneers and the Kansas City Chiefs, was a clear priority for Kambi. Kambi Operators had nearly every imaginable betting offer available to its end users. From on the field, to the result of the coin flip, and even the color of the Gatorade shower in some jurisdictions, Kambi put out the strongest possible offering each of its jurisdictions would allow for.

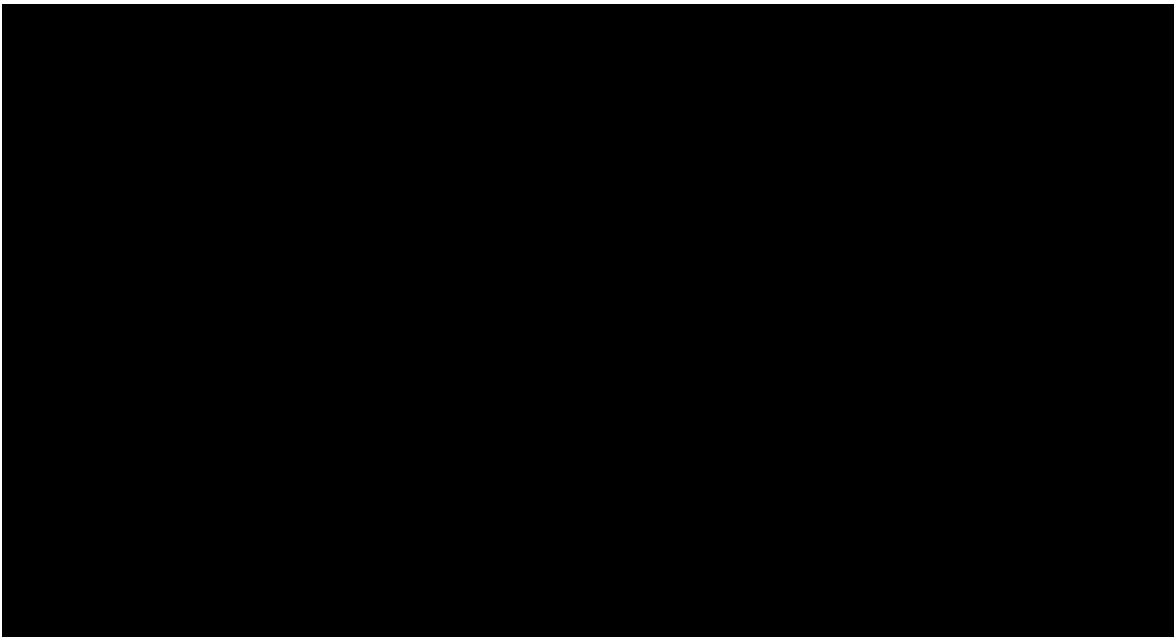


Quantity of offering doesn't tell the whole story. While Kambi had one of the largest offerings, it also provided a chance to display the depth of its in-game product. As you can see, Kambi's instant offering was unique to the market. In a game with such high stakes, where every play matters, this offering catered to the fans who wanted to experience the pressure of each drive.

MLB World Series 2020

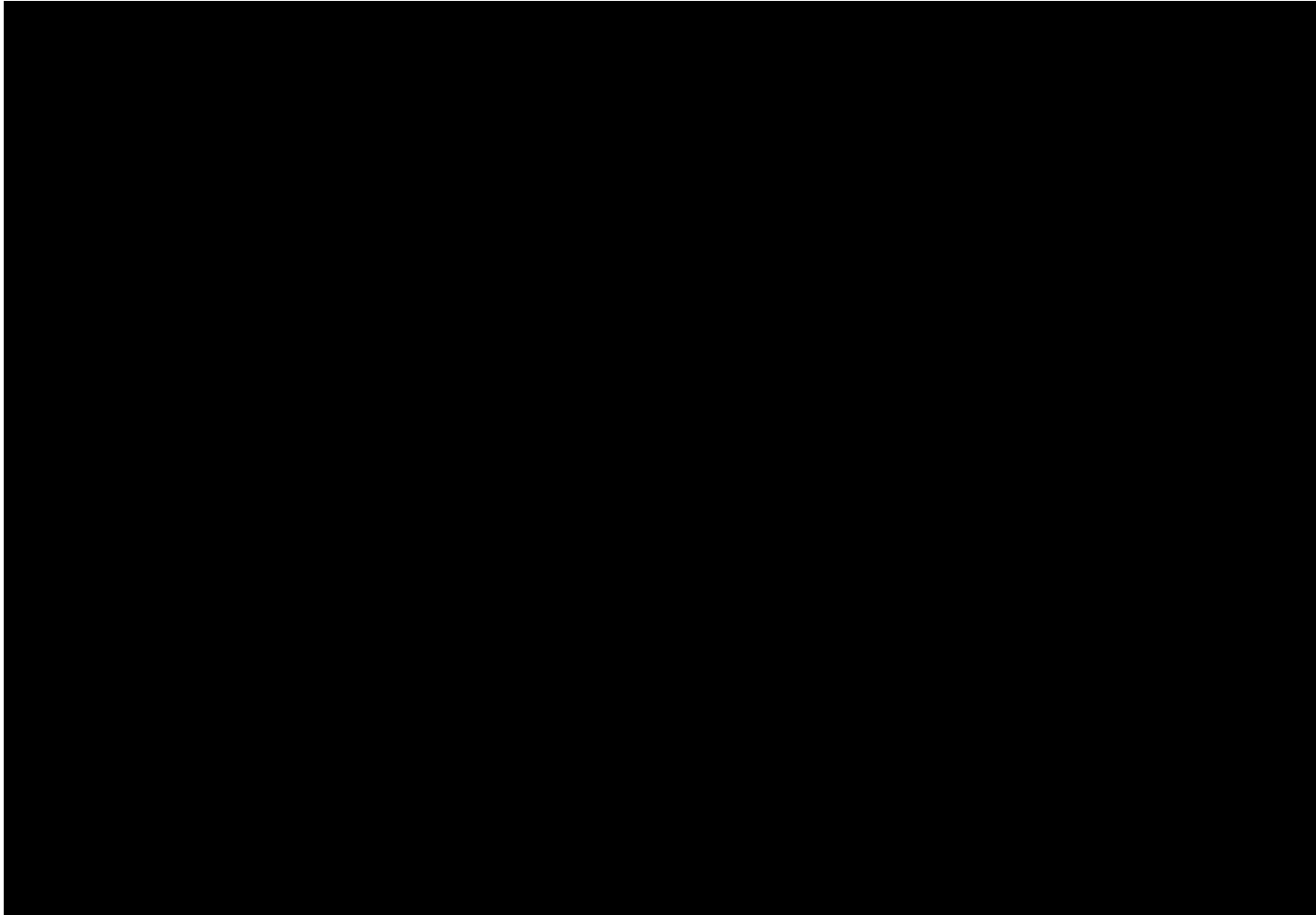
Take another key US sporting event, The MLB World Series. While neither of New York's beloved teams made it in 2020, Kambi can ensure New Yorkers that Kambi's operators are prepared to offer a highly competitive and engaging MLB product.

Upon entrance to the US, further developing a strong MLB product was of the utmost importance to Kambi, knowing the popularity and importance of the sport to US consumers. As you can see here, not only has Kambi developed a highly competitive product, Kambi brings forward the most complex and compelling solution. Only on the Kambi Sports Wagering Platform were US bettors able to truly bet on a pitch-by-pitch, batter-by-batter basis throughout the course of the game (instants).



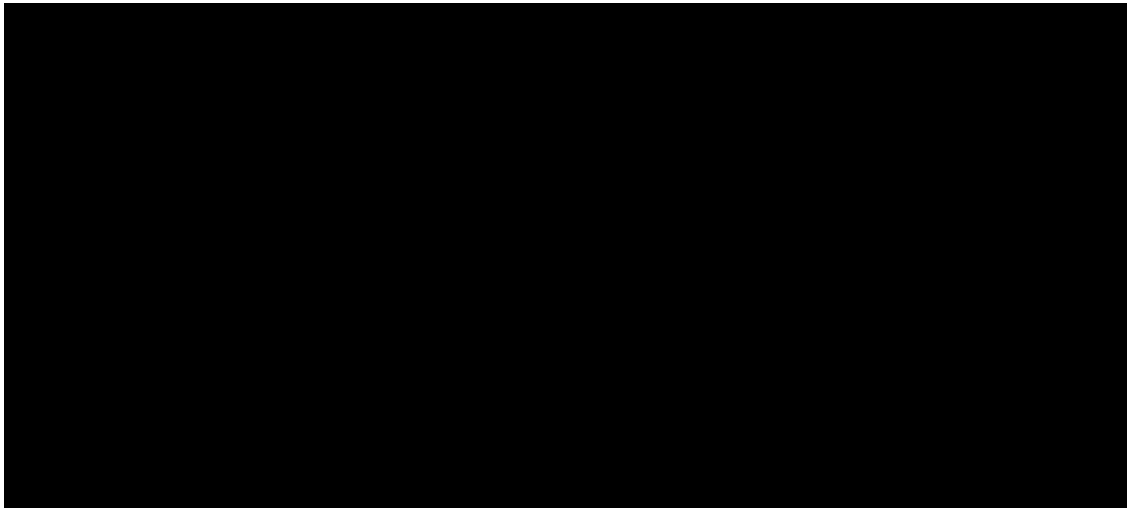
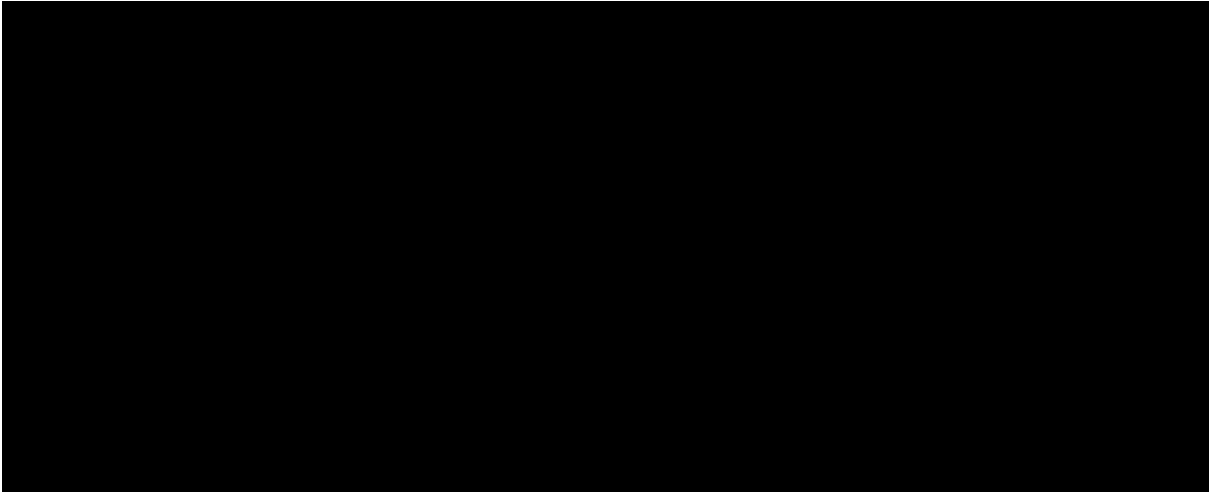
NHL

Observed on March 5, 2021,



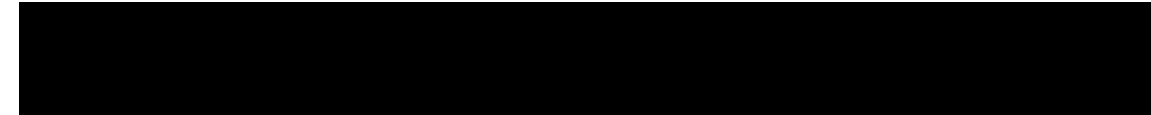
NCAAF – 2021 National Championship

Kambi's expertise also covers college sports,



Suspensions and Availability:

While having a leading offering is important, it does not paint the complete picture of what a quality sports betting product looks like. The in-game wagering experience is one that Kambi has focused on and shows the intricacy of its solution.



[Redacted]

[Redacted]

[Redacted]

NCAAM – March Madness 2021

[Redacted]



Kambi 6.3 INTEGRITY, SUSTAINABILITY AND SAFETY

Kambi is the partner operators trust to provide the technology and services required to deliver a scalable and high-performance Sports Wagering Platform that outperforms the market.

On the surface, there may be little noticeable difference between a good sportsbook and an excellent one. However, providing a first-class sports betting experience, with a uniform standard of high-quality delivery, requires a powerful core able to process high volumes of data and a supply chain capable of delivering on all levels. This begins with the integration of official data partners and proven algorithms that process the data, followed by excellence in trading and risk, which must all be supplied through a fast, stable and intuitive front-end. Only when these elements are working in harmony can an operator begin to deliver a best-in-class service.

Kambi's internal processes create unique datasets generated from thousands of past sporting events, millions of players betting activity and billions of odds. These global datasets are continually growing giving Kambi a unique insight and ability to create innovative and sustainable sports betting enhancements.

Kambi's experience and expertise in compliance enables us to deliver this service to meet the needs of today's highly regulated market, giving our partners security of supply and peace of mind. In addition, our 24/7 sportsbook control team ensures all matters concerning sports integrity are handled proactively and swiftly, protecting our partners, their players, and the sports we love. Product compliance forms an integral part of the Kambi Sports Wagering Platform, it's the foundation on which our product and technology is built and drives how we think about innovation and providing safe and secure sports wagering experiences.

6.3.A – WAGER ACCEPTANCE

Prohibited sports event

As per 5330.8(b) Kambi has robust procedures built into the management of sports events being offered, specifically, Kambi deploys independent offerings (markets) per operator which enable the events/markets/odds to be set up and managed to the specifics of the regulatory list.

Kambi acceptance workflow

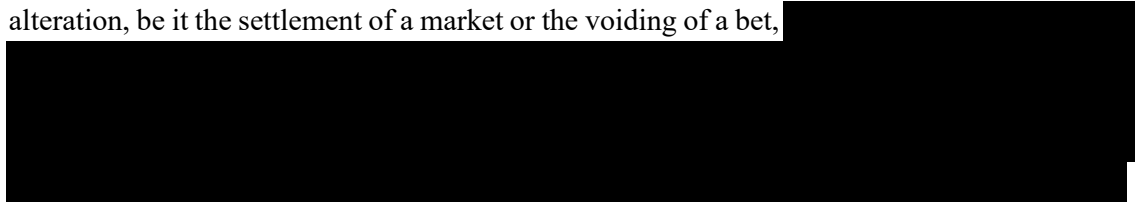
The Kambi systems which make up the wager acceptance workflow are covered within the Kambi GLI-33 Event Wagering System Asset Registry.



Kambi bet settlement workflow

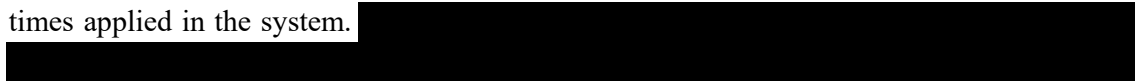
The Kambi platform does not allow an individual bet to be altered in any way aside from its voiding (as per 5330.25 b). This aside, all bets on all bet offers are processed in a uniform manner after acceptance. An individual bet can be voided, as per state rules, but it cannot be made a winner or loser as each betting market must be settled in line with the relevant terms and conditions.

With wagers settled at market level, the payout of individual bets is not possible. For each alteration, be it the settlement of a market or the voiding of a bet,



Past posting

Kambi employs multiple checks and balances to ensure the accuracy of event and bet offer start times applied in the system.



[REDACTED]

[REDACTED]

[REDACTED]

All data sources used in sports wager determination (5330.8(b))

Kambi contracts and integrates with sports data providers to obtain statistical data, both live and historical, and transforms such data into a consumable product by processing it using its systems and personnel.

[REDACTED]

[REDACTED]

[REDACTED]

Submission to laboratory

As per 5330.10(a) prior to conducting mobile sports wagering, all Kambi equipment and software used in conjunction with its operation shall be submitted to a licensed independent gaming test laboratory (GLI) for review and approval.

6.3.B – VERIFICATION OF INFORMATION PROVIDED BY AUTHORIZED SPORTS
BETTORS OPENING A NEW ACCOUNT

[REDACTED]

Fanatics Sportsbook

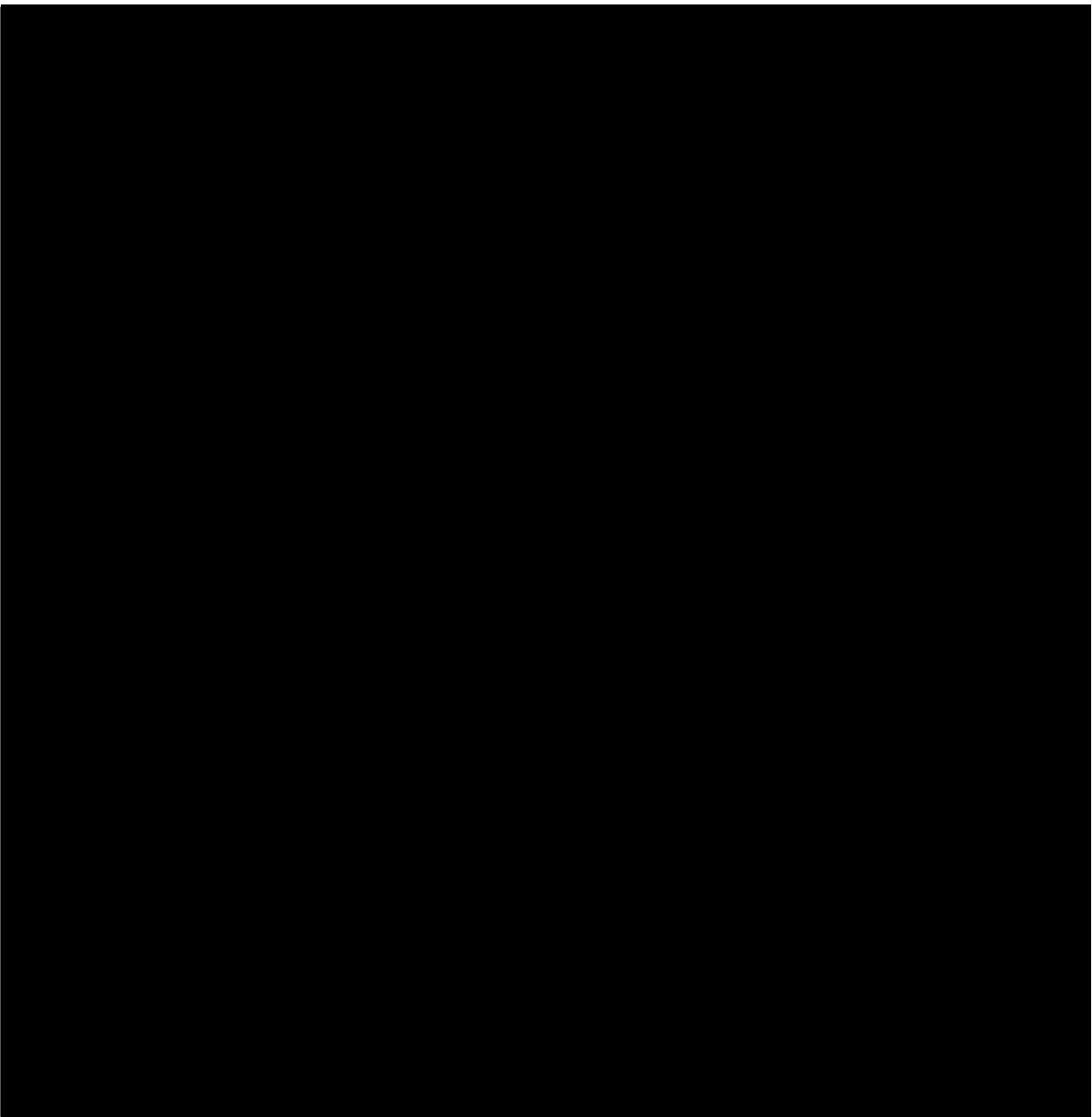
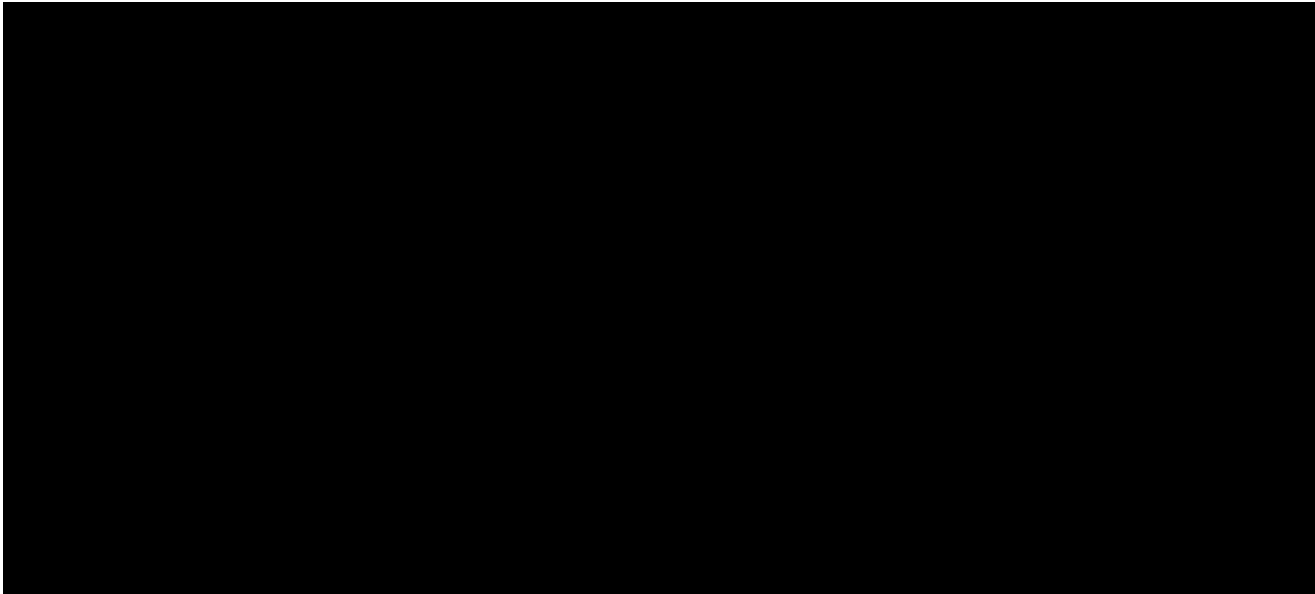
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Barstool Sportsbook

Sports Betting Accounts:

Penn Sports Interactive, LLC (“PSI”), New York State Gaming Commission Mobile Sports Wagering Operator applicant in partnership with Sports Information LTD dba Kambi, Mobile Sports Wager Platform Provider primary applicant, offers sports betting solutions to customers by offering a sports betting account registration through the Barstool Sportsbook website or by downloading its mobile application. PSI has Internal Controls for Account Registration, which includes requiring the following information for each individual person registering for an account: Full legal name, date of birth, last four digits of social security number, physical address, email address, and telephone number. Part of this registrant’s information is checked through a database of public records to confirm the individual’s information and identity. Only upon verifying an identity is an individual allowed to deposit into their sports betting account and wager on the Barstool Sportsbook when physically located in a legally approved jurisdiction. There is no anonymous gaming on the Barstool Sportsbook.

At the same time, the registrant’s name and date of birth is checked against Penn’s database of excluded persons. Any individual excluded across any Penn property (brick and mortar or online) is not allowed to register for the sports betting app pursuant to Penn’s “exclude-one, exclude-all” policy. Penn has a process by which it will ingest all excluded individual’s information through the process outlined by the Commission. Penn Sports Interactive will then disallow these persons from registering for the Barstool Sportsbook. In addition, Penn will block the account of any individual who already has an account if the individual is placed on the exclusion list. The Barstool Sportsbook does a daily scrub of the entire database of players to ensure that no one on any voluntary or involuntary exclusion list is allowed to participate in Sports Betting. The following PSI Internal Controls process is outlined below in more detail.

PSI ACCOUNT REGISTRATION

- a. Penn Sports Interactive, LLC, Mobile Sports Wagering Operator applicant, wholly owned by Penn Interactive Ventures, LLC, (collectively “PSI”), operate its online sports betting system, in conjunction with White Hat Gaming (“WHG”), a licensed Supplier, as the “Barstool Sportsbook.”
- b. To establish a sports betting account, a player navigates to the Barstool Sportsbook website or downloads its mobile application and selects “Register”. A series of prompts requires the player to provide:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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SPORTS BETTING ACCOUNT FUNDING

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SPORTS BETTING ACCOUNT WITHDRAWALS

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ONLINE SPORTS BETTING SUSPENDED ACCOUNTS

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ACCOUNT CLOSURE

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[REDACTED]

DORMANT ACCOUNTS

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[REDACTED]

[REDACTED]

[REDACTED]

PATRON COMPLAINTS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6.3.C – SYSTEMS USED FOR MONITORING STRUCTURED WAGERS AND UNUSUAL OR SUSPICIOUS WAGERING ACTIVITY

As per the regulation 5330.27, Kambi’s Trading & Risk team use multiple internal systems to monitor wagers and identify unusual wagering activity. [REDACTED]

[REDACTED] A description of the system as per 5330.8(e) can be found below.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6.3.D – THE SYSTEMS USED TO ENSURE THAT AUTHORIZED SPORTS BETTORS ARE PHYSICALLY LOCATED WITHIN THE STATE OF NEW YORK WHILE PLACING A WAGER

[REDACTED]

[REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

Barstool Sportsbook

PSI integrates GeoComply® geolocation compliance technology to ensure that authorized sports bettors are physically located within the state of New York while placing a wager. GeoComply® monitors a player's location and blocks unauthorized attempts to access the

sports wagering system throughout the duration of the gaming session. Outlined below are the necessary steps taken to ensure wagering within the state of New York.

- a. PSI integrates GeoComply® geolocation compliance technology. GeoComply® triangulates a registered player's location via detection of IP sources, GPS location (mobile devices), WiFi connection(s), and IP addresses. This allows levels of accuracy of +/- 25 meters, pinpointing users to a house level, and comprehensively stopping spoofing via 350+ checks per transaction. Multiple databases and failover systems maximize pass rates to achieve 98% or more. A registered player's location is verified as frequently as specified in the Commission's technical standards. A failed geolocation attempt results in real-time denial of an attempted wager. A failed geolocation attempt automatically signals the White Hat System to display a message informing a registered player that they are not within an authorized location.
- b. GeoComply® dynamically monitors a player's location and blocks unauthorized attempts to access the sports wagering system session throughout the duration of a gaming session. The physical location of a registered player is verified prior to their first wager attempt and then thereafter in accordance with the Commission's technical standards relative to proximity to state borders and unauthorized areas (e.g. licensed facilities).
- c. GeoComply® is equipped with geo-fencing technology to prevent registered players from engaging in online sports wagering outside the New York State unless the conduct of gaming is not inconsistent with Federal law, law of the jurisdiction (including any foreign nation in which the participating player is located), or the gaming activity is conducted pursuant to a reciprocal agreement to which the State is a party that is not inconsistent with Federal law.
- d. GeoComply® will detect if the user is utilizing location tampering software and immediately block the account from the ability to place a wager. A notification will be displayed to the player that GPS tampering software was identified.
- e. GeoComply® maintains a log and record of player geolocation checks and the applicable locations of each check, which are available to PSI & the Commission upon request.

6.3.E – TECHNOLOGY TO ENSURE ANY WAGER IS ACCEPTED THROUGH EQUIPMENT PHYSICALLY LOCATED AT A LICENSED GAMING FACILITY IN THE STATE

Kambi will locate the following software components on equipment managed by Kambi in a licensed gaming facility:

[REDACTED]

These applications ensure that any wagering transaction is received ([REDACTED]) and accepted ([REDACTED]) on the servers physically located at the licensed gaming facility. If any of these components is unavailable at the licensed gaming facility, the platform will not accept any wagers.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



6.3.F – DESCRIPTION AND LOCATION OF REDUNDANT SERVERS, IF ANY

Kambi

Redundancy

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Kambi Recovery Plan

Kambi's backup and recovery plan is set out in the Kambi Fault Tolerance Back-Up and Disaster Recover Measures document which is a component of the Kambi ISO27001 / WLA-SCS certified ISMS.

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

6.3.G – SECURITY OF SERVERS, APPLICATIONS, AND COMMUNICATION NETWORKS; AND PATRON PERSONAL AND WAGERING INFORMATION

Kambi:

Certification

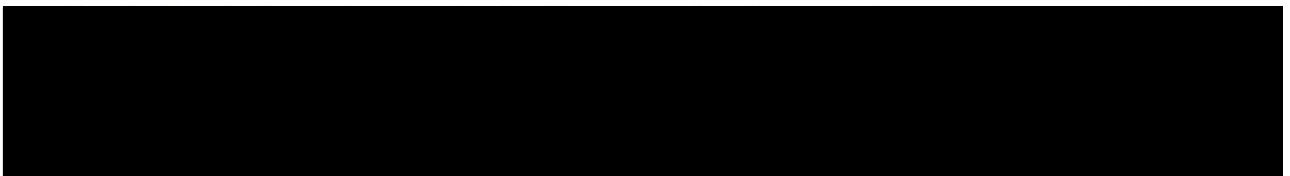
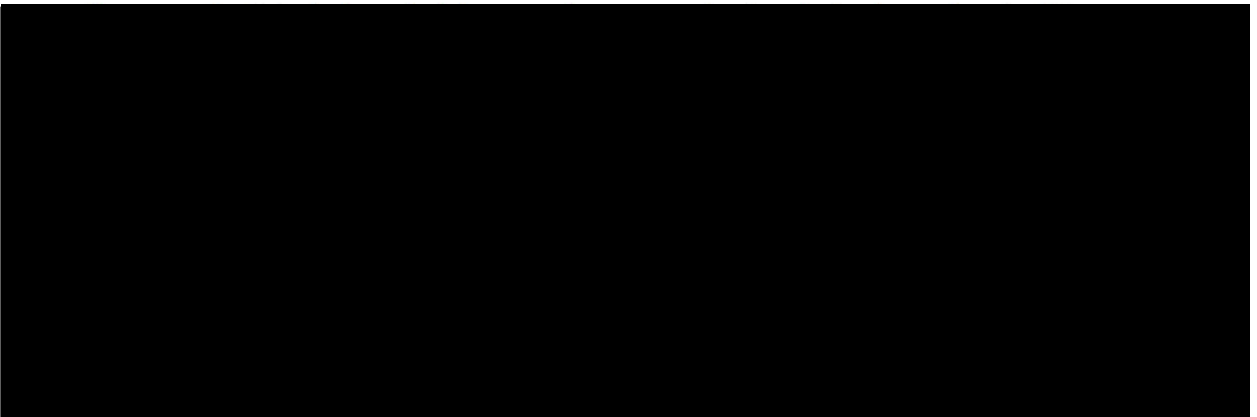
Kambi has been awarded the ISO 27001:2013 and WLA-SCS:2016 certifications, these require Kambi to assess and continuously evaluate information security risks and identify potential weaknesses and to put in place controls that are proportionate to the risk.

The certifications provide a robust framework, which helps Kambi to manage regulatory and legal requirements.

In accordance with §5329.32 and prior to commencing operations and annually thereafter, Kambi will procure the performance of a system integrity and security assessment by an independent professional for submission to the commission in compliance with this section.

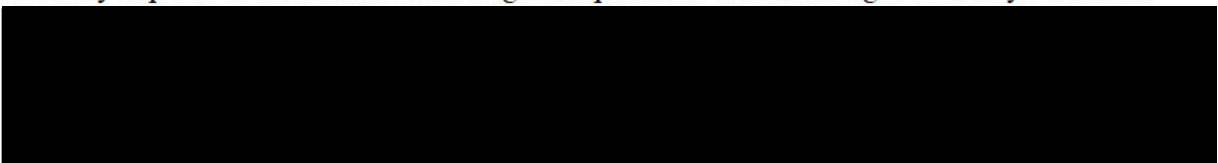
Kambi is currently subject to and compliant with similar requirements in multiple US jurisdictions.

Security design principles



Logical Security

Kambi has an internal security operations group that handles infrastructure and software security aspects of the service including both proactive and handling of security incidents.



[REDACTED]

[REDACTED]

Physical Security

Depending on office location and activity in the office, the office is either protected with

[REDACTED]

Employment and contractor background checks

At least two references are taken using our general references template together with specific questions. Kambi always takes up personal references, checks criminal records and carries out any other background checks that are necessary, including a credit check.

Contractor Checks

A safe and secure working environment is fundamental to Kambi's business success and we seek to protect our personnel, physical assets, information, company and customers' reputation from harm.

[REDACTED]

[REDACTED]

[REDACTED]

Internal auditing processes

The following activities are deemed necessary to achieve our security objectives and to meet the risk assessment criteria for the risks identified in Kambi:

[REDACTED]

[Redacted]

The internal audit is risk driven and includes areas not included in the regulatory audits. [Redacted]

[Redacted]

Third-party communications

As per 5330.10(e) [Redacted]

As per 5330.8(b) Kambi provides secure methods to access the sports wagering platform, [Redacted]

In addition, all intrusion detection systems within the Kambi environment are monitored on a 24/7 basis [Redacted]

Security is tested internally [Redacted]

[Redacted]

Remote access to the sports wagering platform

Kambi manages all aspects of the sportsbook service in-house. Kambi maintains an ISO27001 / WLA/SCS certified ISMS containing a comprehensive set of information security policies and procedures.

[Redacted]

[Redacted]

Fanatics Sportsbook

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

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Barstool Sportsbook

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[REDACTED]

[REDACTED]

was accepted. Outside the transaction flow, all other data provided to and from the

[REDACTED]

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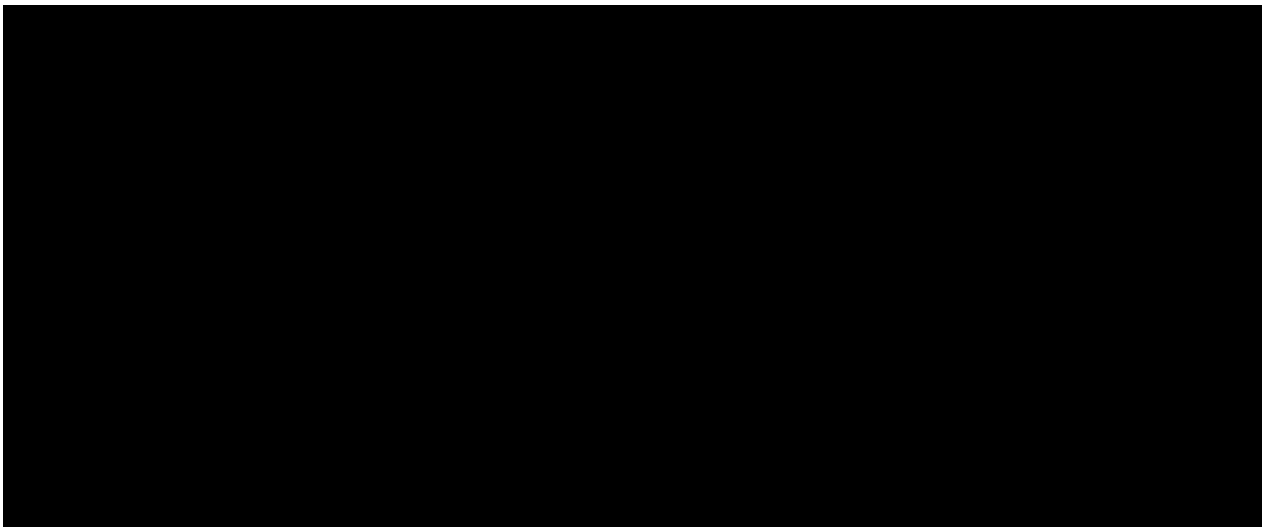
6.3.H – INTEGRITY MONITORING AND REPORTING, INCLUDING ANY CURRENT AFFILIATIONS RELATED TO INTEGRITY MONITORING

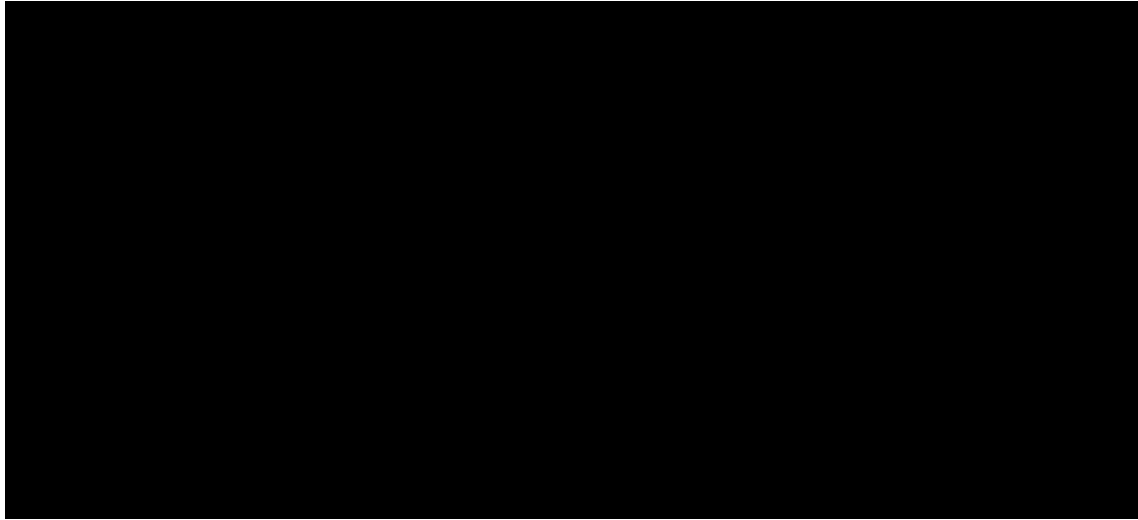
Prohibited sports events

Kambi sportsbook controls, including blocks at the athlete and competition level, will be implemented to prohibit the offering of wagers on prohibited events and teams decided for New York State. Kambi has extensive experience in this department and an impeccable track record, including in New York where on-property regulations stipulate no wagering on New York collegiate teams, nor on collegiate-level events taking place within the New York State border.

Kambi's anti-match fixing, and fraud strategy and procedures are enacted by its dedicated Sportsbook Control team. The department comprises a growing number of employees (currently 14) which processes all internal and external information relating to fraud in order to guarantee the security of sensitive information around the clock.

The primary aim of Kambi's match-fixing strategy is prevention; the goal is to minimize the number of potentially fixed events offered on both Kambi's own and its partners' platforms.





Technical Compliance

Each potential Kambi operator in NY can be reassured that Kambi's 24/7 Technical and Product Compliance team in Philadelphia work tirelessly to ensure the Kambi sportsbook is fully compliant with the regulations of the states of our customers. The Operational Regulatory Compliance and Sportsbook Control teams are in constant communication with both regulators and Kambi operators, to ensure the fullest possible offering, while remaining compliant with state-by-state regulations.



| Sport | Configuration | Governing Body | Moneyline / Win Bet | Point Spread | Over / Under | Head to Head | Futures | Team Props | Player Props |
|-------------------|---------------|----------------|---------------------|--------------|--------------|--------------|---------|------------|--------------|
| American Football | | | | | | | | | |
| American Football | | | | | | | | | |
| American Football | | | | | | | | | |
| American Football | | | | | | | | | |
| American Football | | | | | | | | | |
| American Football | | | | | | | | | |

Licensure

To provide betting services, Kambi itself holds licenses with gaming regulators across the world, with fraud reporting a licensing requirement. Kambi’s 24/7 Sportsbook Control team escalates instances of potential fraud encountered on the platform to operators, integrity monitoring providers and state regulators as required. In the case of the UK Gambling Commission’s Sports Betting Intelligence Unit, Kambi proactively provides event-level information for all instances of potential match fixing. Kambi also has information-sharing MoUs with various sports governing bodies and their associated integrity units. Events administered overseen by FIFA, the International Olympic Committee and the Esports Integrity Coalition are escalated should fraud be uncovered. Within the betting industry, we also escalate and receive match fixing information to and from the International Betting Integrity Association (IBIA) on behalf of the affiliated operators, where we were the first Sports Wagering Platform provider to become a member. The advantages of the Kambi network, coupled with the focus of its Sportsbook Control team, has seen Kambi become a key contributor to the IBIA, ensuring instances of suspicious betting activity are handled correctly and risk swiftly reduced. For example, in 2020, Kambi was the first to report potential sporting manipulation to the IBIA in more than 50% of cases that went on to investigation. This highlights the important role Kambi would play in safeguarding players, operators, and revenue in New York State. Kambi has proven this to be the case in other US jurisdictions, forming strong relationships with state regulators to combat corruption and protect the integrity of

sports. Kambi also supports US-based operators in fulfilling their integrity reporting responsibilities with both state regulators and SWIMA.



As well as flagging individual cases of match fixing, Kambi is also at the vanguard of the betting industry’s response to the issue in general, contributing expertise in the field where and whenever we believe it can make a difference. We have contributed to initiatives run by the Council of Europe, as well as assisting and advising various regulatory bodies, academic research projects and sport’s governing body reviews about best practice in the integrity field.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

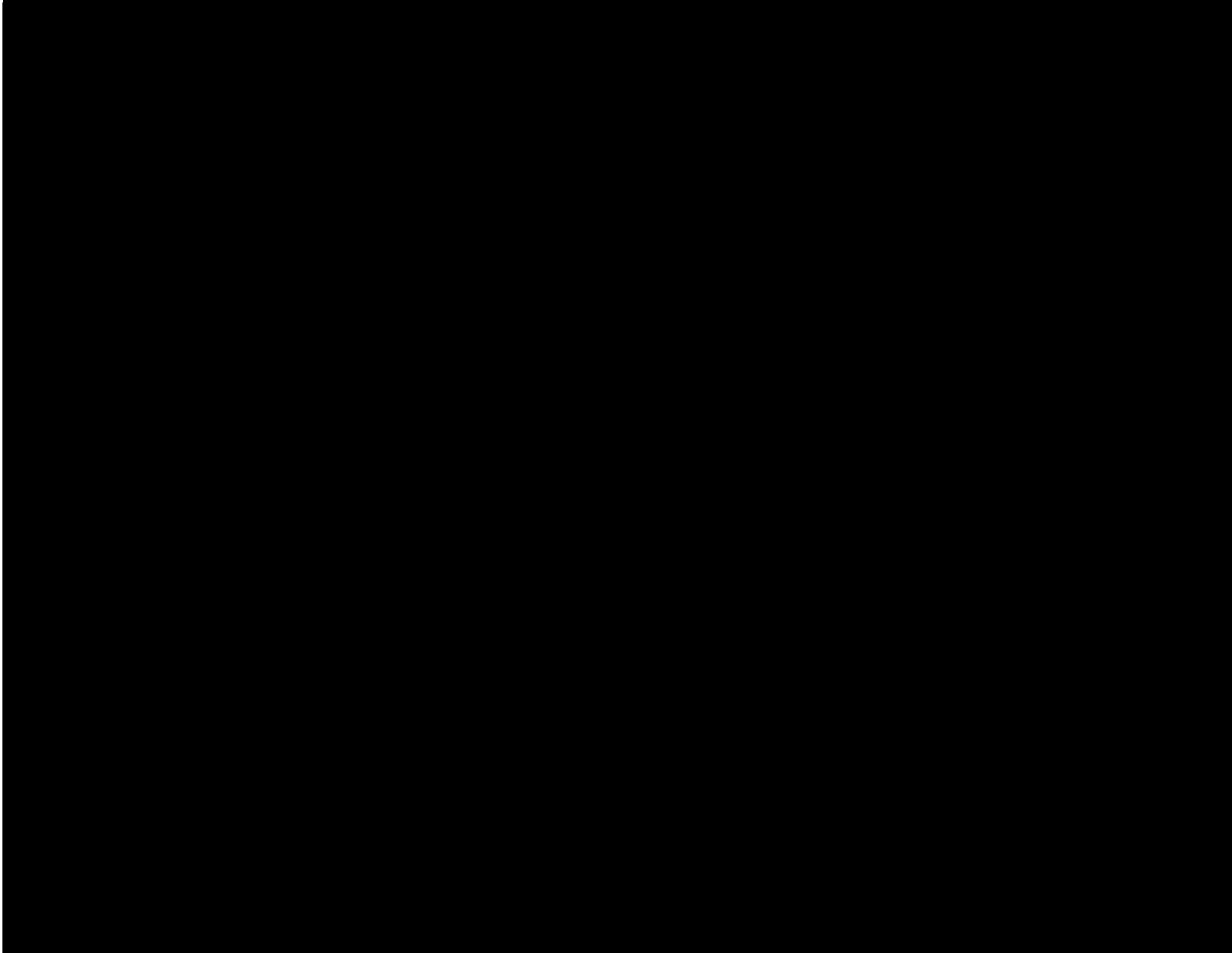
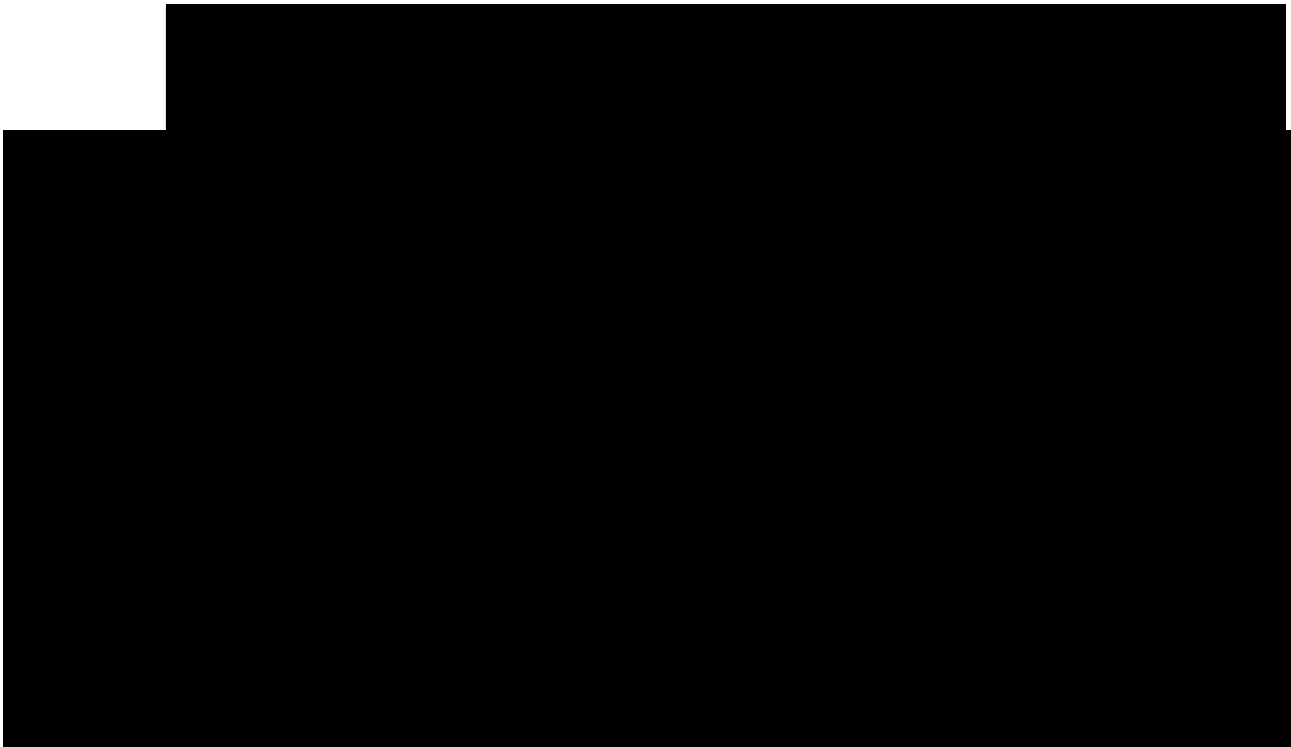
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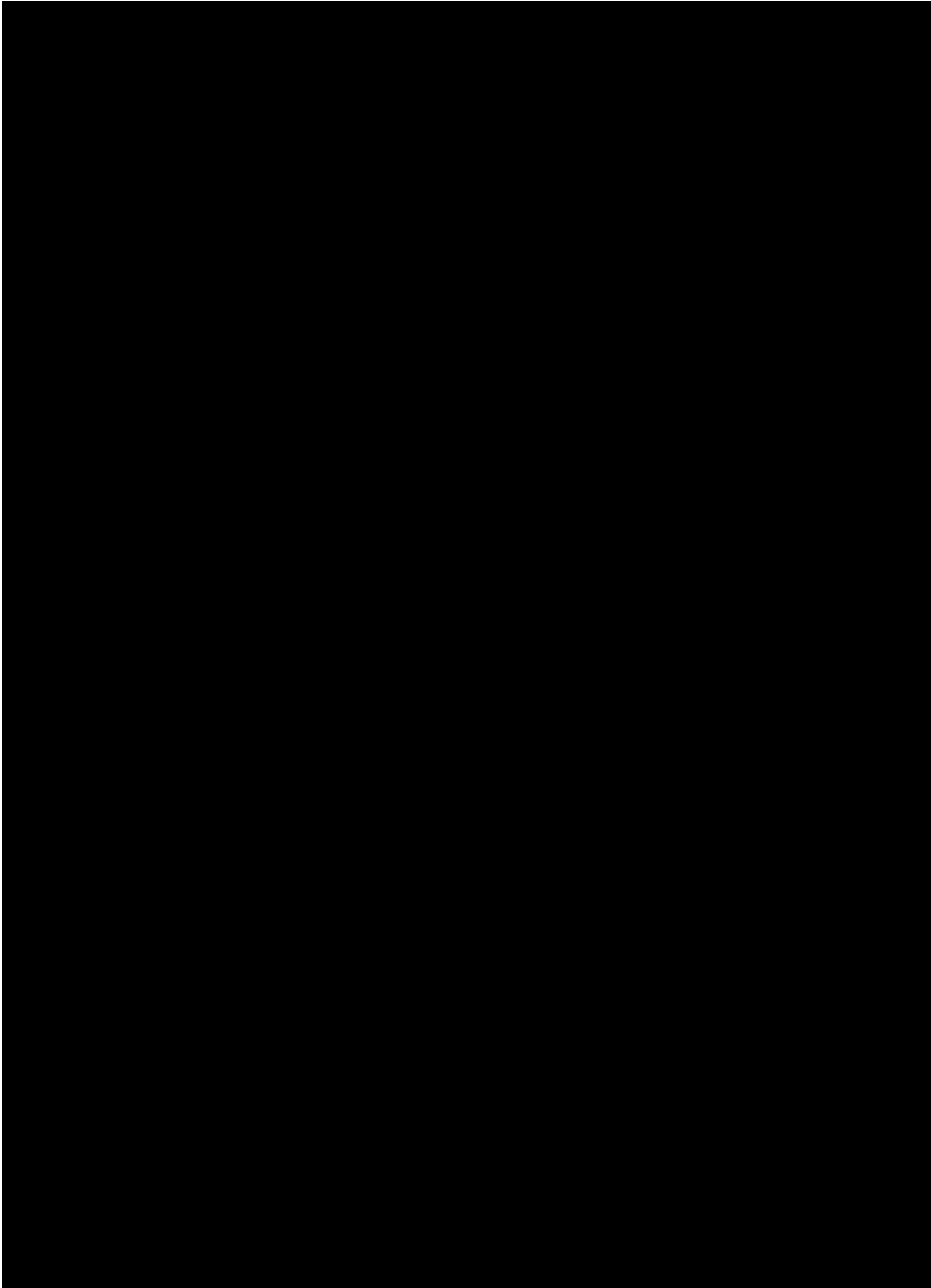
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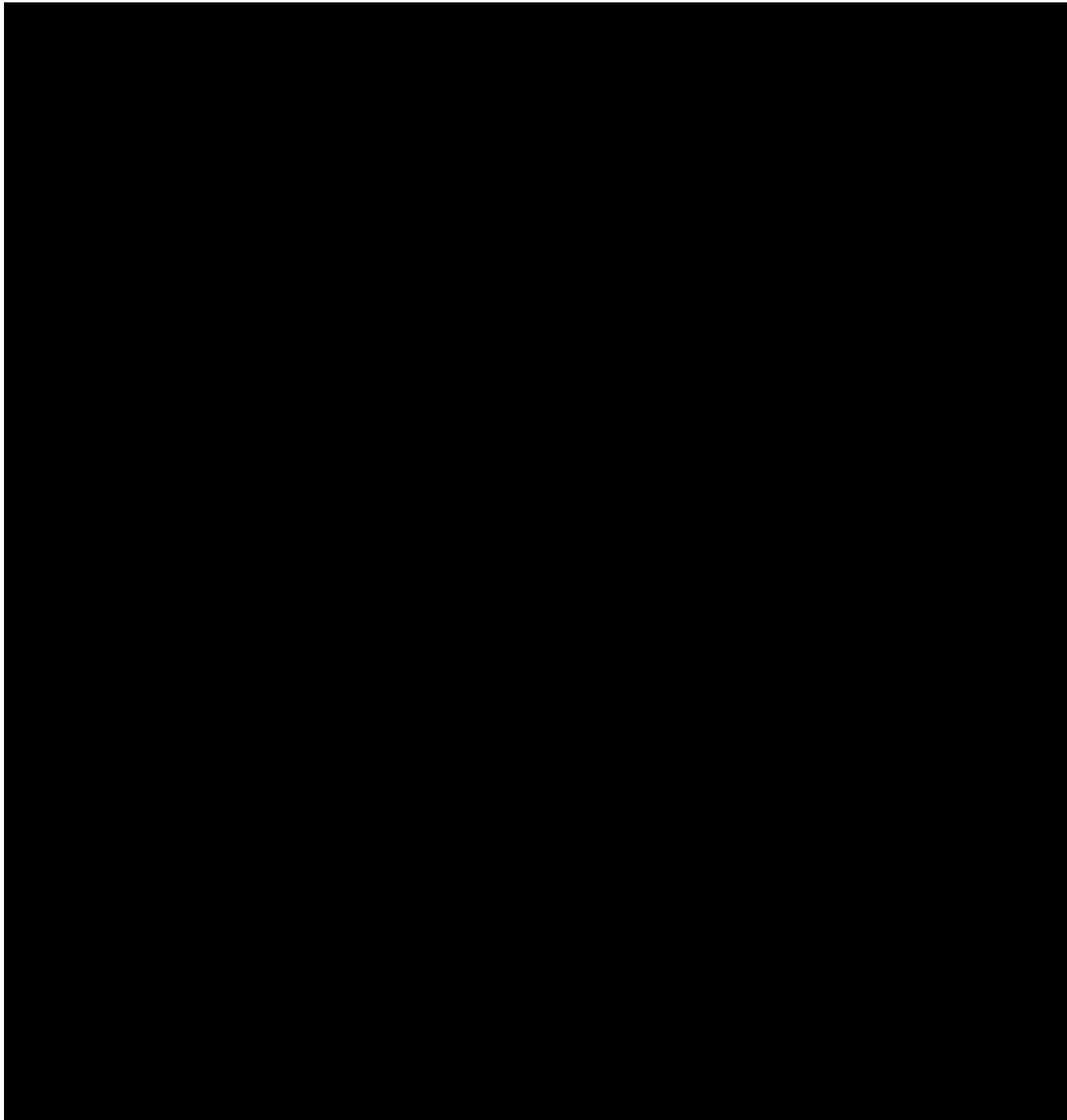
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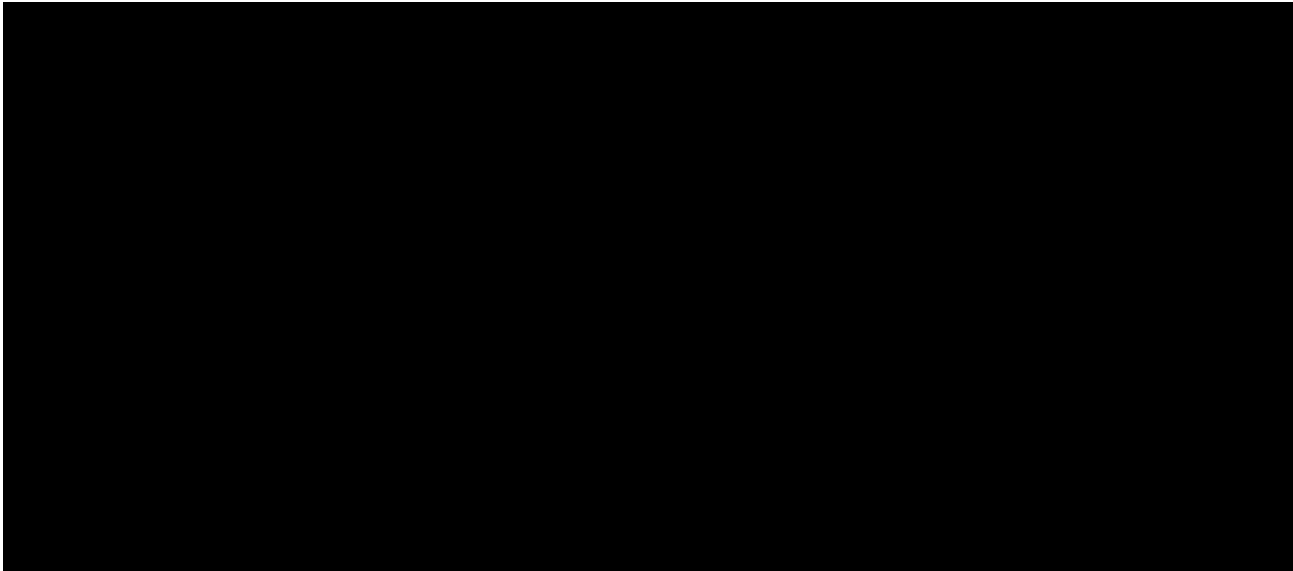
[REDACTED]

[REDACTED]









6.3.I RESPONSIBLE GAMING

Kambi Responsible Gaming

Kambi is fully committed to responsible gaming and the protection of end users. We understand that sports betting is at its most exciting when users can play in a safe and enjoyable environment – betting only with funds they can afford to lose. We know that it is healthier to have players gambling responsibly over the long- term, than wagering irresponsibly for a short period.

Correctly, the issue of responsible gambling is high on the agenda of regulators in many territories, with some handing out significant fines to operators who fail to meet increased compliance demands.

In 2018, regulators’ increased focus on responsible gambling led to thorough reviews of several Kambi operator partners’ responsible gambling procedures and protocols. Following these reviews, Kambi’s responsible gambling measures, as employed by our operators, were not found to be of any concern. As US states began to regulate, or consider the regulation of gambling, Kambi presented to delegates at the National Council of Legislators from Gaming States’ biannual conference. Here we discussed problem gambling initiatives and made recommendations based on learnings from our years of experience in addressing this issue.

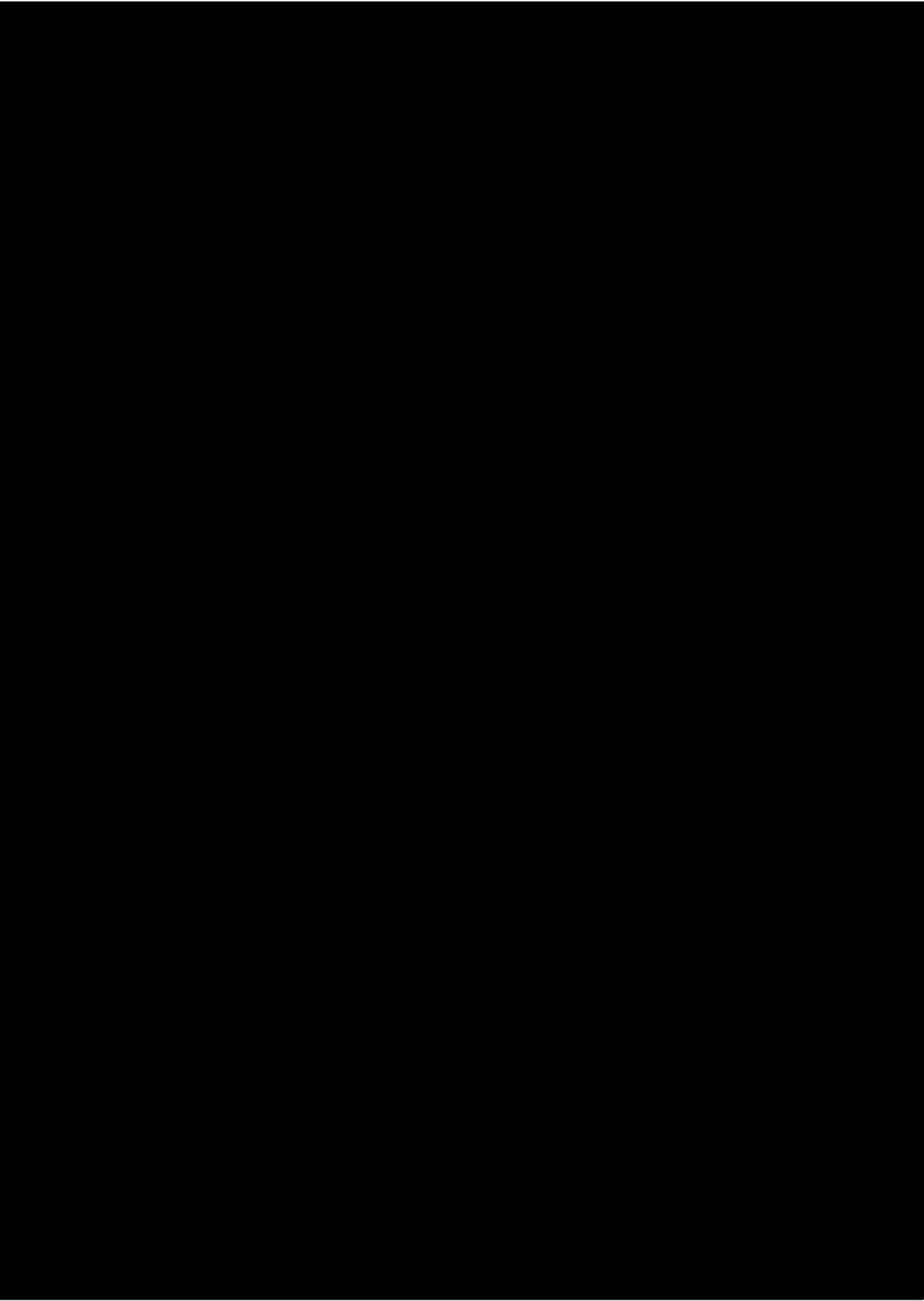
Throughout the operator partnership, Kambi supports via the provision of reporting tools, functionality, and decades of know-how, however it is the ultimate responsibility of the operator to ensure that its players are betting in a manner deemed responsible and in line with its gaming values.

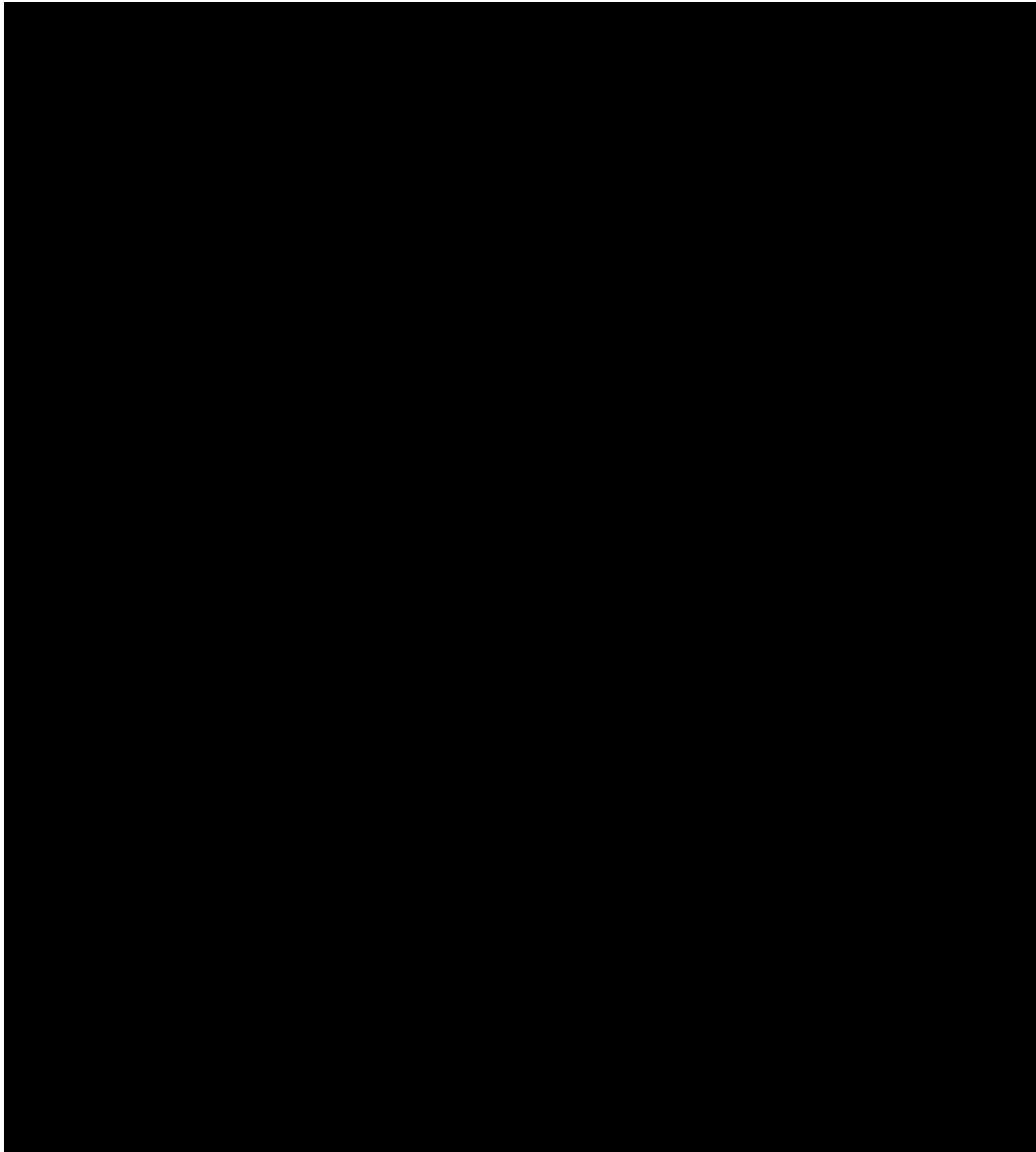
Fanatics Sportsbook

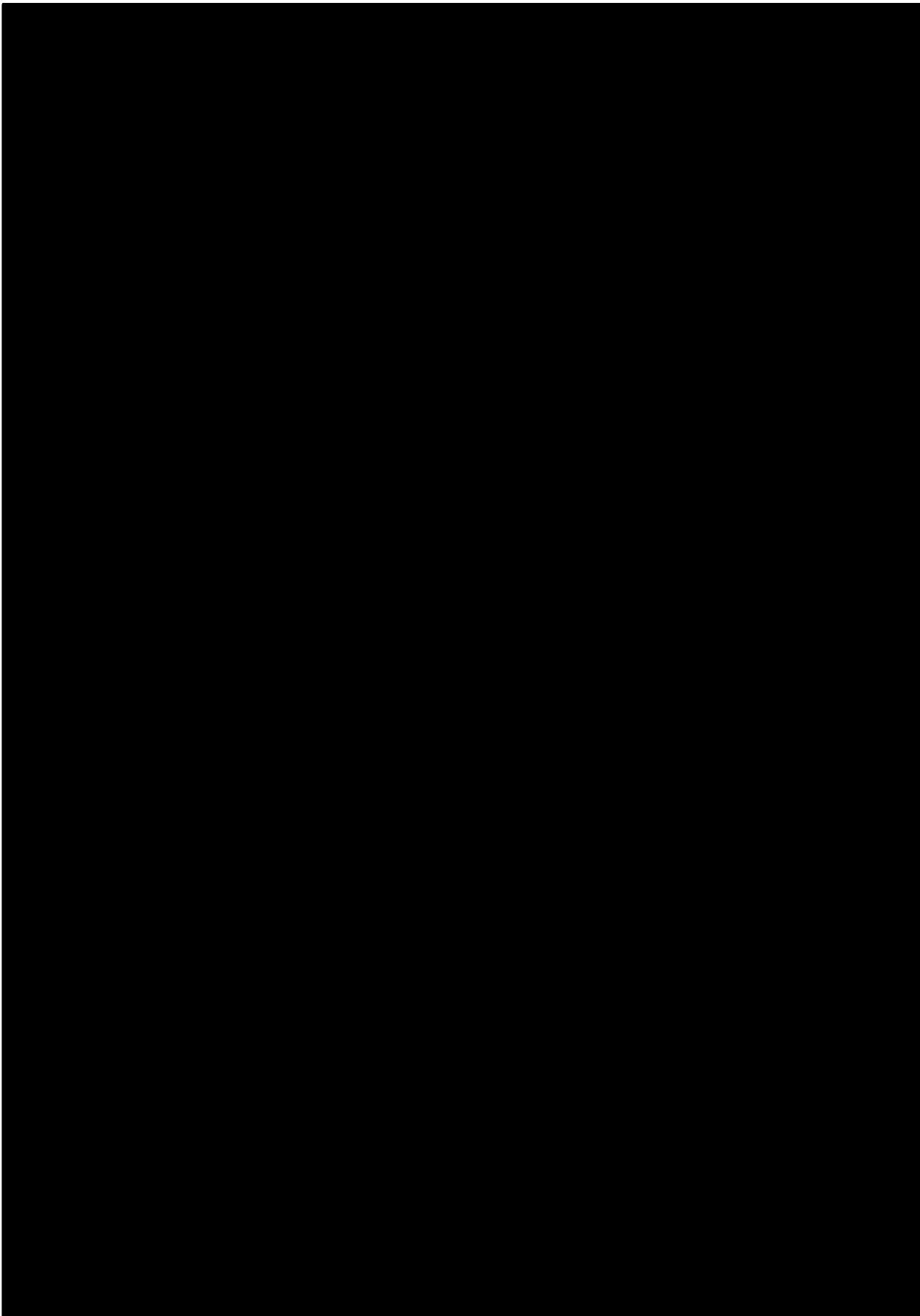
Fanatics has an engaged and passionate customer base, but recognizes that for some, sports betting can become a problem with devastating consequences for the player, their families, and their friends. Fanatics Sportsbook will actively promote responsible gaming in New York, and actively offers tools, education, and limits to players on its platform in an effort to support their ability to gamble responsibly – or choose not to gamble at all.

The Fanatics Sportsbook platform will empower customers by providing them with details on their wagering and financial activities and the options to limit their time, deposits, or wagers on the platform. Further, along with its partners, Fanatics Sportsbook takes seriously its responsibility to prevent direct advertising, prohibit access, and offer resources to individuals who may have a gambling problem. Additionally, Fanatics provides all jurisdiction-specific responsible gaming messaging in a clear and accessible manner in advertisements and communications as well as on the platform.

The Fanatics Sportsbook platform is specifically designed to appeal to adults who are 21 or older. Moreover, all employees and affiliates of Fanatics Sportsbook understand that underage gambling is not acceptable under any circumstances.







Barstool Sportsbook

PSI, a subsidiary of Penn National Gaming, Inc. (“PNGI”) is committed to promoting a culture of responsible gaming. PNGI’s Responsible Gaming Committee oversees its responsible gaming programs and regularly consults with the International Center for Responsible Gaming (ICRG) to establish responsible gaming goals which include,

- Establishing responsible gaming related policies and procedures including programs designed to allow patrons to self-exclude and set up financial restrictions and marketing restrictions.
- Employee training, preventing underage gambling
- Advertising responsibly.
- Supporting and promoting research-based policies on responsible gaming.
- Ongoing oversight and review of compliance with all responsible gaming policies and programs.
- Internal Controls for Player Account Registration (Please refer to PSI’s Internal Controls Section 4- Online Sports Betting Accounts)

PSI provides a number of resources and literature to players in its “Responsible Gaming and Patron Protection” and “Limits” section on the mobile application. Players have the opportunity to set various monetary limits in an effort to stay within their budget. Our online offerings further provide the operation of setting time limits, which prevent players from logging into their account for 24 hours after the voluntarily set time limit is met. In addition, players can set a “check in” alert that will notify a player when they have been active on the app for a certain amount of time. To further promote responsible gaming,

there are waiting periods of 24 hours, seven days, and one month to increase or remove limits, aimed at preventing a vulnerable player from changing responsible gaming settings impulsively. In addition, players can set a timeout of at least 72 hours where they will not be able to login during this cooling off period.

Consistent with PNGI's omni-channel approach, Penn National Gaming, Inc. and Barstool Sports, Inc. are creating a cohesive, consistent message regarding responsible gaming across its interactive products, including the Barstool Sportsbook and Casino. Penn National Gaming and Barstool Sports launched Barstool Sportsbook responsible gaming platforms on Twitter and Instagram, providing dedicated platforms with the sole goal of delivering meaningful responsible gaming messaging under the Barstool brand. Penn National and Barstool Sports incorporate the traditional, industry standard responsible gaming message in its gaming content, focusing on the 1-800-GAMBLER hotline number to provide its audience with the industry leading, easily recalled, and nationally available avenue of support if in need. Penn National Gaming and Barstool Sports are improving the way we talk about responsible gaming to engage our entire audience in a meaningful way and will continue to focus on the wellbeing of our customers.

[REDACTED]

- [REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]



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.

Speed to launch

Kambi has consistently proven that it leads the industry in terms of speed to market and integration excellence, which will be no different for mobile in New York, especially as the operators are already integrated into Kambi's platform. Kambi was the first to market in 10 US states, including New York for retail, and holds the intention and hope to do the same with New York online wagering.

Kambi is working on the assumption that the Commission will award licenses in December 2021 or earlier. For Kambi, a typical live launch for mobile takes approximately 6-8 weeks, meaning we will be able to support a successful launch ahead of Super Bowl LV.

Delivery excellence

We are proud of our 100% on-time delivery of past integration deliverables and work very actively through support, top class documentation and relevant, stable functionality and interfaces to reduce the risk of delays.

Our mobile delivery record in the US includes:

- First operator live in NJ (DraftKings, August 2018)
- First operator live in PA (Rush Street Interactive, May 2019)
- First operators live in IA (DraftKings and Rush Street Interactive, October 2019)
- First operator live in NH (DraftKings, December 2019)
- First operators live in CO (DraftKings and Rush Street Interactive, May 2020)
- First operator live with retail in NY (Rush Street Interactive, July 2019)

11 years of experience

Kambi supplied sports betting technology into regulated markets a full eight years prior to the repeal of PASPA in 2018. These eight years of improving our trading models, staffing and technical infrastructure give us a significant advantage over many other New York Platform Applicants, who will lack this experience.

Roadmap dedicated to sports betting

As a dedicated sports betting platform, Kambi's product roadmap is not encumbered by demands relating to other products such as iCasino and Poker. Our operators can integrate these product verticals from relevant suppliers if they so wish, whilst Kambi continues to obsessively develop and improve the sports betting experience. The benefit for the Commission in selecting Kambi therefore is the reassurance and pedigree that comes from a dedicated platform – one that also has a faultless track record when it comes to corporate probity.

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.

Indicative Launch Plan

The full project plan for New York will have all phases adjusted and updated in line with the development of regulations in the state. The project plan will be shared with the Commission at the earliest possible opportunity following selection.

Kambi has an expansive Delivery Team to ensure that all launches are successfully planned and executed, even where there is uncertainty about regulation.

The mobile delivery in New York is the top priority of our business and Kambi will fully leverage its abundance of resources around the globe to ensure a smooth and rapid implementation of mobile sports betting.

The following is a high-level overview, referencing the current RFA process:

[REDACTED]

- [REDACTED]

[REDACTED]

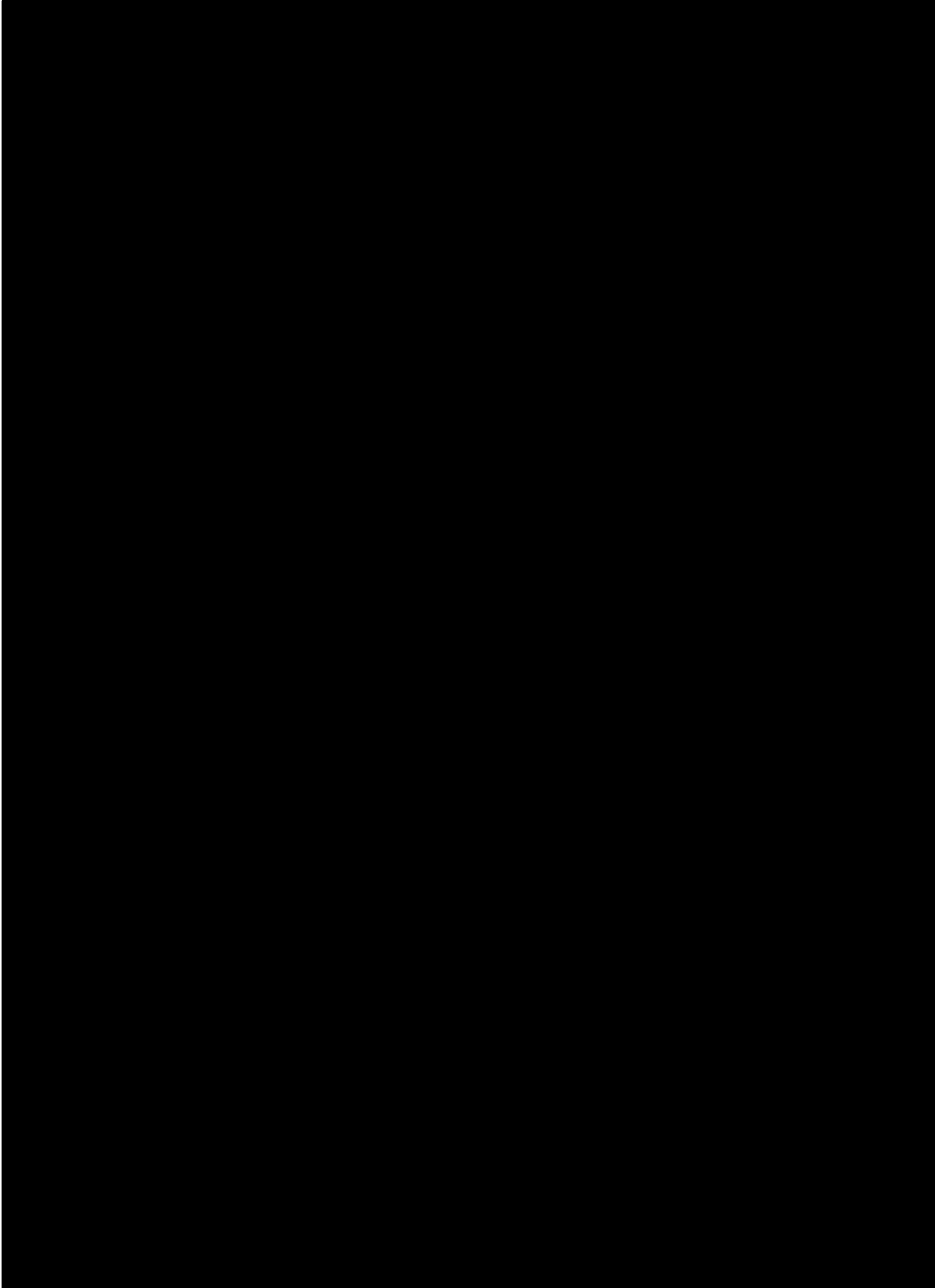
- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]



A - Organization's policy on workforce diversity

Kambi Workforce Diversity

Background

Kambi is a global Sports Wagering Platform supplier, with eight offices in seven locations around the world, providing a 24/7/365 service to our partners and their players. This global presence ensures Kambi and its partners benefit from the diversity of its workforce, which is made up of more than 30 nationalities. To protect this diversity, with its mix of racial and ethnic backgrounds, Kambi hires locally where possible, simultaneously providing good jobs for local communities. An example of this is our office in Manila, which represents approximately 30% of our global workforce and is made up of 98% Filipino nationals. In taking this approach, Kambi has successfully built an organization on the foundations of diversity and mixed cultures that, when combined, deliver the wide spectrum of thoughts and ideas that power our performance and innovation.

Kambi is committed to equality of opportunity in all aspects of employment including recruitment, training and benefits whatever the gender, marital status, gender reassignment status, disability, race, national origin, ethnic origin, color, nationality, sexual orientation, religion, belief or age of an employee, considering only the individual's aptitudes and abilities and the requirements of the job.

Kambi also complies with all applicable national and international laws within human and labor rights included but not limited to minimum age, minimum salary, union rights and forced labor as well as United Nation's Universal Declaration of Human Rights, The International Labor Organization's Declaration on Fundamental Principles and Rights at Work, The Rio Declaration on Environment and Development, and The United Nations Convention Against Corruption declaration on human rights.

This policy must be strictly adhered to by all employees.

Discrimination, abuse, or failure to observe the Equal Opportunities Policy and practice will result in disciplinary action being taken, including summary dismissal in serious cases. If you believe that you are not being accorded equal treatment, you should raise the matter immediately with your manager or make use of the company's grievance procedure.

The purpose of this policy is to explain the company's view on equal opportunities and how to ensure this is followed.

The policy takes effect on 1st January 2014 and covers all employees in the Kambi Group. Kambi reserves the right to revise or terminate this policy at any time. Any disputes regarding this policy will be settled by HR.

Definitions

Direct Discrimination - Occurs when a person is treated less favorably than others in similar circumstances on the grounds of race, color, national or ethnic origins, sex, marital status, sexuality, disability, membership or non-membership of trade union, class, age, political or religious belief.

Indirect Discrimination - Occurs when a condition or requirement is imposed which adversely affects one particular group considerably more than another and cannot be strictly justified in terms of requirements for performing the job.

Harassment - is defined as unwanted, unreciprocated and/or uninvited comments, looks, actions, suggestions or physical contact that is found objectionable and offensive and that might threaten an employee's job security, or create an intimidating working environment. Harassment is particularly liable to occur as part of sexual or racial discrimination.

The Company's Responsibility as an Employer

For the Equal Opportunities Policy to be fully effective, the responsibility for ensuring that its terms are adhered to will lie with the Head of HR. It is, however, the responsibility of each manager and all other supervisory staff actively to promote equality of opportunity within their own programs and spheres of responsibility. It should not be overlooked that harassment can take many forms e.g. age, religion, skin color, sexual preference, disability - even dialect or accent - can all form the basis for unwanted aggression and attention. Victimization in the widest sense of the word is also a form of harassment and those exposed to or subject to such action need protection.

Kambi will take disciplinary action against employees who are found to infringe the Equal Opportunities Policy.

What Kambi expects from the Employees

While the main responsibility for providing equal opportunity lies with Kambi, individual employees at all levels have responsibilities too. Getting rid of discrimination depends on everyone's collaboration.

Employees should not harass, abuse or intimidate other employees on any grounds including those of disability, race, sex or sexual orientation.

Employees should co-operate with measures introduced by the Company to make sure there is equal opportunity and non-discrimination. Employees must not victimize individuals on the grounds that they have made complaints or provided information about discrimination or harassment.

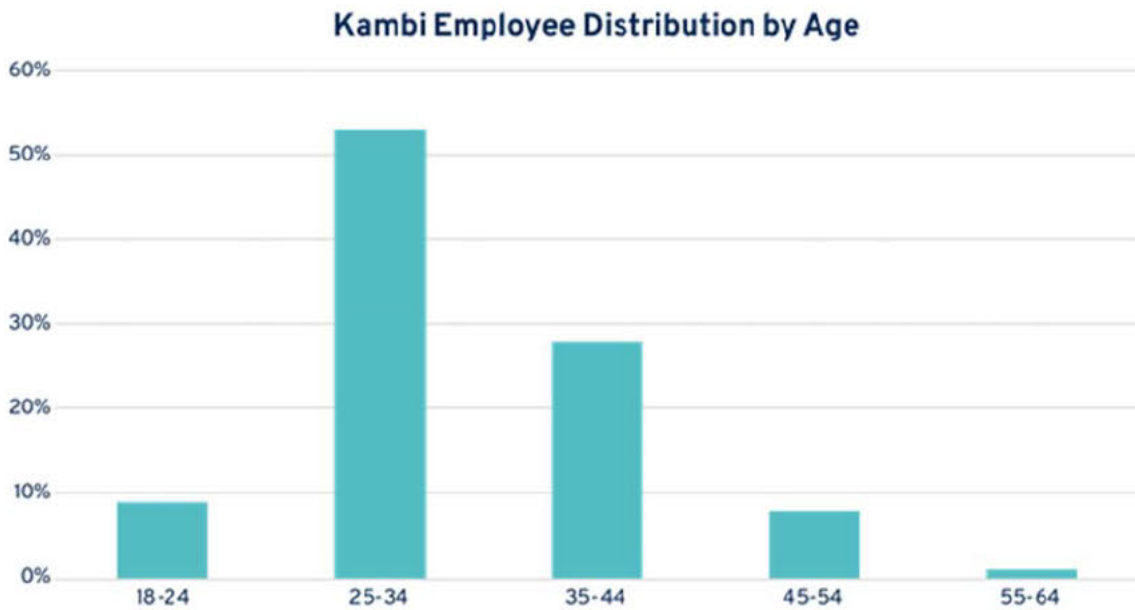
B. workforce demographics demonstrating the organization’s current workforce diversity

Kambi’s demographic data in this section comes from its company-wide (global) Culture Amp survey, most recently completed in May of 2021.

Gender Distribution

| Kambi Gender Demographics – Percent Female Distribution | Q3/20 | Q4/20 | Q1/21 | Q2/21 |
|--|--------------|--------------|--------------|--------------|
| Board of Directors | 40% | 40% | 40% | 40% |
| Senior Leadership | 21.1% | 21.1% | 21.1% | 21.1% |
| Technology | 19.0% | 19.0% | 20.0% | 20.9% |
| All | 19.1% | 18.5% | 19.0% | 19.2% |

Age Distribution



Kambi does not actively track other personal demographic data in line with our GDPR policy guidelines (GDPR is a regulation in European Union law on data protection and privacy) but from October 2021 we will be running an annual Inclusion Survey with our Engagement

platform partner (Culture Amp) that will enable us to bring data to the table; highlighting if, where, and how different groups of employees experience our culture differently.

Data privacy

By running the survey through our partner, it ensures sensitive individual employee's data is never stored by Kambi, results are only ever visible in aggregate with a pre-defined minimum reporting size while still offering actionable data and insights.

The inclusion survey combines the measurement of evidence-based and research-driven constructs, inclusive demographics, global benchmarking, text analytics, and an action framework driven by collective intelligence. By collecting, understanding, and acting on feedback related to diversity, equity, and inclusion, we can learn how employees with intersectional identities experience Kambi's culture.

More than visible attributes

The Inclusion Survey promotes the thinking that diversity goes beyond visible traits which is something we really value. By including structural aspects, we can foster a culture that includes a broad and encompassing definition of diversity. The survey will include Family Status, Disability Status, and Socio-economic Status (measured by the degree of education obtained by parents/legal guardians).

Fanatics Sportsbook

Fanatics fosters an inclusive work environment for racial, ethnic and gender diversity through its "IDEA" initiative (Inclusion, Diversity, Equality and Advocacy). Through IDEA, Fanatics is committed to providing its employees with transparent, fair, and inclusive processes, free from discrimination of any form. Fanatics' team mission is to build a comprehensive plan to drive a diverse culture of inclusion that influences our employees, vendors, partners and fans. We strive to reflect all communities where everyone feels empowered to bring their full, authentic selves to work. IDEA is a long-term journey that we are just beginning with intention, but with the help of us all, we will be a role model organization for culture, diversity & inclusion. Fanatics defines the four key pillars of this initiative as follows:

- **Inclusion:** belonging; knowing the reality of different groups and recognizing/accepting their challenges, contributions and strengths
- **Diversity:** representation at Fanatics; what makes each of us unique (identities, perspectives, experiences, lifestyle choices and more)
- **Equality:** the state of being equal; especially in status, rights and access to opportunity - where race or gender is not a determining factor in any decision
- **Advocacy:** intentional listening; understanding and supporting each other, being a champion, ally or sponsor for someone not like you

Specific goals include increased representation in Fanatics' workforce of people of diverse races, ethnicities, genders, age, physical abilities, educational background, and more; increasing diversity in top leadership positions and the boardroom; increasing supplier diversity; and achieving high levels of engagement and inclusion for all employees.

Fanatics utilizes several strategies to achieve its diversity and inclusion goals. Fanatics trains all hiring managers regarding unconscious bias, resumes are reviewed blindly, and Fanatics targets specific outreach to diverse candidates. Fanatics invites its employees to share their thoughts and ideas regarding diversity, including through networking events, celebrations, and a Slack channel; provides opportunities for training and development focused on diversity and inclusion; and facilitates community service opportunities. Fanatics tracks its diversity statistics, including in hiring, turnover, and upward progress within the company, and shares its findings with employees. Finally, Fanatics hosts two annual all-company D&I Summits, which provide employees with trainings and seminars as well as the opportunity to share their input regarding the company's initiatives.

Fanatics also has its Fanatics' Athlete/Ally Network ("FAN"), which consists of five employee-led Employee Resource Groups, each with executive sponsors: Women's Initiatives, Family First, Global Black Experience Alliance, Multi-Cultural, and Pride. Collectively, the FAN groups help foster an inclusive culture at Fanatics through event hosting, community outreach, supporting and recruiting new talent, and contributing to business decisions.

Fanatics also demonstrates its commitment to social justice reform through its involvement in the REFORM Alliance, where Fanatics executive chairman Michael Rubin serves as co-chair. After the unjust imprisonment of Meek Mill, the REFORM Alliance was formed, seeking to transform the current probation and parole system, which results in hundreds of thousands of people being sent to prison each year for minor technical violations. Parole and probation have become a web of confusing and ineffective conditions that keep people trapped in a revolving door from probation and parole to prison, excluding people reentering society and achieving wellness and stability. REFORM has played an instrumental role in legislative wins across the country, including the passage of New York's Less is More: Community Supervision Revocation Reform Act, which will:

- Restrict the use of incarceration for technical violations. Certain technical violations could still result in jail time, but it would be capped at a maximum of 30 days.
- Bolster due process by ensuring that instead of being automatically detained in local jails, people accused of a technical violation of parole would be issued a written notice of violation with a date to appear in court and would remain at liberty for any hearings. People on parole accused of a new criminal offense would be afforded a recognizance hearing in a local criminal court before they are detained, and the standards of the bail reform statute will apply.
- Provide speedy hearings for persons under community supervision, giving them a speedy adjudicatory hearing upon an alleged violation of their conditions of release. Hearings would be conducted within 30 days rather than taking up to 105 days.
- Provide earned time credits for people under community supervision, making individuals eligible to earn a 30-day "earned time credits" reduction in their community supervision period for every 30-day period in which they do not violate a condition of supervision.

Fanatics' most recent employee engagement survey indicates that 80% of Fanatics employees report feeling comfortable being themselves at work, 78% of employees feel their team has a climate in which diverse perspectives are valued, and 77% feel empowered to make decisions regarding their work. Fanatics employees have completed over 9,500 IDEA courses in 2020 so far, including courses titled "Be More Curious," "Defining Diversity," and "History of Diversity."

Fanatics' workforce demographics

Racial diversity

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Penn National Gaming

Penn National is deeply committed to cultivating a culture and environment where all of our team members, regardless of their differences, feel like they truly belong. Last year, amid one of the most challenging times in our nation's history, as the world grappled with an outpouring of racial and social anguish, we formed the Penn Diversity Committee. Its mission is to put Penn National's long-standing support of diversity and inclusion into action. The Diversity Committee is chaired by Justin Carter, Senior Vice President of Regional Operations. The committee, which reports directly to our CEO Jay Snowden, is comprised of underrepresented team members from around the country and at varying levels in the organization to ensure our Company has mechanisms in place to listen to team members about important ongoing social justice issues, and to help implement the following key initiatives:

Recruitment & Company Demographics

- a. Increase recruiting efforts and support of Historic Black Colleges and Universities (HBCUs) and universities with diverse populations and organizations.
- b. Integrate HBCUs and Universities that promote diversity into our Leadership Excellence at Penn National Gaming ("LEAP") Program, which provides hands-on training, mentoring and real world experience to new or recent college graduates who are interested in building a long-term career in the gaming industry. 20% of all LEAP candidates in 2021 attend HBCUs ii. HBCU representation in the LEAP program has grown from 1 school (.6%) in 2020 to 15 in 2021 (9.8%)
- c. Track adherence to our minority interview initiative, "The Penn Way," for executive roles at our Company. 100% of open executive roles within Penn included either female or ethnically diverse candidates

Leadership Development

- a. Initiate companywide mentorship and leadership development program for underrepresented team members.
- b. Provide unconscious bias and inclusion training for managers and above.
- c. Provide diversity and inclusion training in our mandatory companywide training program, ("RESPECT").

Procurement

- a. Create benchmarks for qualified minority supplier spend across our organization, with an initial target [REDACTED] annual growth companywide.
- b. Increase the number of minority business networking events we attend and host

Scholarship Fund

In March, we launched the Penn National Gaming Diversity Scholarship program, funded through a \$1 million annual commitment from Penn to our diversity initiatives. We plan to extend up to 65 scholarships this year to the families of our underrepresented team members to pursue higher education.

Community Engagement

Support organizations in our communities that promote equality, justice, diversity, and inclusion through direct donations and by encouraging our team members to volunteer their time and energy to help aid underrepresented and disadvantaged individuals.

Penn Workforce Demographics

Penn National Gaming has also made incredible strides in increasing diversity in its employee base as well as its managers. This can be seen in the stats below:

- 25% of all Penn team members self-identify as African American.
- 18% of all Penn managers self-identify as African American.
- 8% of all Penn team members self-identify as Asian American.
- 10% of all Penn team members self-identify as Latino/Hispanic.
- 48% of all Penn team members are female.

Penn Interactive, collectively with Penn, partners with several organizations to reach a diverse audience and give back to its community. Below are just some examples of how we foster workforce diversity and outreach.

The Penn Diversity Committee

In 2020, Penn established the Penn Diversity Committee to ensure Penn has open avenues to communicate with and learn from team members about important ongoing social justice issues. The Penn Diversity Committee established a companywide “Days of Listening” program. This program creates opportunities for teams to talk and give feedback about the company. Penn will use the specific feedback to create plans to improve for the remainder of 2021 and beyond. Additionally, the Penn Diversity Committee provides hands-on-training, mentoring and real-world experience to new hires to foster long-term success.

The Diversity Committee is chaired by Justin Carter, Senior Vice President of Regional Operations. The committee, which reports directly to our CEO Jay Snowden, is comprised of underrepresented team members from around the country and at varying levels in the organization to ensure our Company has mechanisms in place to listen to team members about important ongoing social justice issues, and to help implement the following key initiatives:

- Recruitment & Company Demographics
- Leadership Development

- Procurement of Minority-Owned Suppliers
- Penn Diversity Scholarship Fund
- Community Engagement

All-in Diversity Project

Penn partnered with the All-In Diversity Project, which works to support diversity, equality, and inclusion in business. Spanning Black History Month and International Women’s Day, the #OpenDoors campaign was designed to raise awareness of how others affect our professional development and recognize that people do not progress in their careers without the help of someone along the way. The campaign asked contributors to thank someone who opened a door for them, and then pledge to pay it forward and hold the door open for someone else.

Penn Interactive was awarded the 2021 Top Workplace Awards by the Philadelphia Inquirer, which recognizes the best employers in the Greater Philadelphia in the public, private, nonprofit and government sectors. Earning this designation as a Top Workplace signifies an organization’s commitment to developing and sustaining a culture that supports, promotes, and values its employees.

Temple University’s School of Tourism and Hospitality’s Student Minority Alumni Coalition

Penn Interactive will be partnering with Temple University’s School of Tourism to host a mentorship program for talent acquisition and recruiting. Temple University provides resources for diverse students to ask questions, be mentored, and share experiences with one another. Penn Interactive will also take part in Temple’s diversity events and job fairs during the 2021-2022 school year.

Hopeworks is a non-profit based in Camden, New Jersey that provides a positive, healing atmosphere that propels young people to build strong futures and break the cycle of violence and poverty. Penn Interactive is committed to working with Hopeworks toward its mission statement as well as hire individuals for its Player Experience Agent positions from Hopeworks’ programs. Penn Interactive also sends all its junior IT roles to Hopeworks to engage with its members and garner interest.

Penn Interactive partners with the job recruiting site InHerSight, which is the leading company review and job listing site for women. Penn Interactive posts all its jobs on InHerSight in hopes of targeting a larger number of female candidates for all positions, entry level to leadership. InHerSight has featured seven women of Penn Interactive in their articles that highlight everything from “Pandemic Moms,” International Women’s Day, company culture, and much more.

Women in Gaming

Penn and Penn Interactive have several programs to support women in gaming. Women Leading at Penn (“WLP”) Program was established in 2018 to further female leadership development and roles. The WLP’s goal is to help females network, inspire, and encourage other women to pursue leadership roles. As a result of these efforts, 34% of the leadership positions at Penn are held by women.

Penn Interactive celebrated International Women’s Day by participating in the #ChooseToChallenge, a movement to challenge the world gender bias and inequality.

Leadership Excellence at Penn National Gaming (“LEAP”) Program

The LEAP program provides hands-on-training, mentoring and real-world experience to new or recent college graduates who are interested in building a long-term career in the gaming industry. In 2021, Penn committed to integrating more Historic Black Colleges and Universities (“HBCU”) and Universities with diverse populations and organizations into this program. At the time of this report, 9.8% of all LEAP members attend HBCUs, which has grown from .6% in 2020.

COVID-19 Relief Fund

Penn has established a special COVID-19 Emergency Relief Fund under the Penn National Gaming Foundation to aid team members and local relief organizations. In 2020, we raised more than \$1.7 million from personal donations from our CEO Jay Snowden and senior management team, our Board of Directors, property general managers, and contributions from our Foundation and property employee assistance programs. Additionally, in December 2020, we added another \$2 million to that fund to provide necessary assistance for our former team members who continue to transition to new roles, industries, and professional careers.

Most recently, we joined Barstool Sports Founder Dave Portnoy’s personal mission to help save and sustain small businesses who have been impacted by COVID-19, contributing more than \$4.6 million, and counting, to the nonprofit “Barstool Fund.” To date, the Fund has raised over \$36 million and is actively supporting 288 small businesses around the country.

This is in addition to our collective effort in October to save the historic Reading Terminal Market in Philadelphia, which was suffering from decreased business as a result of COVID-19 and launched an online fundraising campaign to assist with its survival. Penn National and Barstool stepped up and in 24 hours raised enough money to meet and exceed their fundraising goal. Our effort ensured the survival of an organization that supports family businesses, educational opportunities for low-income Philadelphia youth, and is one of the largest sites for the redemption of SNAP benefits in Pennsylvania.

Meanwhile, during the mandatory COVID-19 temporary closures, our 41 properties in 19 states throughout the country donated more than 45 tons of food to local food banks and homeless shelters in our communities, ensuring our perishable food items could help those in need at the

height of the pandemic. In addition, our properties donated thousands of unused masks and surgical gloves to first responders and healthcare providers. Many of our properties served as COVID-19 test sites and housed emergency personnel, in addition to organizing food drives and blood donations.

Pride Month

In 2019, Penn developed standards at each of its properties to ensure accessibility of facilities and training and communication to team members regarding LGBTQ+ rights. In addition, Penn works closely with the LGBTQ Center in Las Vegas, which fights to protect the well-being and human rights of the LGBTQ community.

Supporting our Veterans

Later this year, Penn and Penn Interactive will be partnering with the Hiring Our Heroes initiative, which connects veterans, service members, and military spouses with meaningful employment opportunities. Penn Interactive is committed to hiring through this program to further unite the military community with Penn to create better economic opportunities and a more diversified workforce.

6.6 - OTHER FACTORS IMPACTING REVENUE TO THE STATE

The award of a Mobile Sports Wagering License to Kambi as a Platform Provider as well as Penn Sports Interactive, LLC's Barstool Sportsbook ("PSI" or "the Barstool Sportsbook") and Fanatics Betting and Gaming's Fanatics Sportsbook ("Fanatics" or "the Fanatics Sportsbook") as Operators will uniquely benefit the state of New York and its sports betting residents.

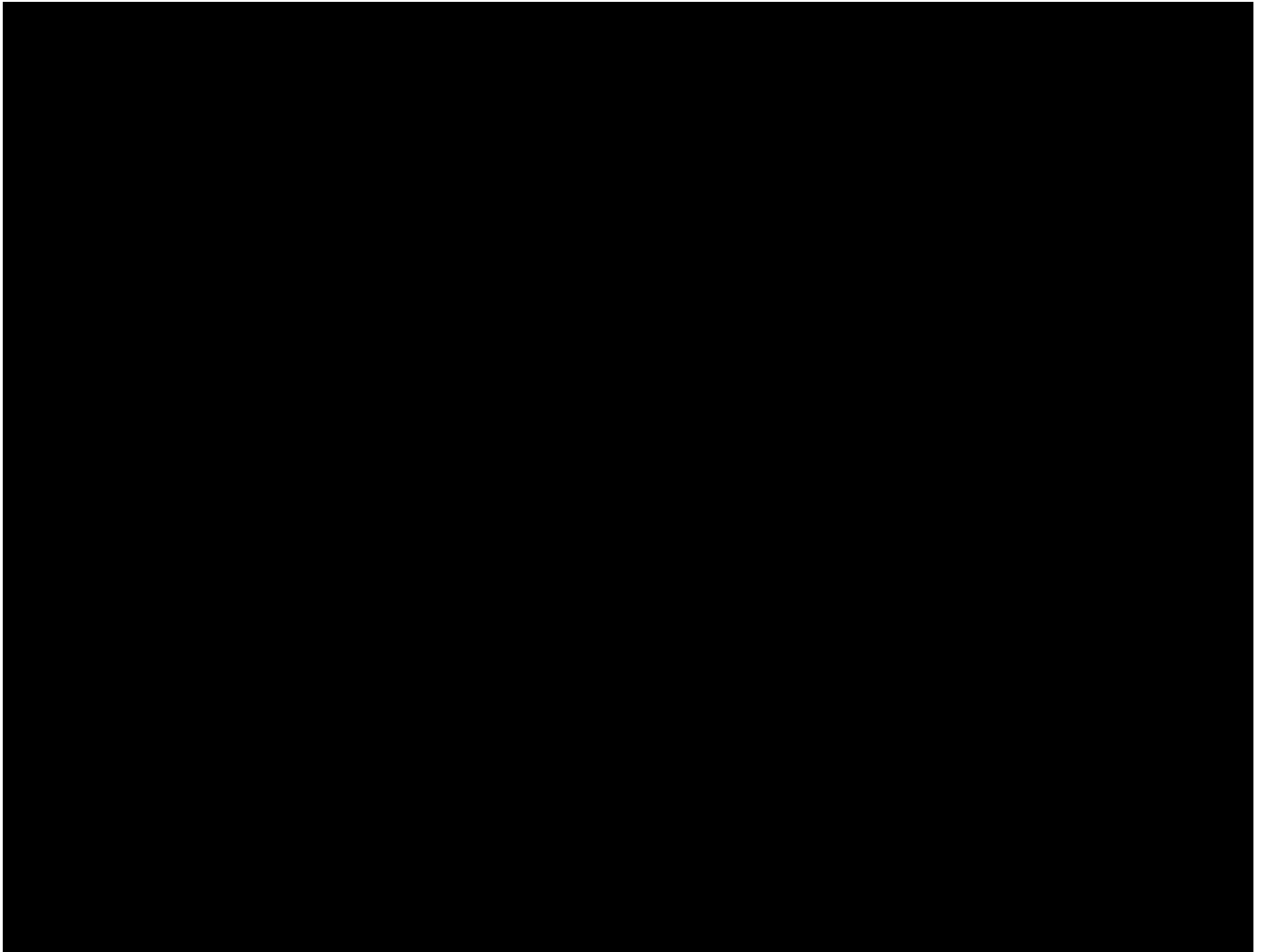
The Barstool Sportsbook and Fanatics Sportsbook's presence in New York will not only allow the State to reach its market potential, it will uniquely expand the sports wagering market in New York by bringing their incremental sports fans (and revenue) into the tax base. First, and foremost, Barstool Sportsbook and Fanatics represent the only two operators that will grow the sports wagering market in New York rather than simply stealing competitor market share. Second, the Barstool Sportsbook and the Fanatics Sportsbook are uniquely New York - with Barstool Sports, Inc. and Fanatics being headquartered in New York. Third, PSI and Fanatics are stable businesses with positive cash flows and a clear path to profitability, ensuring longevity and staying power as marquee operators in the State without having to rely on fickle capital markets. Last, PNG and Fanatics are highly diversified businesses with large existing databases and multiple revenue streams, providing for competitive advantages in user economics and the ability to leverage existing assets to complement their online sports betting businesses.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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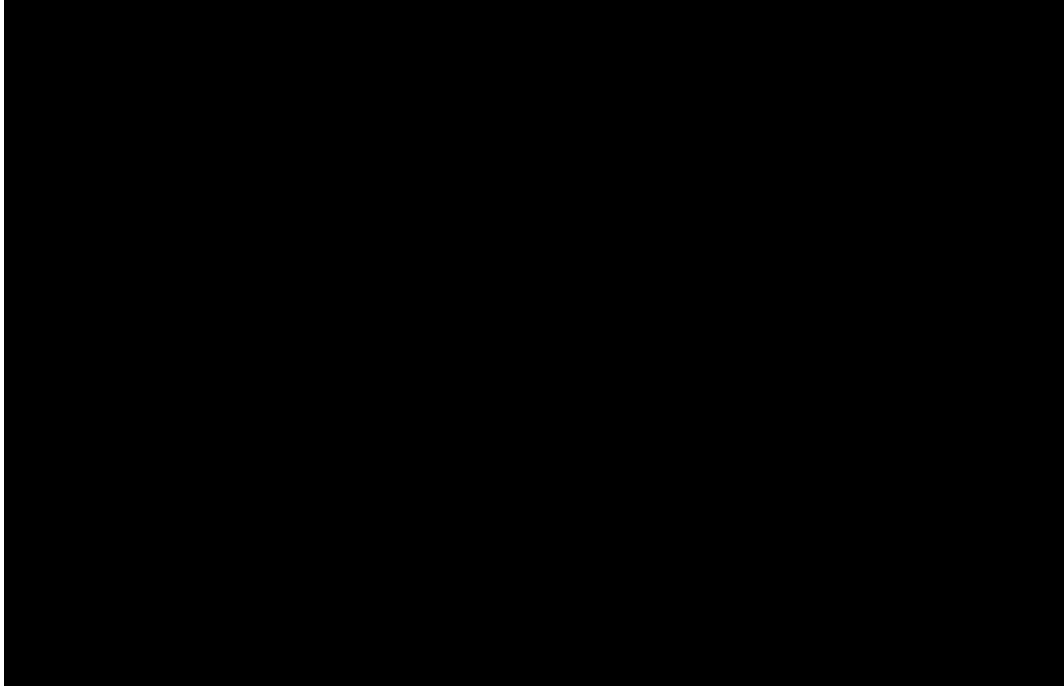
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[Redacted]

[Redacted]

[Redacted]



Additional Factors: Bettors' affinity with the Kambi Platform

Kambi is the leading sports betting supplier to the US and that includes the American Northeast, where the concentration of bettors who play on Kambi's platform is at its highest. Kambi processed the first regulated sportsbook wagers in NH, NJ, PA and NY. A strong start and an outstanding sportsbook product allow us to maintain the highest player retention rates in the industry, a key pillar for long-term and sustainable success.

The effect of this for the Commission is that bettors in the greater New York area are quite familiar with the UX and outstanding offering that Kambi provides. [REDACTED]



Moving east from Pennsylvania, New Jersey revenues tell a similar story, as Kambi partners combined for [REDACTED]% - [REDACTED]% of all revenue the last six quarters, again reflecting the affinity that bettors on the East Coast have for Kambi's product. [REDACTED]

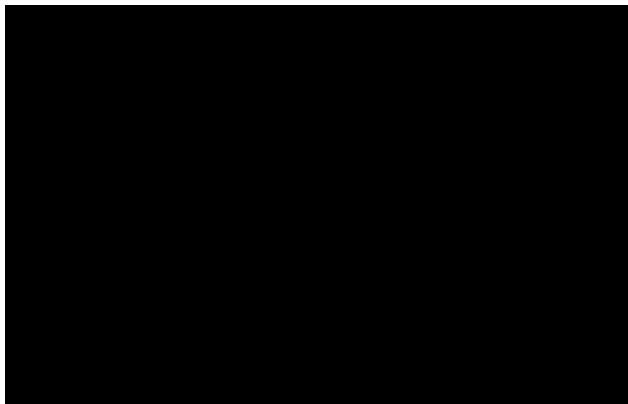


[REDACTED]

New Jersey is an important state to highlight, given the immediate proximity to New York and the population density that lives along the border of both states. GeoComply, the geolocation service used by many US Operators, published a report on New Jersey stating that 44% of all bets are made within two miles of the state border, and 80% within ten miles of the state border. This density is believed to be significantly influenced by New York City dwellers, who cross over into New Jersey to place their wagers. By some estimates, New York bettors spent an estimated \$837 million in New Jersey last year due to the lack of New York mobile sports wagering options. While it is excellent that New Yorkers will soon be able to place wagers from their home state, it is imperative for The Commission to know that these bettors residing along the border have made it clear: the Kambi Sports Wagering Platform is their preferred betting experience.

Additional Factors: Kambi’s New York Performance to Date

The State of New York has always been an important one to Kambi, where it already established as the market-leading Platform in the retail space. As mentioned before, Kambi imprinted itself into New York history by processing the state’s first legal retail sports wager in July of 2019, at Rivers Schenectady. Since that historic first bet, Kambi asserted itself as the market leader, and never let go of its podium position. Of the \$29.9 million in publicly reported revenues since the inception of sports betting in New York, Kambi’s two properties have produced nearly \$23 million. This amounts to a 76% market share of the State’s reported revenue to date.




That market share continues to grow with time, as Kambi’s 2021 market share in New York

[REDACTED]

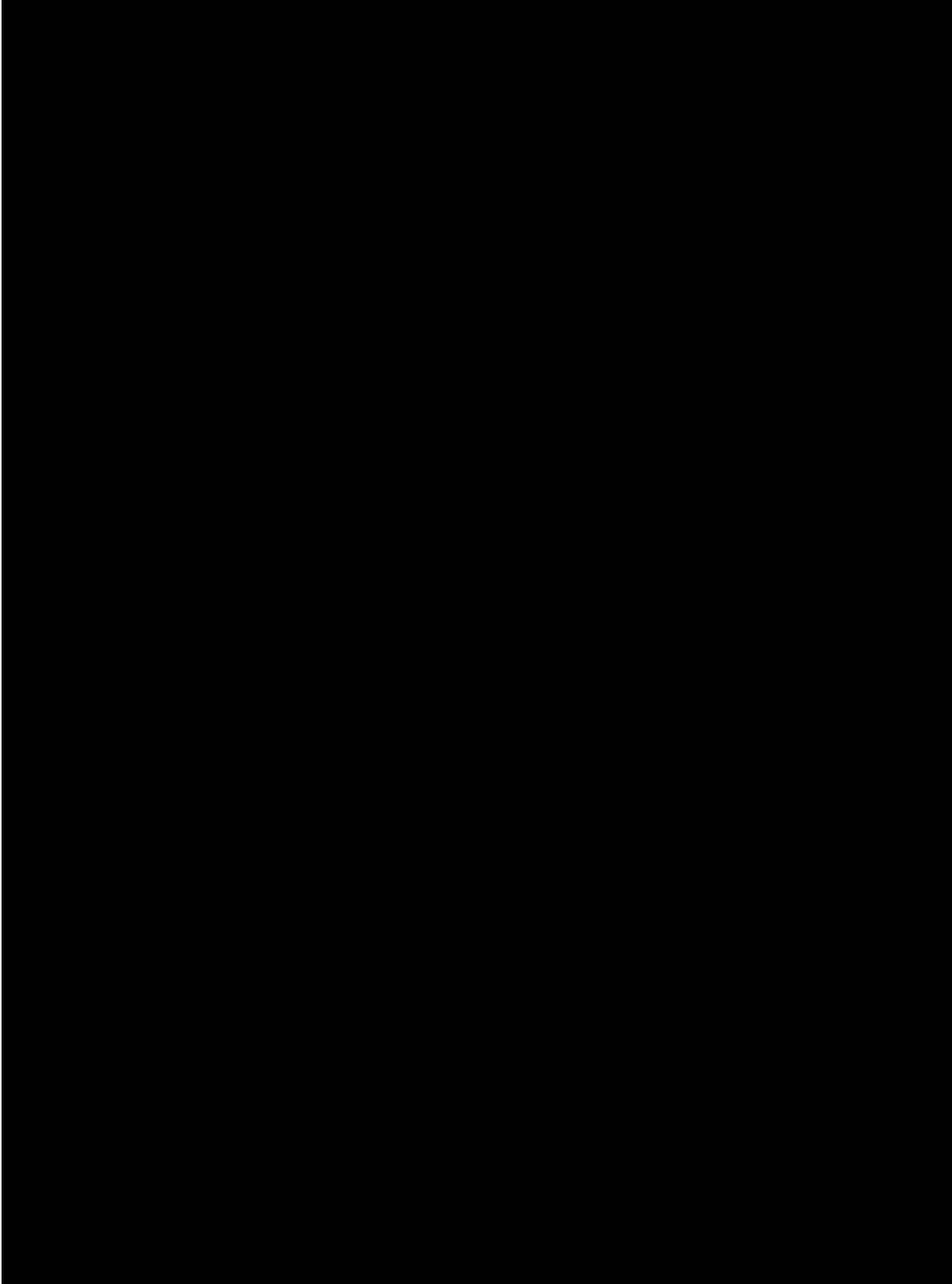
While a different product vertical (retail vs. online) Kambi believes this should offer The Commission confidence in selecting the Kambi Platform, as it has already once proven to The State its ability to deliver, and can assure The Commission that mobile will provide the same success story.

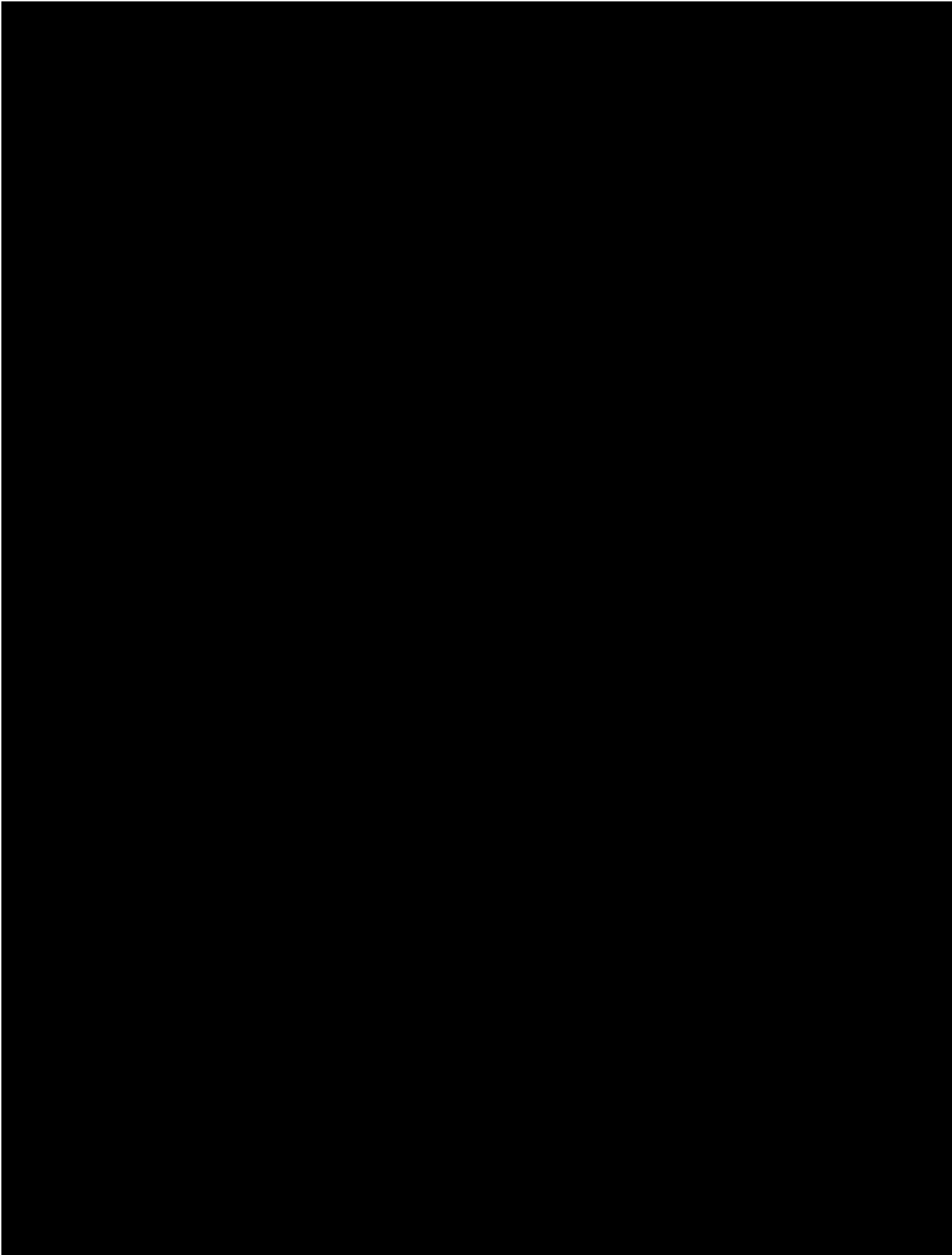
6.7 - REVENUE-SHARING AGREEMENTS

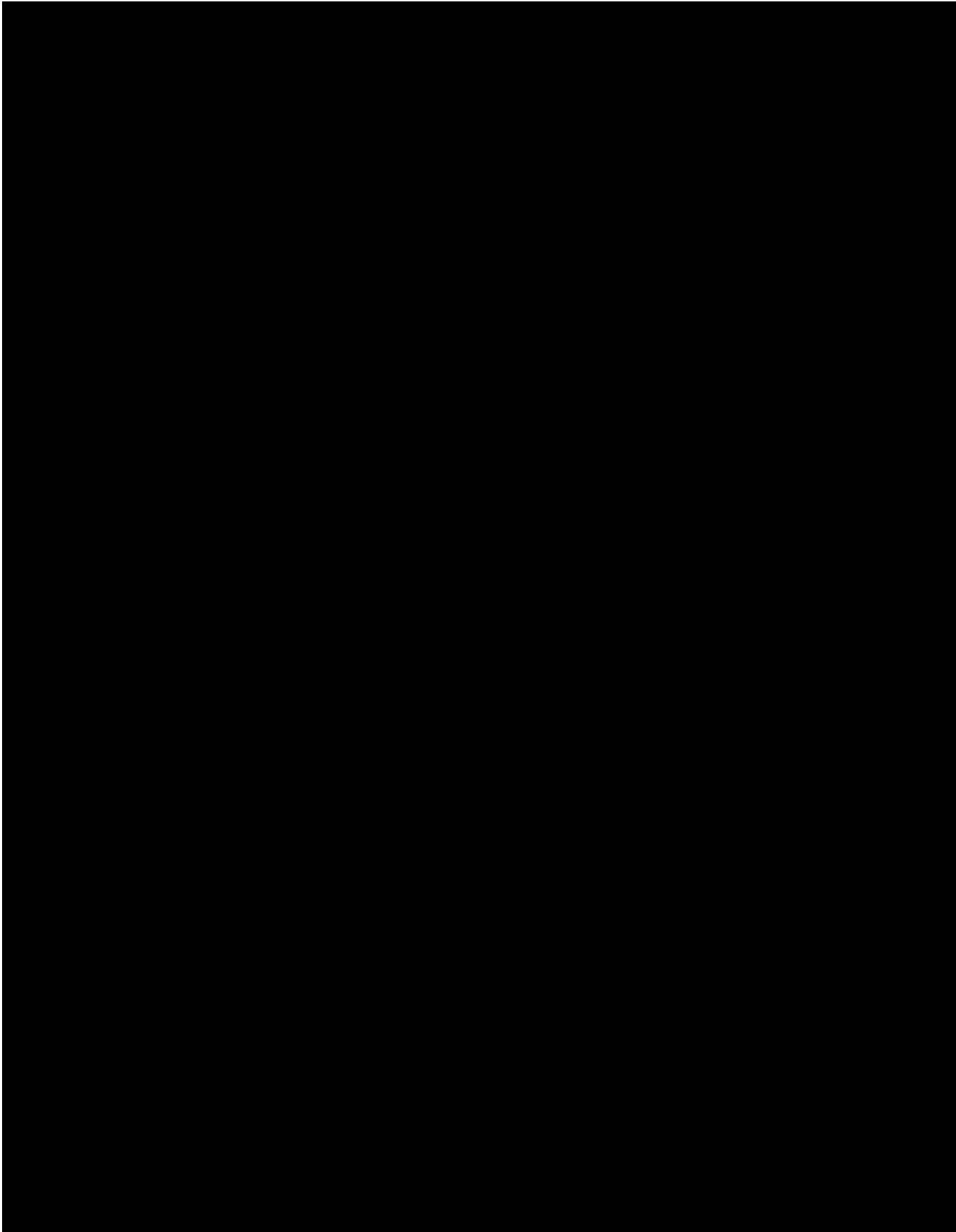
Fanatics and PSI entered into a strategic alliance with the Saint Regis Mohawk Tribe (“Mohawk Tribe”),

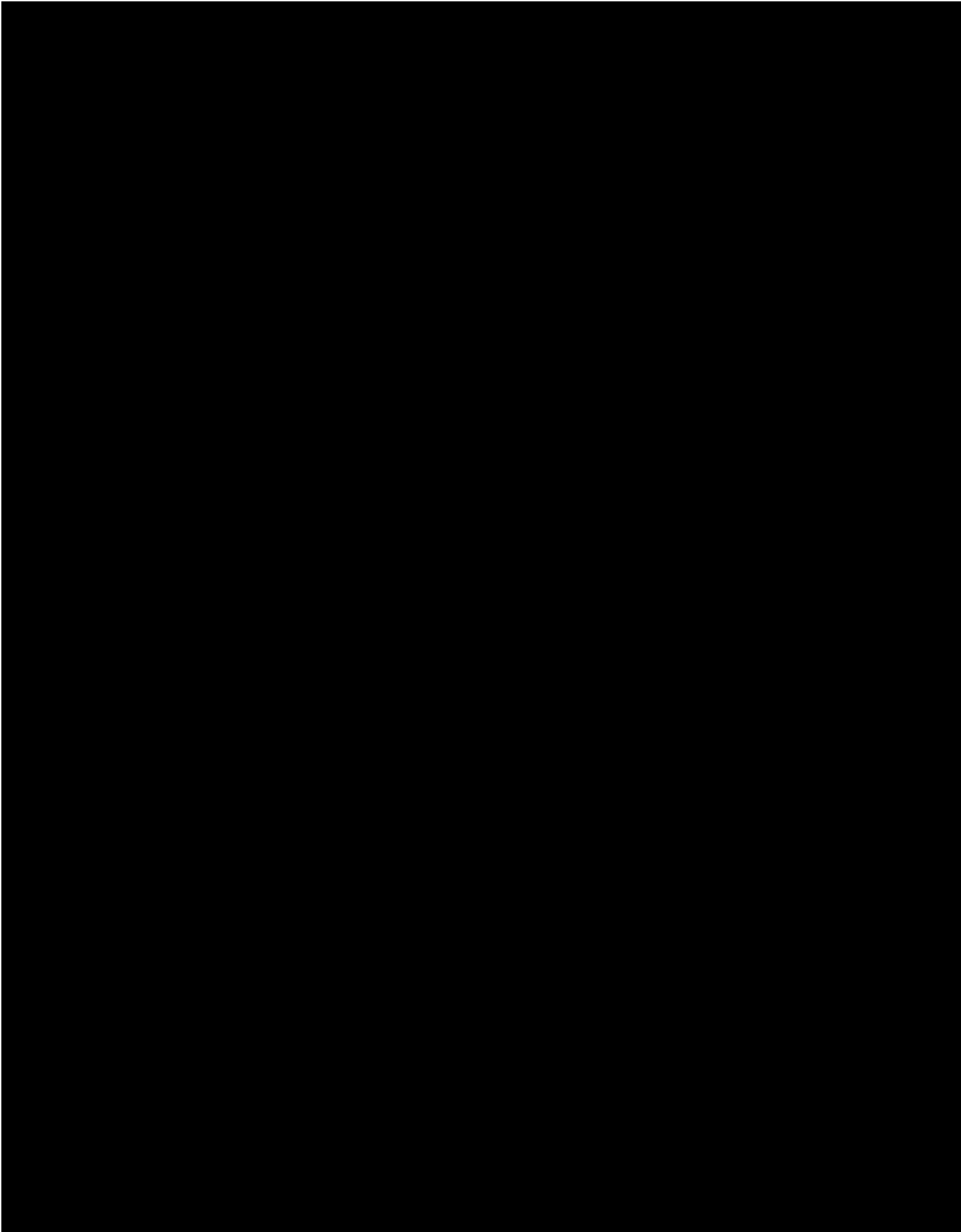


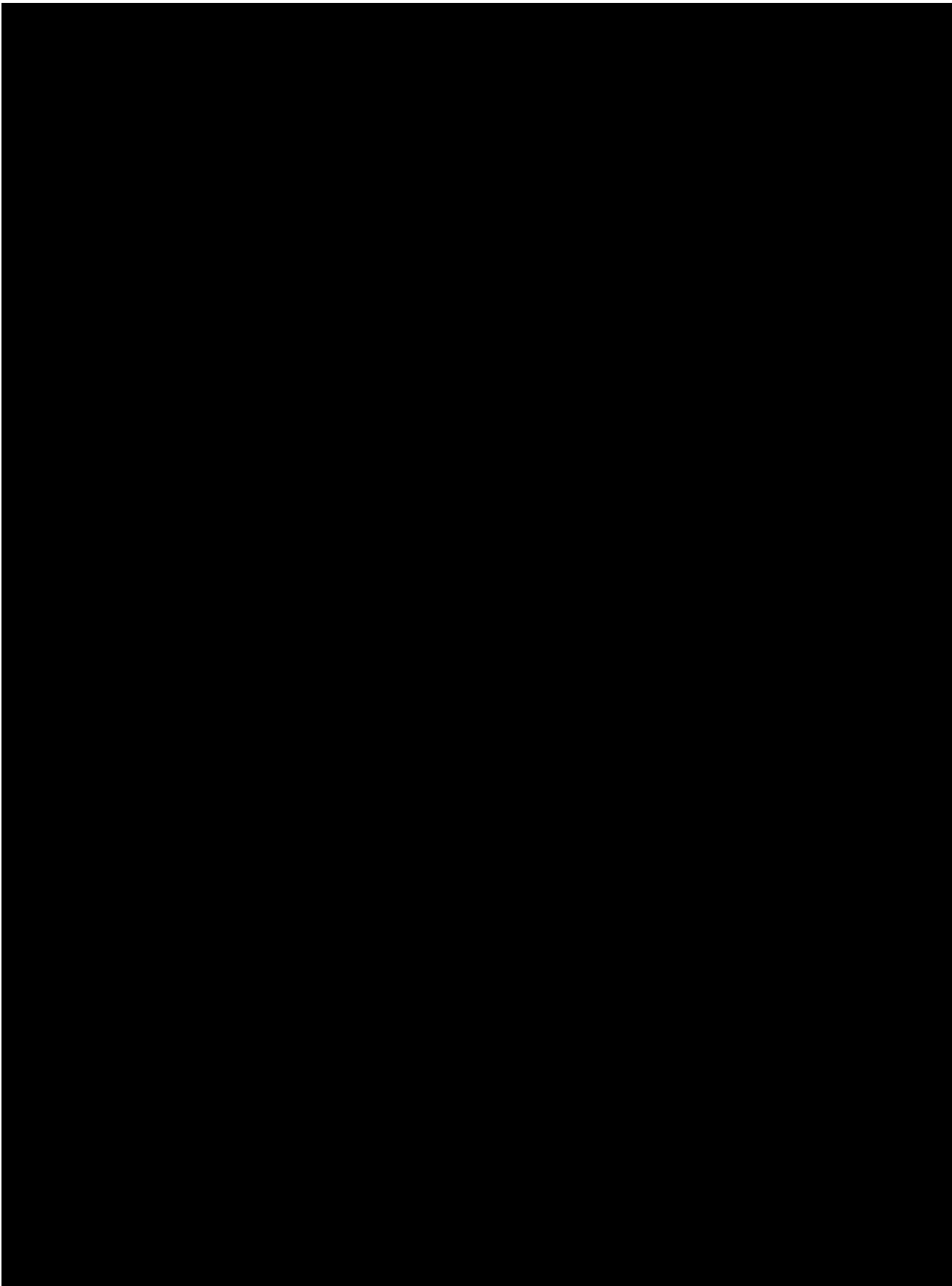
The historic Mohawk Tribe is one of the five original members of the Iroquois League, known as the Keepers of the Eastern Door and the ideal partner for Fanatics. As has been established throughout this Application, Fanatics’ and PNG’s access to expansive and fiercely loyal audiences is what will separate these two sportsbook offerings from the rest of the New York market. As such, not only will the Mohawk Tribe benefit from a large percentage of a significant market share, as well as the protection of a minimum yearly guarantee, the Mohawk Tribe, PNG and Fanatics will each materially benefit from the audiences and access they give one another in the New York market.

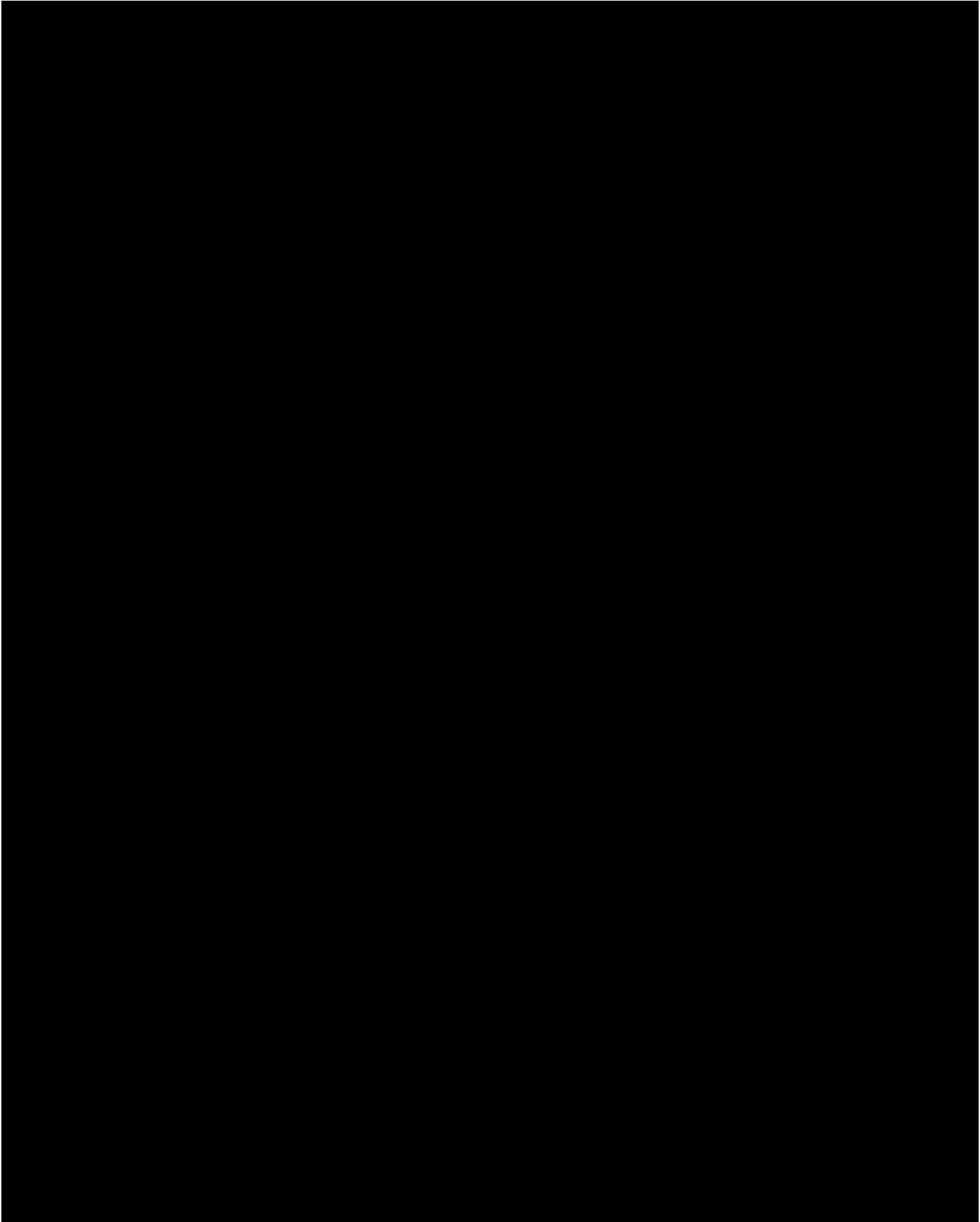


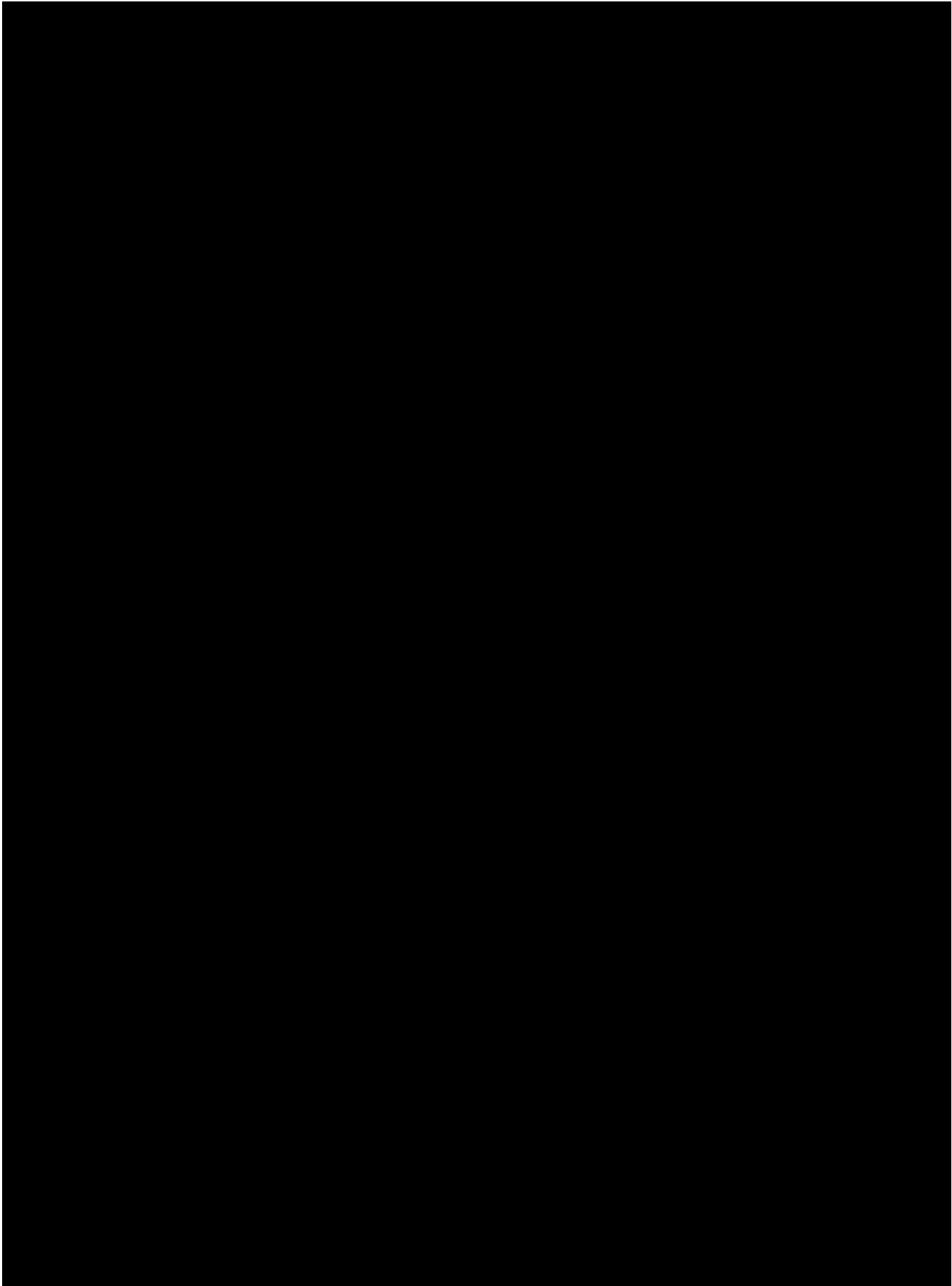


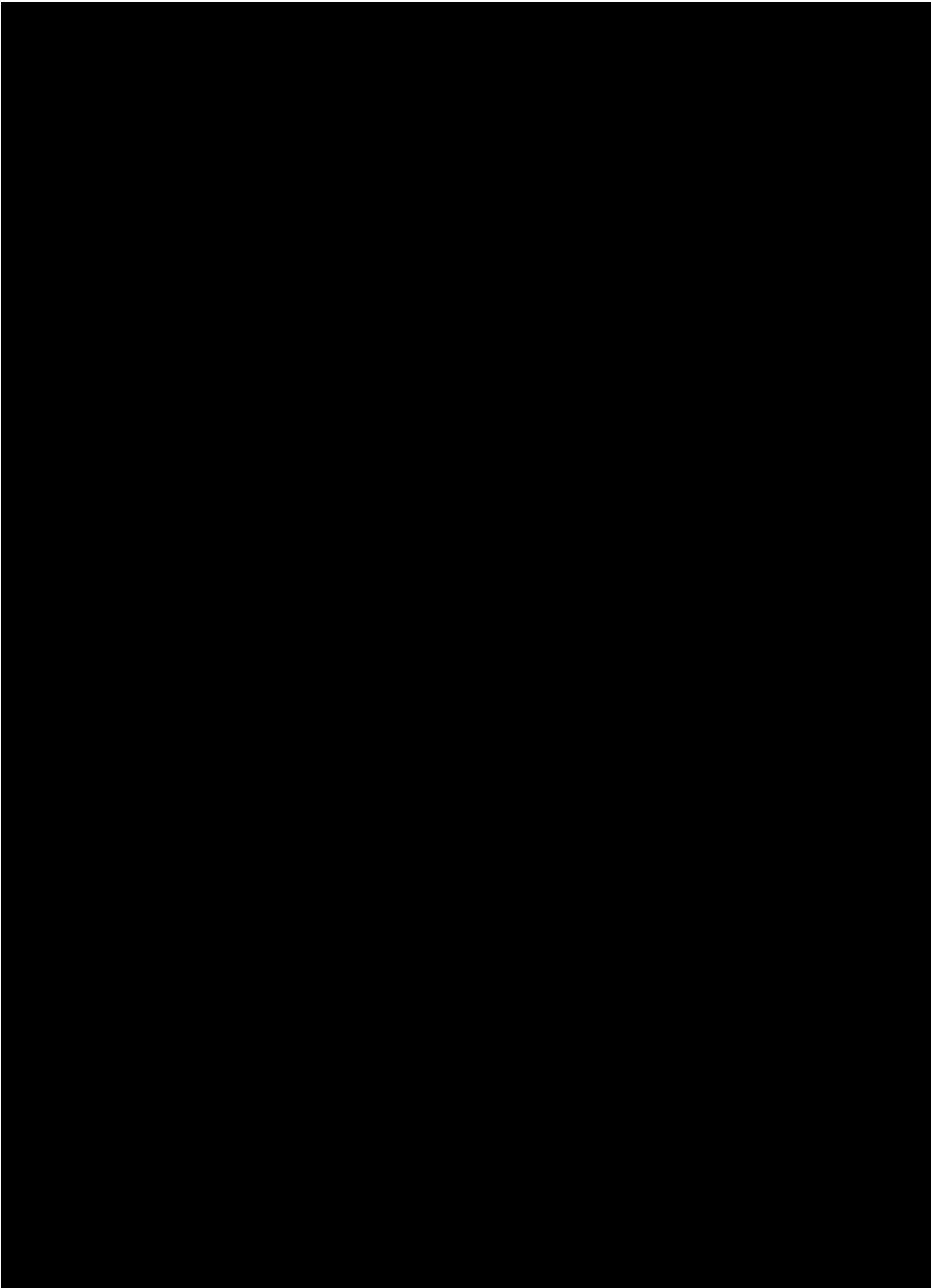


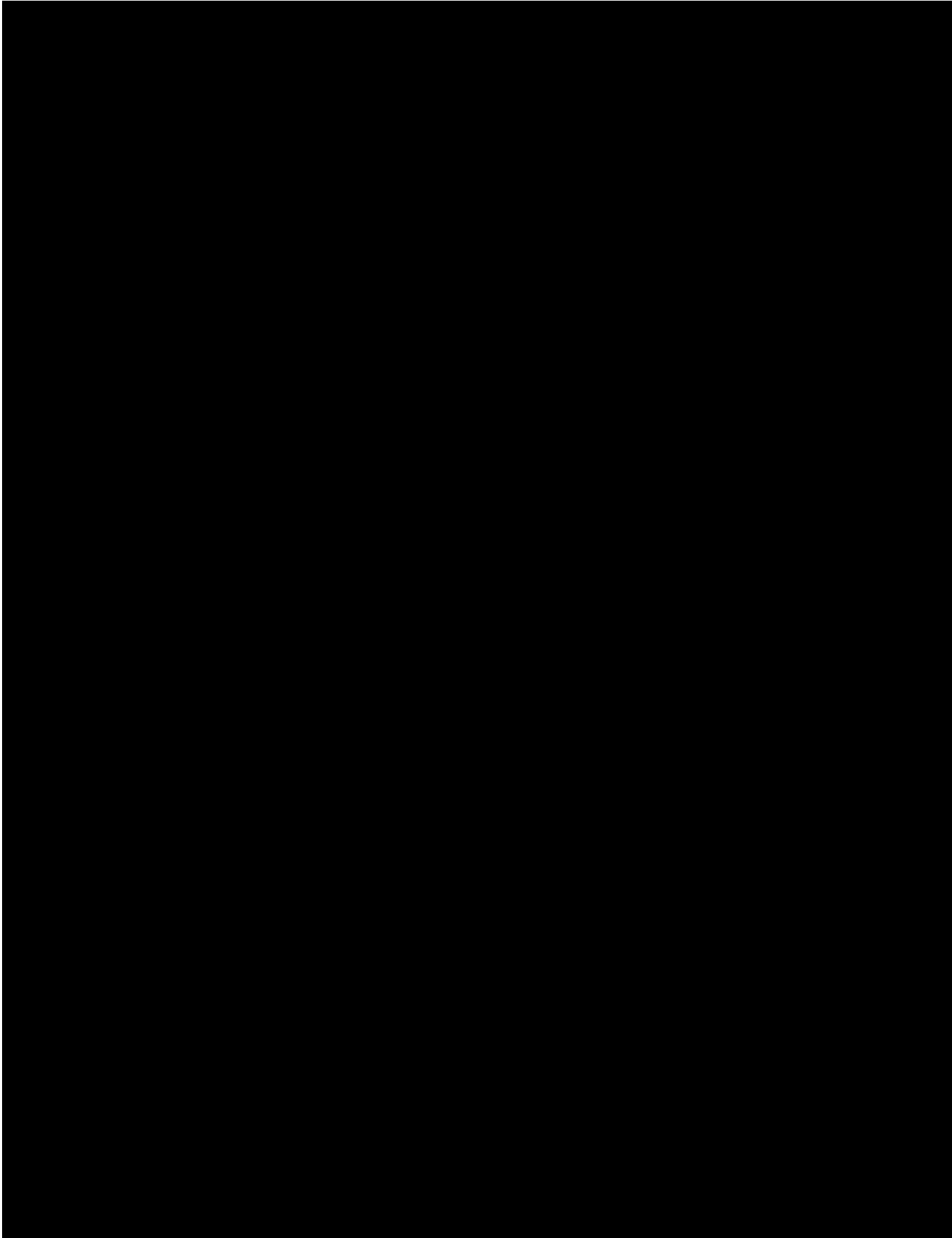


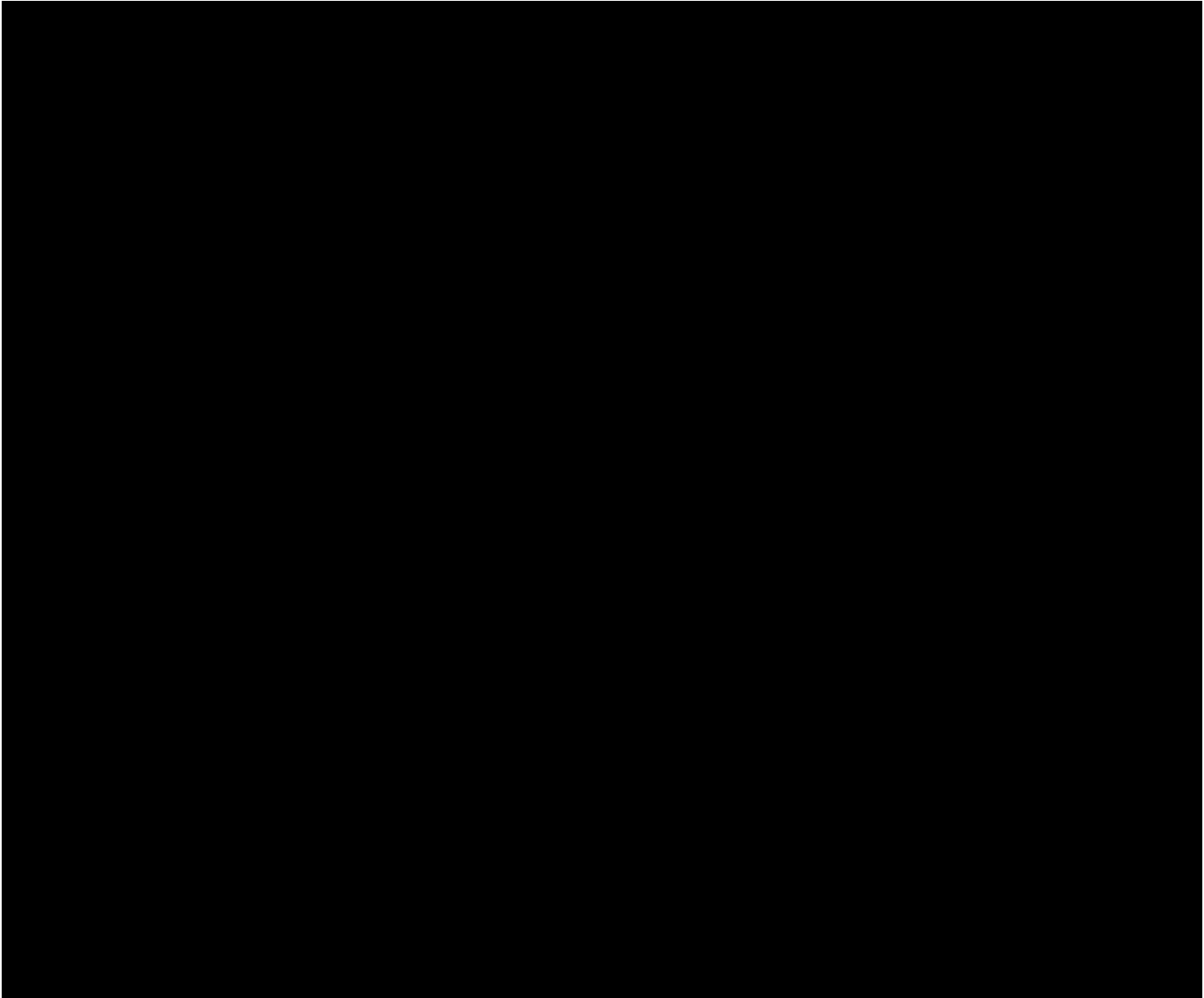


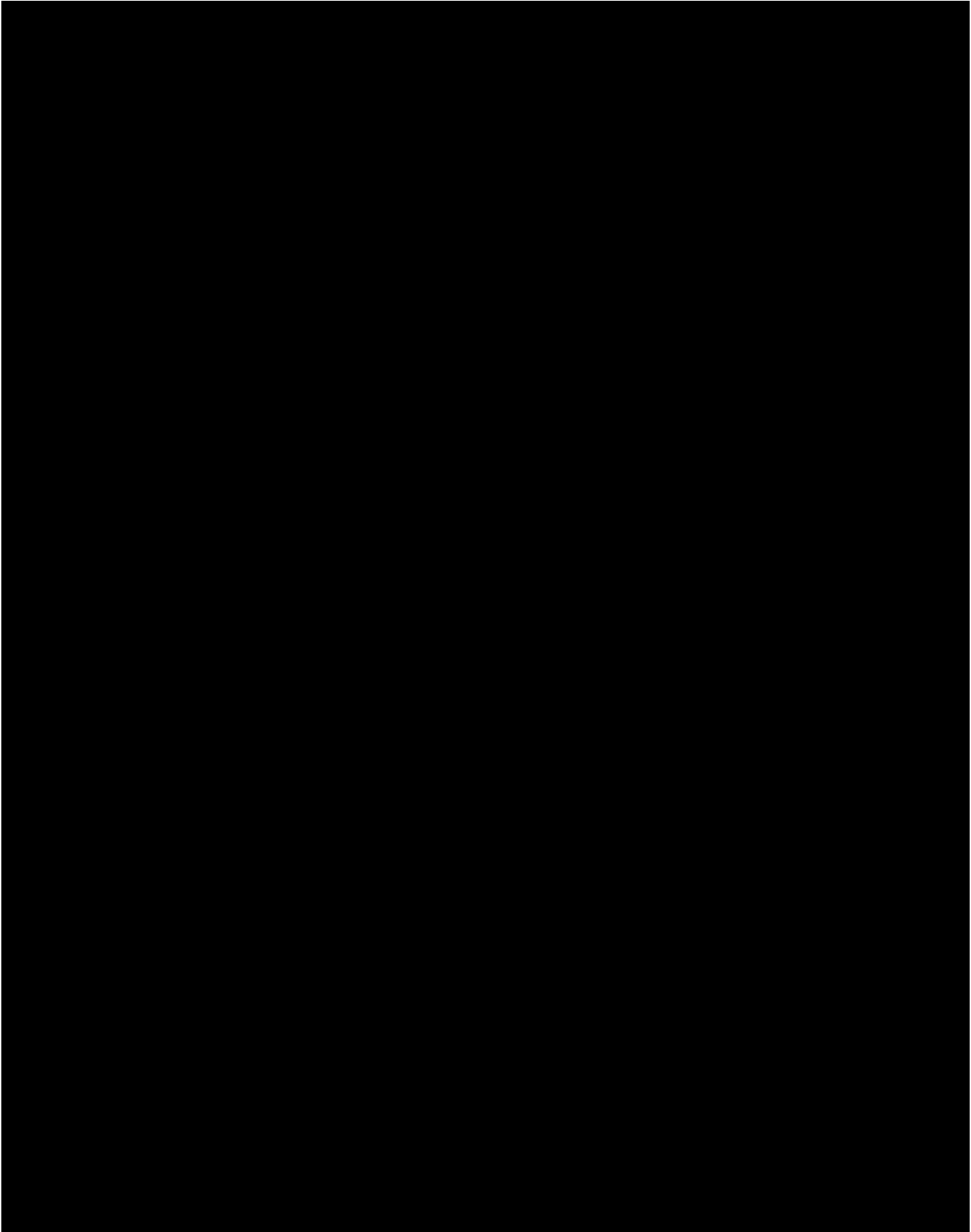












KAMBI INTERNAL CONTROLS

5330.8 Internal controls for mobile sports wagering

(a) Submission. Each mobile sports wagering licensee shall submit to the commission, for approval, internal controls for all aspects of mobile sports wagering operations prior to commencing operations. The submission of internal controls shall be organized to correspond to the subdivisions set forth in this section.

(b) System requirements. Internal controls for system requirements shall address:

(1) user access controls;

The Kambi Access Control and User Management Policy controls and regulates how access to the sports betting platform, networks and physical locations is granted, reviewed and revoked.

[REDACTED]

The Kambi Access Control and User Management Policy will be included with the final version of this document following publication of approved regulations.

(2) a description of segregation of duties;

[REDACTED]

[REDACTED]

[REDACTED]

Event Creation / Event Settlement

[REDACTED]

Organizational Design

From an organizational perspective, Kambi has functional separation between the key groups within the trading team. The three discrete groups are:

Trading

The Trading team [REDACTED]
[REDACTED]
[REDACTED]

Risk and Player Analytics (Risk)

The Risk team is [REDACTED]
[REDACTED]
[REDACTED]

Sportsbook Control (SBC)

The SBC team [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Factorial separation (Integrity in offering)

[REDACTED]

Individual separation (Integrity in risk management decisions)

[REDACTED]

[REDACTED]

Kambi's Customers

All of Kambi's customers are separate entities to Kambi itself. Because of this, there is a natural separation in place across the full scope of business operations, including but not limited to, the physical and online environments.

In the trading environment, [REDACTED]

Conversely, Kambi's customers [REDACTED]

(3) procedures for identifying and reporting fraud and suspicious conduct or activity;

The Kambi Sportsbook Control team enact [REDACTED]

The Sportsbook Control team work [REDACTED]

The Kambi Sports Integrity policy will be included with the final version of this document following publication of approved regulations.

(4) procedures to prevent sports wagering by patrons prohibited from sports wagering;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(5) a description of all integrated third-party systems;

[REDACTED]

(6) procedures on how to maintain the integrity of sports wagering platforms, authorized sports bettor's data and sports wagering data storage in the case of a system failure;

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(7) description of the secure method to control remote access to the sports wagering platform using firewalls or other protections and maintaining secure logs;

The Kambi Access Control and User Management Policy controls and regulates [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(8) all data sources used in sports wager determination. Official data from a sport’s governing body shall be used to determine all sports wagers, unless a skin demonstrates to the satisfaction of the commission that sports wagers for such sports wager type may be determined reliably, accurately and timely by an alternative data source. See Racing, Pari-Mutuel Wagering and Breeding Law section 1367(14);

As referenced in the control regarding 5330.8 b.5, a description of all integrated third-party systems, [REDACTED]

[REDACTED]

(9) the method in which the mobile sports wagering licensee shall implement the statewide voluntary self-exclusion database and other prohibited sports bettors into its system; and

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(10) where the mobile sports wagering licensee plans to list, on a website or mobile application, information concerning assistance for compulsive play in New York State, including a toll-free number directing callers to reputable resources, free of charge to the caller.

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(c) Authorized sports bettor account requirements. Internal controls for authorized sports bettor account requirements shall address:

(1) controls in place to limit each authorized sports bettor to one active account per skin, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367-a(4)(a)(i);

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(2) the multi-factor authentication method to be used;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(3) the mechanism for an authorized sports bettor to establish daily, weekly or monthly deposit limits, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367-a(4)(a)(xii);

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(4) controls in place to prohibit anyone under the age of 21 from participating in mobile sports wagering;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(5) the mechanism, if any, the platform provider or skin will use to create a wallet to be used by authorized sports bettors across multiple skins associated with such platform provider;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(6) the systems and procedures in place to maintain the security of authorized sports bettors' accounts, including the encryption of personally identifiable information and biometric data, Social Security number, account personal identification number and/or password and methods of account funding;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(7) how the mobile sports wagering licensee intends to meet all requirements set forth in section 5330.4 of this Part;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(8) procedures for issuing a form W-2G, if such thresholds are met;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(9) procedures for authorized sports bettors to obtain a year-end win-loss statement;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(10) the mechanism for allowing an authorized sports bettor to close an account;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(11) a procedure for when an authorized sports bettor's lifetime deposits reach \$2,500, and every year thereafter, for such bettors to acknowledge the bettor has met the deposit threshold and may elect to establish limits or close such account and that the bettor has received disclosures that include problem gaming resources, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367-a(4)(a)(xiii); and

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(12) how a dormant account is defined and what the process is for reconciliation of such accounts.

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(d) Prevention of circumvention of sports wagering amount acknowledgments. A skin shall provide the acknowledgment set forth in paragraph (11) of subdivision (c) of this section whenever such skin knows or should know that an authorized sports bettor has taken or is attempting to take action designed to circumvent the monetary threshold set forth in such paragraph.

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(e) Operational requirements. Internal controls for operational requirements shall address:

(1) a description of how the skin intends to segregate sports bettors' funds from operating funds;

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(2) procedures to ensure no sports wagering shall be based on a prohibited sports event;

Kambi currently handles operational compliance requirements across more than 35 regulated markets worldwide. As such, sophisticated technical and organizational responses have been developed to handle the regulatory filtering of sporting events for wagering across such diverse environments.

[REDACTED]

[REDACTED]

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

[REDACTED]

(3) a description of anti-money laundering compliance standards;

Monetary transactions, namely deposits and withdrawals, are managed by the Operator / Player Account Management system who own the associated responsibilities regarding transactional AML standards. [REDACTED]

[REDACTED]

Kambi's own anti-money laundering compliance standards are included in the appended [AML/CTF & Suspicious Transactions Policy].

(4) a description of the monitoring system that identifies and reports suspected structured sports wagers and unusual or suspicious wagering activity;

Please refer to [answer to § 5330.8 (b) (3) above]

(5) procedures in place to ensure no sports wagering shall be based on a prohibited sports event;

Please refer to [answer to § 5330.8 (e) (2) above]

(6) procedures for the skin reconciling gross gaming revenue and remitting such amount to the platform provider for the payment of taxes and fees to the commission; and

Adherence to this section of the regulations is under the exclusive control of the Operator and their vendors.

(7) in the event of changes and upgrades to the mobile sports wagering server or other hardware and software used to execute mobile sports wagering, procedures the mobile sports wagering licensee intends to follow in order to receive approval from the commission, including recertification of such sports wagering components.

The Kambi sportsbook platform online will be certified by an independent test laboratory prior to launch.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(f) Geolocation requirement. Geolocation software used by mobile sports wagering licensees shall be approved by a licensed independent testing laboratory, including applicable field testing, before the software is deployed in this State. Internal controls for geolocation requirements shall address:

(1) how the licensee shall ensure that authorized sports bettors shall be physically located within the State of New York when engaging in mobile sports wagering;

The response to this section of the regulations to be determined by the Operator.

(2) which geolocation system will be used to reasonably detect the physical location of an authorized sports bettor attempting to place a sports wager with the skin and block unauthorized attempts to access the licensee's platform throughout the duration of the wagering session;

The response to this section of the regulations to be determined by the Operator.

(3) how the geolocation system will detect any mechanisms a bettor may use to circumvent the requirement that the bettor be physically located within the State of New York;

The response to this section of the regulations to be determined by the Operator.

(4) how the geolocation system ensures the integrity of the bettor's account and the bettor's device by blocking sports wagers from devices that indicate tampering; (5) how the skin will discover and update the internet protocol address of the bettor if such changes during a session and how physical location would then be detected;

The response to this section of the regulations to be determined by the Operator.

(5) how the system shall block any attempt to make a sports wager the geolocation software determines is being attempted from a physical location outside of the State of New York; how, in such event, the system shall log any identifying information relating to such attempt; and how such information shall be made available to the commission upon request;

The response to this section of the regulations to be determined by the Operator.

(6) how the geolocation system shall alert the mobile sports wagering licensee of potential risks and fraudulent activity and grant the licensee and the commission access to real-time data feeds of geofencing feeds and potential risks; and

The response to this section of the regulations to be determined by the Operator.

(7) how the skin shall ensure that a mobile sports wagering vendor license is obtained by any geolocation vendor.

The response to this section of the regulations to be determined by the Operator.

Other Platform Provider requirements necessitating documented controls:

§ 5330.10. System requirements for mobile sports wagering.

(c) Platform provider requirements. The systems of a platform provider shall be able to provide the following, at a minimum:

- acceptance and registration of all sports wagers;
- generation of all electronic sports wagering tickets;
- computation of sports wagering and payoffs;
- maintenance of records of all sports wagering activities;
- generation of all reports;

(6) maintenance of the integrity of sports wagering platforms, authorized sports bettors' data and sports wagering data storage in the case of a system failure, using methods outlined in the approved internal controls of the platform provider;

Please refer to [answer to § 5330.8 (b) (6) above]

(7) creation of a secure method to control remote access to the platform using firewalls or other protections and maintenance of secure logs outlined in the approved internal controls of the platform provider;

Please refer to [answer to § 5330.8 (b) (7) above]

§ 5330.29. Gross gaming revenue reports and reconciliation.

(b) Daily gross gaming revenue. A platform provider's accounting department member shall determine the daily gross gaming revenue amount as set forth in such platform provider's internal controls. Each skin shall also detail the reporting mechanism to the associated platform provider in such skin's internal controls.

[REDACTED]

[REDACTED]