

SUB BINDER 2

Part 6 – Applicant Technical Proposal

PLATFORM PROVIDER APPLICANT TECHNICAL
PROPOSAL

**Application of Rush Street Interactive
NY, LLC**

JOINT BID CONSORTIUM

Primary Applicant

Kambi

Applicants

CAESARS.
SPORTSBOOK **POINTS**BET

 Resorts World™

RUSH STREET
INTERACTIVE **wynn**BET

New York State
Gaming Commission

Request for Applications for Mobile Sports Wagering
Platform Providers

**PART 6 - APPLICANT
TECHNICAL PROPOSAL**



August 2021

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PART 6 – APPLICANT TECHNICAL PROPOSAL

6.1 EXPERIENCE

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

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

Please see Exhibit D - Kambi

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

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

RSI has first listed each of the markets it operates, and then highlighted three (3) of the most comparable Sports Wagering operations with more detailed examples in the sections that follow.

• the jurisdictions where the Operators is licensed and operating;

RSI is currently operating in the following jurisdictions. The products we offer in each of these jurisdictions are explicitly legal and locally licensed, taxed and regulated.

- Illinois (online sportsbook, retail sportsbook)
- Pennsylvania (online sportsbook, online casino)
- Colombia (online sportsbook, casino)

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- New Jersey (online sportsbook, online casino)
- New York (retail sportsbook)
- Indiana (online sportsbook, retail sportsbook)
- Colorado (online sportsbook)
- Michigan (online sportsbook, online casino, retail sportsbook)
- Iowa (online sportsbook)
- Virginia (online sportsbook)
- West Virginia (online casino)

• wagering volume of Sports Wagering;

Here is an analysis of the jurisdictions that RSI operates in that are most comparable to New York. In the case of each of Illinois and Pennsylvania, RSI-affiliated Rivers casinos in those states generate the most retail sports betting revenue in their respective states, have large databases and generate meaningful revenue.

Although the above factors were in place in both states, it was RSI's ability to offer a market-leading player experience to customers already in the database and previously-unknown customers alike. In other words, there are many other operators that have strong databases/brands that have not performed as well as RSI has done when a strong database/brand is present. RSI, because of its nimble culture and because of owning its own proprietary online gaming platform that connects to the Kambi sportsbook, was able to mobilize quickly and launch first in both markets.

Note: Pennsylvania is the only state that discloses the amount of promotional credits that each operator provides to customers.

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RSI is offering promotional credits approximately 25% less than the market average rates as a % of GGR showing the strength of RSI's player experience and are not just chasing bonus offers.

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Players are loyal to RSI's sites/apps because we treat the players well and offer a top rated user experience, not because we aggressively bonus players at extreme and long-term unsustainable levels.

In addition, RSI is also #3 out of 19 operators in Colombia in online sports betting. We launched in Colombia without a local brand or database or even a local partner. In fact, we didn't even have employees at the time who spoke Spanish before we decided to enter that market since it was the only country at the time in all of the Americas where online sports betting was explicitly legalized, regulated, and where we could operate under a local license that paid taxes locally. Yet, despite having no advantages, RSI has grown its revenues consistently and fast and has now become a respected market leader while still operating profitably.

RSI Online/Mobile Sports Betting Volume (Trailing 12 Months)

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- Illinois - \$1,040,345,797
- Pennsylvania - \$468,239,880

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• estimated market share within each jurisdiction:

RSI Online/Mobile Sports Betting Volume Market Share (Trailing 12 Months)

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- Illinois - 23.5%
- Pennsylvania - 9.1%

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• the Platforms currently used to accept wagers; and

RSI has a multi-state license agreement in place with our sportsbook supplier (Kambi) for the pricing, trading, and risk management functions of the sportsbook solution.

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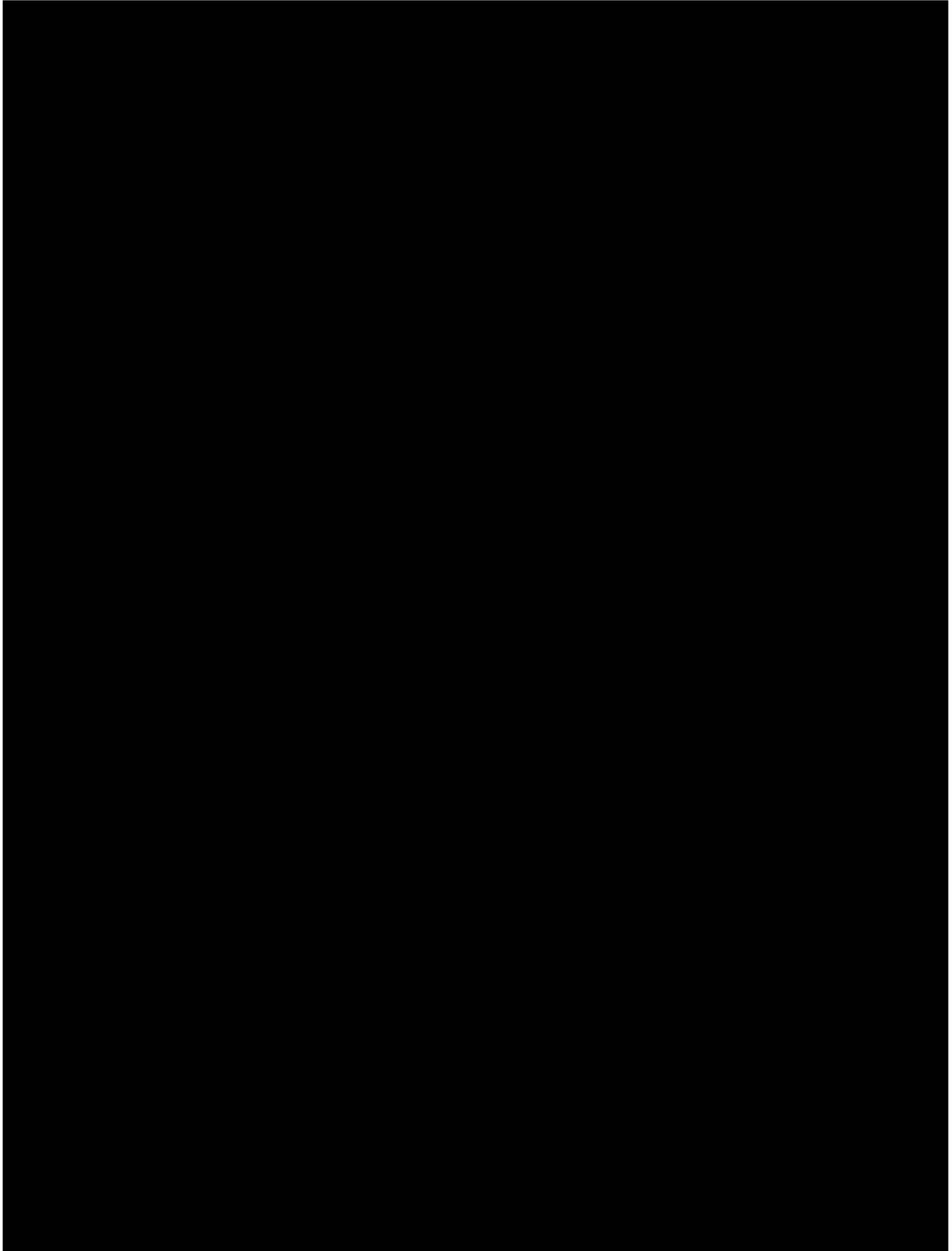
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Full Serviced Sportsbook Solution

- Full Pre match and live offering
- 24/7 Risk monitoring and management
- Event settlement
- Risk management & fraud prevention
- Customer profiling service
- Technical integration with RSI
- Hosting and 24/7 technical support
- Streaming integration and management
- Continuous product development
- APIs for reporting
- Dedicated Partner Success Management and 24/7 operational support
- Leading Online Gaming Platform Supplied through RSI

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

- RSI is an online pure play market leader today with an emphasis on innovation, technology, player experience & customer service
- RSI was #3 in US online sports betting revenues (CY2020) while having marginally positive EBITDA compared to the #1 and #2 operators who combined for a \$633M EBITDA loss
- RSI was #1 in online gaming revenues in CY2020 in the two most populous states (PA & IL) that legalized online gaming, proving we can beat Daily Fantasy Sports (DFS) brands head-to-head when we use a local casino brand like we will have the opportunity to do in New York.
- RSI has market leading player conversion & retention rates, long-term values and ARPU (avg. revenue per user)
- RSI is a suitable and reputable operator that has never operated in any black or grey markets (real money or DFS), only 100% legal and regulated markets where we pay local taxes
- RSI grew revenue by 218% year-over-year to \$112MM in 1Q21 (grew 337% year-over-year in 2020)
- Increased our FY2021 revenue guidance to \$440MM-480MM (consistently beaten and raised Wall Street guidance)
- RSI has a strong balance sheet with over \$360 million in cash & No debt since going public (NYSE: RSI) at the end of 2020
- ARPU grew 21% in 1Q21 over 1Q20 to \$302
- RSI mobile sportsbook app was very recently and independently rated #4 by Eilers & Krejcik out of 31 apps in the US market (JULY 2021)
- RSI won the coveted eGaming award, the industry's gold standard, for Customer Service Operator of the Year in 2020 & 2021, reinforcing the quality of our user experience and focus on treating customers well. .
- Top 3 US Operator in EGR's US Power 50 Rankings 2020, outlining the most powerful companies in the US market.
- 'Digital Operator of the Year' at the Global Gaming Awards Las Vegas 2020
- 'Casino Operator of the Year' at the EGR North America Awards 2020 & 2021
- 'Social Gaming Operator of the Year' at the EGR North America Awards 2021
- 'Mobile Operator of the Year' at the EGR North America Awards 2019
- 'American Operator of the Year' at the American Gambling Awards 2019
- 'Casino Operator of the Year' at the American Gambling Awards 2019
- 'Marketing Campaign of the Year' at the EGR North America Awards 2018
- #1 operator of a commercial retail sportsbook in New York (CY 2020)
- #1 operator of retail sportsbooks in Pennsylvania (CY 2020)

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- #1 operator of retail sportsbooks in Illinois (CY 2020)
- #1 operator of online sportsbooks in Illinois (CY 2020)
- #1 operator of online gaming (sports & casino) in Pennsylvania (CY 2020)
- #1 in online casino revenue in the U.S. market (Q1-Q3 2020)

6.2 EXPERTISE

Section 6.2.A – Summary on Behalf of All Platform Provider Applicants

Our Platform Provider Applicants are experts in online and mobile sports wagering. Collectively, our Platforms have over 40 live deployments in regulated U.S. jurisdictions. Our Platforms are also proven globally with some of the world's largest online and mobile sports wagering operators.

Our Platform Provider submissions for 6.2.A covering the individual Applicants will provide key details on each Platform's technical and Operator support features, operation, support & maintenance capabilities, and differentiating characteristics. We are confident the Commission will conclude that our proposed set of Platforms are:

- Highly scalable, secure, and dependable
- Built to U.S. compliance standards
- Capable of supporting Operator differentiation
- Maintained and invested in by strong organizations

Highly scalable, secure, and dependable

Nothing matters more to a regulated online sports wagering operation than the scalability, security, and dependability of its Platform. Platforms must be built to reliably handle significant traffic during major sporting events such as the Super Bowl. Sports wagering Operators heavily depend on this basic function to earn revenue and retain patrons. All this must be achieved while ensuring robust protection of sensitive patron information. In addition, our platforms are designed for day one market launches, quickly transferring players from the illegal market to the legalized one. All our Applicants have proven their ability to deploy quickly and operate to very high standards in live U.S. environments:

- Kambi's sports wagering platform is active in 6 continents. This global experience highlights the expertise of Kambi's operations, flexible to the consumer needs in any corner of the globe. 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.
- Caesars' Liberty platform was specifically built to be scalable for the U.S. market. It is currently deployed in eight states, with several more expected before the end of 2021. Liberty utilizes modern, modular architecture that is API-driven, and designed to scale and adapt to the regulatory and reporting requirements of each state. It was developed to

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enable quick speed to market and large transaction volumes. The platform includes Caesars' pricing and trading operations, which are also fully owned.

- PointsBet is uniquely positioned as its sportsbook platform is a proprietary, managed technology across all elements, both front and back end. The platform employs a modern code base and is a proven technology in the US sports betting marketplace including across peak days in high volume transaction environments. The company's technology and development teams facilitate agile, custom, quick to market innovation, including all technical regulatory requirements.
- WynnBET's Platform technology, including licensed technology from Scientific Games, has supported the world's largest bookmakers during the world's largest betting events, including the Super Bowl and Cheltenham Festival. It is arguably the most tested betting Platform technology in the world. It has supported over 470 million account transactions and 60K bets per minute during a single major sporting event, all with 100% uptime.

Built to U.S. compliance standards

As noted above, our Platforms have collectively more than 40 live deployments in regulated U.S. jurisdictions. Our consortium has proven its ability to deliver to the demanding specifications of U.S. regulators. Our Platforms are all required to provide for robust patron verification procedures, geolocation requirements, responsible gaming standards, and high levels of security. All our Platforms have been rigorously tested to these requirements and approved by multiple independent testing labs, including the state-run testing lab in New Jersey.

Capable of supporting Operator differentiation

All our Platforms enable an Operator to perform the basic functions of a sports wagering operation reliably and with seamless execution, including: registering and verifying a patron, funding patron accounts, accounting for patron activity, presenting a wide selection of wagering opportunities, offering bonuses and promotions, processing wagers and managing risk, and reporting for business and regulatory needs. However, our Platforms go well beyond meeting basic Operator needs. Each of our Platforms is characterized by differentiating features that position an Operator to excel in growing its market share. Below is just a sample of what each Platform Provider uniquely offers:

- Kambi is 100% focused on being a Sports Wagering Platform supplier and is therefore unique in having a strong and vast network of operators in regulated markets across the world on its platform. The success Kambi delivers is anchored in its ability to leverage its network data from a global player base, creating increased network advantages as each new partner is added and existing partners grow.
- Caesars' Liberty platform is integrated with Caesars Rewards, the largest gaming loyalty program in the country, allowing customers, win or lose, to earn Rewards Credits that be redeemed seamlessly for hotel stays, dining and other experiences at more than 50 properties across the country and for other curated experiences through Caesars' numerous sports and entertainment partners.
- PointsBet's Platform and operator experts excel in many areas but capabilities across the risk management, product innovation, content management and reporting functions are

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specifically notable. The competitive advantages over the long term provided by these unique Platform capabilities which support the Operators accordingly will generate compound returns to the state.

- WynnBET's Platform supports innovative social interaction features and integrates Wynn Rewards, an omni-channel loyalty and bonusing program that will provide New York residents with unmatched access to Wynn's 5-star destination resorts.

Maintained and invested in by strong organizations

The Commission is making a long-term decision for the State of New York and its residents. Given the potential for a 10-year license, our Platform Applicants are well positioned to apply their Platform expertise not just at the time of award but over the long haul. For such a commitment to matter, it needs to come from exceptionally strong organizations that are financially capable of investing R&D into improving and supporting their Platforms. Our Platform Applicants fit this profile:

- Kambi has been publicly traded on First North at Nasdaq Stockholm since 2014. Kambi generated over \$200 million in revenues over the past 12 months and has a strong liquidity position with over \$100 million of cash on balance sheet.
- Caesars, which acquired William Hill, is the nation's largest casino-entertainment operator maintaining approximately \$3.2 billion of cash and revolving borrowing capacity.
- PointsBet is publicly traded with \$501M of cash and no corporate debt which positions it to continue investing aggressively in its technology and product enhancement.
- WynnBET is majority owned and controlled by Wynn Resorts. Wynn Resorts maintains \$4 billion of liquidity globally with an additional ~\$640 million available to WynnBET upon closing its recently announced de-SPAC transaction.

We have a great deal of confidence in our Platform Applicants' expertise in online and mobile sports wagering. Our collection of proposed Platforms in aggregate is the most proven at scale in the world. We have extensive expertise in deploying our Platforms and supporting them in U.S. markets to meet the most demanding regulatory standards. We hope the Commission develops the same confidence in our collective abilities as we frame our independent Applicant profiles and responses in the remainder of section 6.2.A.

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

Please see Exhibit D - Kambi

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

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Experienced gaming operators Neil Bluhm and Greg Carlin, who had successfully developed and operated six large-scale destination casinos (including the casino with #1 revenue per gaming position in the United States) teamed up with online gaming industry veteran Richard Schwartz, architect of the online gaming business for WMS Gaming (now Scientific Games), to co-found RSI in 2012. In effect, RSI combines the vision behind the successful Rivers Casinos and real estate development experience with years of examining and understanding what US gamblers and bettors expect and want from their gaming experiences.

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In 2014, RSI acquired the source code that served as the starting point for its online gaming and sports betting platform, and since then RSI has continued to develop, improve and support it with a talented and industry experienced in-house product development team.

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RSI began offering online casino in the US using this platform in September 2016. Following the lifting of the federal restrictions on sports betting in May 2018 as a result of the U.S. Supreme Court's repeal of the Profession and Amateur Sports Protection Act of 1992 ("PASPA"), we began offering online sports betting.

RSI was founded with the vision to become a leading online gaming and entertainment company that focuses primarily on online sports betting and casino in the Americas. Our mission is to provide our customers with the most player-friendly online sports betting and casino experience in the industry, reducing player friction points at every opportunity. In furtherance of this mission, we strive to create an online community for our players where we are always transparent and honest, treat our players fairly, show them that we value their time and loyalty, and listen to and react to feedback. We also endeavor to, and have implemented, industry leading responsible gaming practices and provide our customers with a cutting-edge online gaming platform and exciting, personalized offerings that enhance the user experience. We automate many features so players benefit from reduced friction.

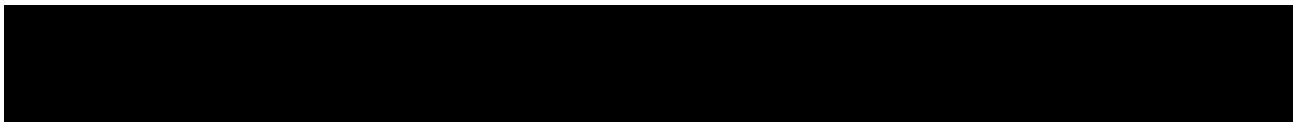
Currently, we offer a combination of real-money online sports betting, retail sports betting, and online casino in ten U.S. states, and internationally in Latin America (Colombia). In 2020, **RSI generated the third most online gaming revenues (combined sports betting and casino) of any operator in the US.**

- #4 operator of online sports betting in the US in 2020
- #1 operator of online sports betting in Illinois in 2020.
- #1 operator of commercial retail sportsbooks in New York, Illinois and Pennsylvania in 2020
- #1 operator of online gaming in Pennsylvania (combined online casino and online sportsbook) in 2020

Strong Market Share - Especially in Jurisdictions with Affiliated Land-Based Casinos.

Where Affiliates of RSI own and/or operate land-based casinos and where RSI will have access to cross-market with the land-based casino and the land-based casino's database, leverage the casino's brand(s) as will be the case in New York. As discussed in our response to 6.1B, RSI has performed extremely strongly in online sports betting in Illinois and neighboring Pennsylvania as examples where these conditions have been in place.

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Award Winning. Furthermore, RSI is routinely recognized by our industry in the following categories:

- “Customer Service Operator of the Year” 2021 North America EGR Awards. One EGR Awards judge expressly acknowledged that RSI “clearly puts customers at the core of what they do.”
- Digital Operator of the Year’ at the Global Gaming Awards Las Vegas 2020
- Top 3 US Operator in EGR’s US Power Rankings 2020

RSI was recognized by the respected and independent industry publication, Gaming Intelligence, for having achieved the largest year over year growth (337%) during calendar year 2020, more than any other gaming company across the globe. “Rush Street Interactive tops the GIQ20 by a mile with an astonishing 337% rise in revenue from \$63.7m in 2019 to \$278.5m in 2020. To achieve this without any M&A, as second-place Flutter and third-place DraftKings have done is a remarkable achievement.” - Gaming Intelligence.

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Nimble and Fast-Moving. Because of our ownership of our platform, our nimble culture and our willingness to collaborate with regulators, we have been first to launch online sports betting in five states.

Built for the Long Run. At the end of Q1 2021, RSI had \$370 million of cash on its balance sheet with no debt. Unlike other operators who also achieved large market shares, RSI’s adjusted EBITDA was marginally positive during 2020 while the other two operators ranked ahead of RSI lost a combined \$633 million. This last point is critical, as over a potential ten-year license term, operators that are currently able to fund market share through large financial losses may not be able to continue to fund these losses if the capital markets sour, which is likely to happen at some point during the license term.

We understand first-hand the hard work from the men and women of New York that has gone into building the New York casino industry, having, through our common controlling ownership with Rivers Casino & Resort Schenectady, successfully delivered upon the state’s vision of creating a casino/resort and sports betting operation in Schenectady. We are invested in New York’s future. Specific to retail sports betting in New York, according to published numbers, RSI has provided services to the consistent #1 retail sportsbook in New York in terms of revenue and in many months has generated the most retail sports revenue as percentage of the host property’s land-based casino GGR of the four upstate casinos.

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

RSI-Kambi integration overview

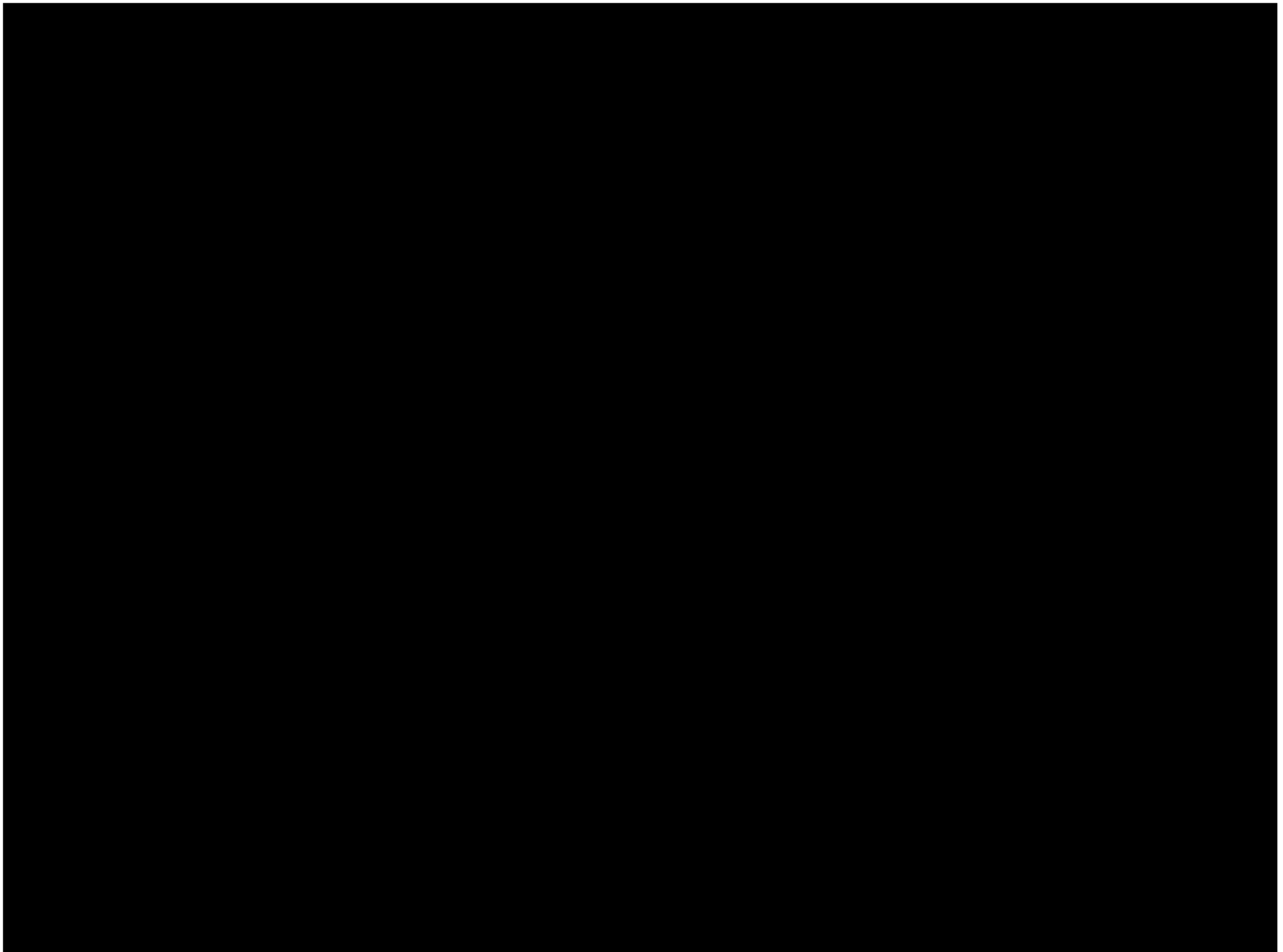
The purpose of this section is to provide an overview of the RSI Online Sportsbook architecture and integration with Kambi Sports Platform.

Component overview

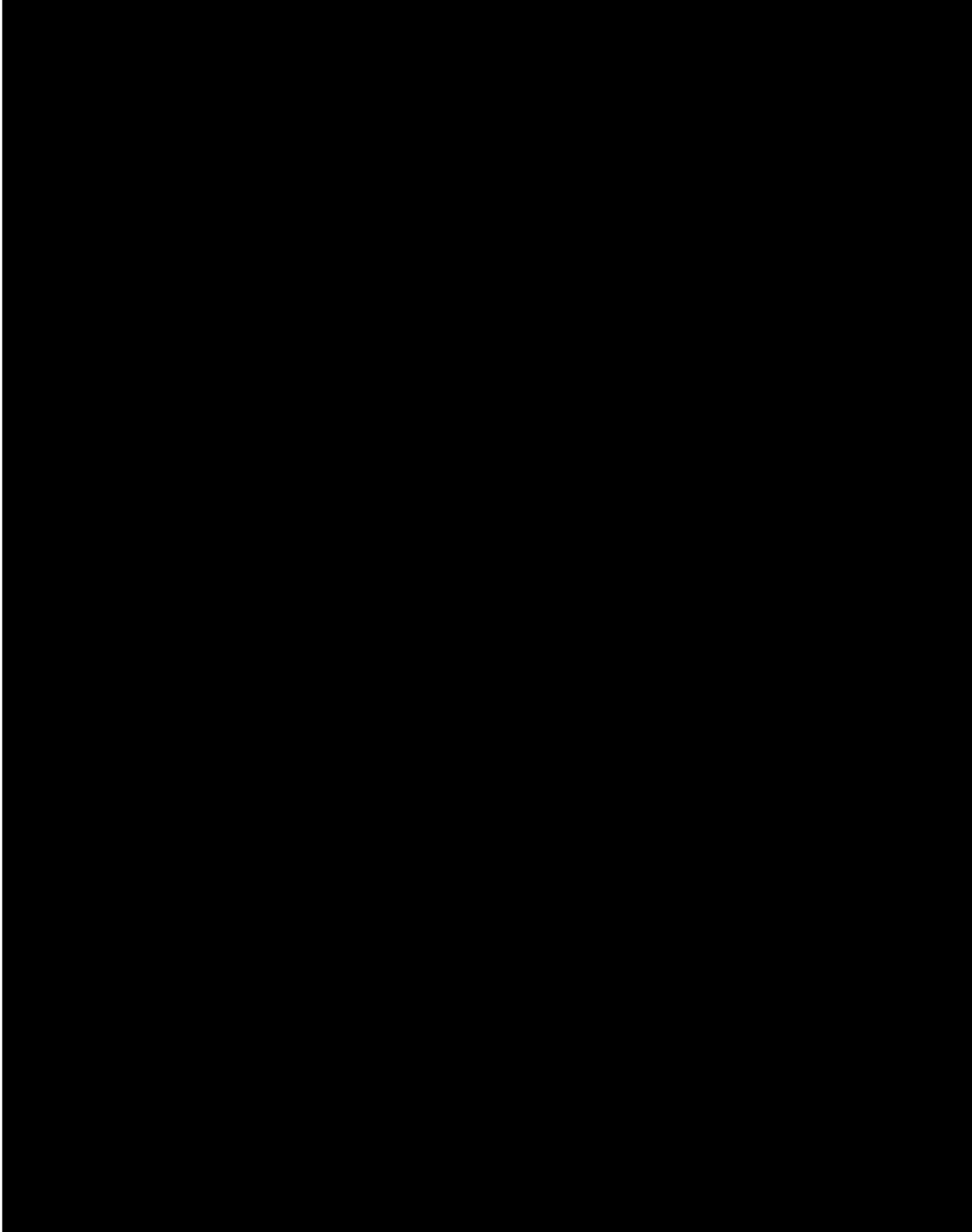
A list of components on RSI and Kambi side with explanations with regards to their purpose.

Key points:

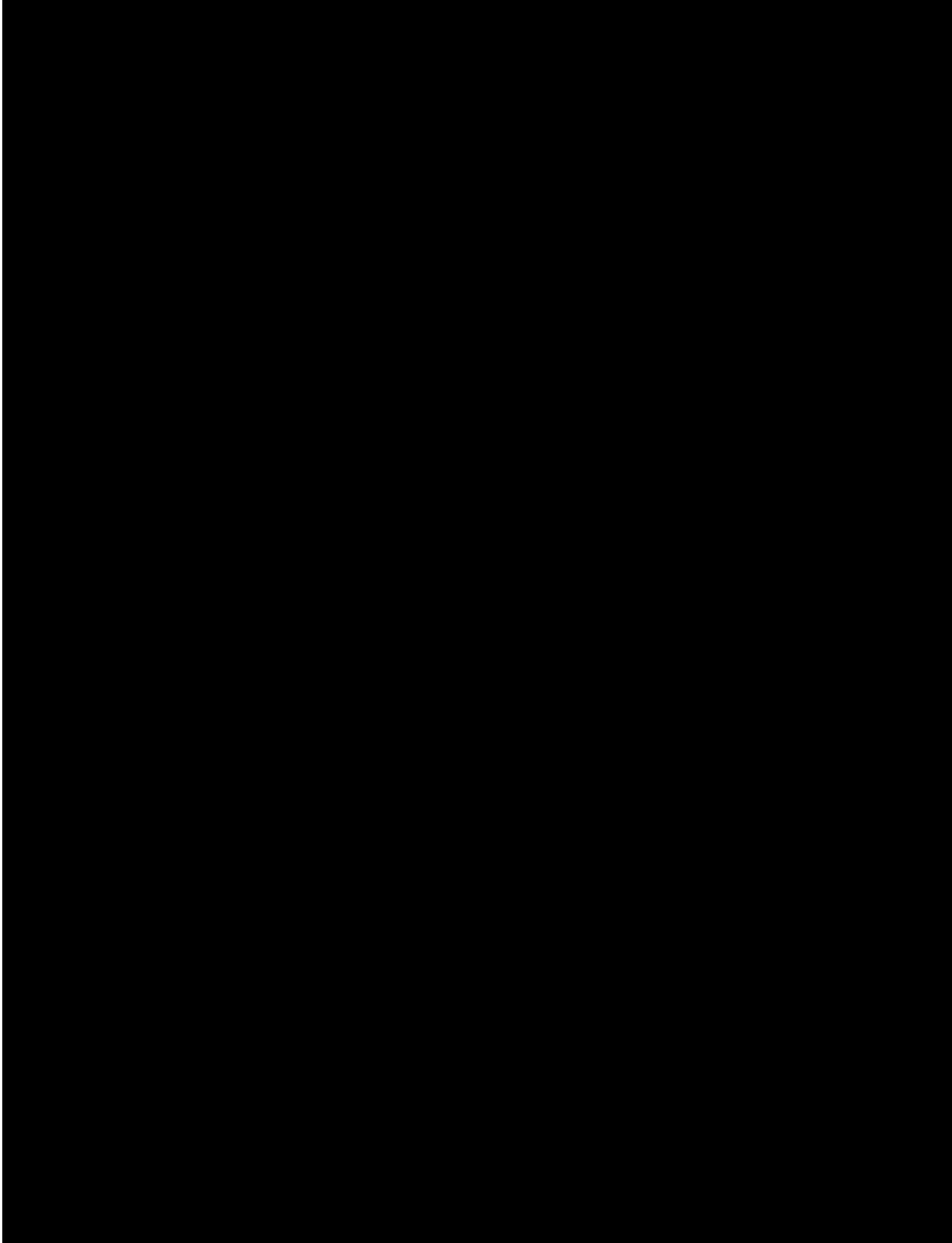
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• an outline of the features offered or used by the Operator that the Applicant believes sets it apart from other potential Applicants;

RSI Platform & Portal Features

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

Event and Market Management

RSI's sportsbook offers markets for more than 80 sports and has the ability to add new sports easily.

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The following is an example of the robust wagering catalog RSI could offer if approved by the Commission. This example is for Football. RSI can provide a complete list for all sports at the Commission's request:

- | | | |
|---|--|---|
| 1. Wager | 9. All teams to win
their matches | minutes of the First
Half |
| 2. 2-Point Conversion
to be Attempted | 10. Any Away Team
Player to Rush for
X+ Yards | 17. At least one play to
be run from yard
line "X" during the
game |
| 3. 3-Way Handicap -
Including Overtime | 11. Any Challenge to
get overturned | 18. Away Team Drive
{0}, To Gain a First
Down {1} |
| 4. A FG to be made
with 00:00 at end
of X period | 12. Any Home Team
Player to Rush for
X+ Yards | 19. Both Players to
Score a TD |
| 5. A New First Down
Earned on Current
Play | 13. Any non QB to
throw a Touchdown | 20. Both Teams to
Score in 1st
Quarter |
| 6. A Safety to be
scored | 14. Any Quarter to end
scoreless | 21. Comeback Player
of the Year |
| 7. A snap to be taken
from X yard line | 15. Any regular season
game to end in a
tie after Overtime | 22. Completion %
Player X |
| 8. A Touchdown to be
Scored in
Consecutive
Possessions | 16. At least 1 point
scored in the final 2 | |

- | | | |
|---|---|--|
| 23. Conference Finishing Position | acks/TD Record will be broken | 63. Longest pass reception: Player X vs. Player Y |
| 24. Conference Winner | 44. Game to go into Overtime | 64. Longest passing play |
| 25. Division Finishing Position | 45. Half Time/Full Time | 65. Longest Punt by team o/u |
| 26. Division Winner | 46. Highest Scoring Half/Quarter | 66. Longest Reception |
| 27. Double Chance | 47. Home Team Drive {0}, To Gain a First Down {1} | 67. Longest Rush |
| 28. Draw No Bet | 48. Jersey Number of First/Last Touchdown Scorer | 68. Longest rushing attempt: Player X vs. Player Y |
| 29. Either team not to Punt | 49. Kick to hit Uprights/Crossbar | 69. Lowest Scoring Gam/Team in Week X |
| 30. Either team to score 3 times unanswered - Including Overtime | 50. Largest lead of the game | 70. Method of 1st Down |
| 31. Either team to win by exactly 3 points | 51. Last Scoring Play | 71. Method of First Score |
| 32. First Pass distance | 52. Last Scoring Team to win | 72. Method of First Touchdown |
| 33. First Play - Away Team Drive {0}, Bet Carries to next play in case of Penalty | 53. Last Successful Field Goal | 73. Method of First Turnover |
| 34. First Play - Home Team Drive {0}, Bet Carries to next play in case of Penalty | 54. Last Team to Score | 74. Missed Extra Point Yes/No |
| 35. First Reception distance | 55. Last Touchdown Scorer (Team/Player) | 75. Money Line |
| 36. First Rush distance | 56. Lead change during X period | 76. Money Line & Over Under |
| 37. First Rushing/Receiving Touchdown Scorer | 57. Lead changes O/U | 77. Most Bench Press Reps by a Player (over/under) |
| 38. First Successful FG | 58. Length of Longest Drive O/U by distance | 78. Most points scored by designated team(s) |
| 39. First Team to Punt | 59. Length of Longest Drive O/U by time | 79. Most sacks by Player in specified games |
| 40. First Team to Score X Points | 60. Longest completed pass to travel in the air | 80. Next Scoring Play |
| 41. First Touchdown Scorer (Team/Player) | 61. Longest Drive Resulting in FG/Punt/TD | 81. Next Successful Field Goal |
| 42. First/Last Team to Score | 62. Longest pass completion: Player X vs Player Y | 82. Next Team to Score |
| 43. Game in which Passing/Rushing/Completion/Kicking Points/Receiving/S | | 83. Next Touchdown (Team/Player) |

84. Number of points scored by Team X's offense (including field goals) in the game
85. O/U – highest seed to make the Super Bowl
86. O/U # of players to attempt/complete a pass
87. O/U # of QB rushing Touchdowns in a match/week/gameday
88. O/U # passing attempts by player "X" on first down
89. O/U onside kick attempts in designated games
90. O/U– total value of seeds to make the Super Bowl
91. Offensive First Down gained for any play starting between {0}:00 - {1}:01 in Quarter {2}
92. OL or DL to Score a TD
93. Opening Kick to be a Touchback (And by Team)
94. Opening Kick to be returned for a Touchdown
95. Outcome of First Pass Attempt
96. Outcome of Next Drive
97. Over Under
98. Over/under total punts in all designated games
99. Play X type (run, pass, sack/other)
100. Player to Complete the Most Passes
101. Player to first reception
102. Player to force a fumble
103. Player to have first Rush for Positive Yards
104. Player to Have Highest Completion %
105. Player to have highest Passer Rating
106. Player to have most Passing Yards
107. Player to have most Rushing & Receiving Yards combined
108. Player to have most Rushing Yards
109. Player to have Punt Result in Touchback
110. Player to make an interception
111. Player to Make Away Team First Reception
112. Player to make first interception
113. Player to Make Home Team First Reception
114. Player to Record First Sack for Away Team
115. Player to Record First Sack for Home Team
116. Player to Record Longest Completed Pass
117. Player to record longest Punt
118. Player to record longest Reception
119. Player to record longest Rush
120. Player to record most Passing/Receiving/Rushing Yards
121. Player to record most Touchdown passes
122. Player to record most Touchdowns
123. Player to score a Defensive Touchdown
124. Player to Score a TD in Both Halves
125. Player to score in Quarter/Half
126. Player to score most Kicking Points
127. Player to Throw First TD

128. Player to throw most Touchdowns
129. Player Total Passing Touchdowns
130. Player Total Passing Yards
131. Player Total Receiving Touchdowns
132. Player Total Receiving Yards
133. Player Total Rushing & Receiving Touchdowns
134. Player Total Rushing Touchdowns
135. Player Total Rushing Yards
136. Player Total Yards of longest Successful Field Goal
137. Player with highest total Kicking Points
138. Player with highest total Passing Yards
139. Player with highest total Receiving Yards
140. Player with highest total Rushing Yards
141. Player with highest total Sacks
142. Player with highest total Touchdowns
143. Player X & Player Y to combine for a Touchdown Pass
144. Player X & Y & Z & etc O/U combined Passing Yards/Rushing Yards/Touchdowns /Tackles/FGs/INTs/ Fumbles
145. Player X Outcome of first pass attempt
146. Player X passing rating
147. Player X to have a longer pass completion than Player Y
148. Player X to record First Sack
149. Player X to record Y RushingReceivingP assing Yards
150. Player X to rush for at least Y yards
151. Player X to score a Touchdown
152. Player X to score Y Rushing/Receiving Touchdowns
153. Player X total Completions
154. Player X total Kicking Points
155. Player X total Pass attempts
156. Player X total Passing Yards
157. Player X Total Receiving Yards
158. Player X Total Receptions
159. Player X Total Rushing & Receiving Yards
160. Player X Total Rushing Attempts
161. Player X Total Sacks
162. Player X Total Tackles
163. Player X Total Touchdown Passes Thrown
164. Player X Total Yards of longest completed Pass
165. Player X Total Yards of longest Punt
166. Player X Total Yards of longest Reception
167. Player X Total Yards of longest Rush
168. Players to combine for over X Passing/Rushing/R eceiving Yards
169. Players to Score over X combined Touchdowns
170. Players X & Y to score Touchdowns
171. Playing Position of

- First/Last
Touchdown Scorer
172. Point
Spread
173. Point
Spread & Over
Under
174. Position of
First/Last TD
Scorer
175. Position to
Complete a Pass
(Position as listed
by NFL.com)
176. Position to
Throw a Pass
(Position as listed
by NFL.com,
example - Punter to
attempt a pass)
177. Result of
Drive X
178. Rushing
attempts by all
players in a
position group
179. Super Bowl
Winner
180. Super Bowl
Winning
Conference
181. Super Bowl
Winning Division
182. Team exact
Final Score
183. Team
Finishing Position
184. Team first
loss
185. Team first
win
186. Team get
First Down on drive
X
187. Team
Number of games
won in season
188. Team to
attempt an Onside
Kick
189. Team to be
shut out
190. Team to
concede least
points
191. Team to
convert a 4th down
192. Team to
have a 0-16 record
193. Team to
have a 16-0 record
194. Team to
have a 19-0 record
195. Team to
have longest Drive
resulting in a Field
Goal
196. Team to
have longest Drive
resulting in a
Touchdown
197. Team to
have Longest Kick
Return
198. Team to
have Longest Punt
Return
199. Team to
have most
successful Field
Goals
200. Team to
have most time of
possession
201. Team to
have the longest
successful Field
Goal
202. Team to
have the most
Punts
203. Team to
make the playoffs
204. Team to
obtain most 1st
Downs
205. Team to
reach the Play Offs
206. Team to
record first 1st
Down
207. Team to
record most
Interceptions
208. Team to
record most Sacks
209. Team to
record the first
Sack
210. Team to
score a 2 point
conversion
211. Team to
score a rushing
touchdown
212. Team to
score a Special
Teams Touchdown
213. Team to
score consecutive
times
214. Team to
score first and win
215. Team to
score first
successful Field
Goal
216. Team to
Score First/Last
Touchdown
217. Team to
score in both

- Halves/every
Quarter
218. Team to score in Quarter X
219. Team to score most points
220. Team to score on current possession
221. Team to score the longest Touchdown
222. Team to score X points or less
223. Team to successfully recover an Onside Kick attempt
224. Team to win both Halves/each Quarter
225. Team to win by X points
226. Team to win most games
227. Team total 1st Downs
228. Team total net Offensive Yards
229. Team total Penalty Yards
230. Team Total Points
231. Team Total Points scored in season
232. Team Total Punts
233. Team Total Rushing Yards
234. Team Total Sacks
235. Team Total Successful Field Goals
236. Team Total Touchdowns
237. Team Winning Margin
238. Team with highest total Interceptions
239. Team with highest total Kicking Points
240. Team with highest total Passing Yards
241. Team with highest total Receiving Yards
242. Team with highest total Rushing Yards
243. Team with highest total Sacks
244. Team with highest total Touchdowns
245. Team with Longest Drive by Distance
246. Team with Longest Drive by Time
247. Team X & Y & Z & etc O/U combined Passing Yards/Rushing Yards/Touchdowns /Tackles/FGs/INTs/ Fumbles
248. Team X lead at any point and lose the game
249. Team X to be tied or in the lead the entire game
250. Teams to contest the Super Bowl
251. Teams to earn Wild Card
252. Teams to win by combined margin
253. Time O/U of first/last scoring play
254. Time that the final play of the game is completed
255. To Lead After Every Quarter
256. To score a Touchdown and Player's team to win the match
257. Total 1st Downs in the game
258. Total combined point spread in Game X/Game Y/Game Z/etc
259. Total Combined Points in Game X/Game Y/Game Z/etc.
260. Total combined touchdowns by specified team
261. Total Completions in the game
262. Total Kicking Points

263. Total Length of Combined Field Goals (O/U)
264. Total matches won
265. Total net Offensive Yards in the game
266. Total Number of Coaches Challenges - Including Overtime
267. Total number of combined wins or losses in one NFL week for Team X, Team Y, Team Z, etc
268. Total Pass Attempts
269. Total Passing Yards in 1st Half
270. Total Passing Yards in 1st Quarter
271. Total Passing Yards in the game
272. Total Players To Attempt A Pass - Including Overtime
273. Total Players To Complete A Pass - Including Overtime
274. Total Players To Make A Reception - Including Overtime
275. Total Players To Throw A Touchdown Pass - Including Overtime
276. Total Points
277. Total points in all NFL games on Day/Week X
278. Total points in all NFL games on Sunday
279. Total points in all NFL games played in the week's schedule
280. Total points in all NFL games starting at 1:00 p.m. Eastern Time on Sunday
281. Total points in all NFL games starting between 4:00 p.m. - 5:00 p.m. Eastern Time on Sunday
282. Total points in all NFL games starting on the same calendar day.
283. Total Points Odd/Even
284. Total Points scored by Conference/Division Teams
285. Total Punts
286. Total Receiving Yards
287. Total Receiving Yards in X Half
288. Total Receiving Yards in X Quarter
289. Total Rushing Attempts
290. Total Rushing Yards
291. Total Rushing Yards in 1st Half
292. Total Rushing Yards in 1st Quarter
293. Total Sacks
294. Total Successful Field Goals
295. Total Tackles
296. Total TD Passes in X Half
297. Total TD Passes in X Quarter
298. Total Touchdown Passes Thrown
299. Total Touchdowns
300. Total Turnovers committed
301. Total yardage of all the TDs
302. Total Yards of First Touchdown
303. Total Yards of Longest Completed Pass
304. Total Yards of longest Punt
305. Total Yards of longest

- Successful Field Goal
306. Total Yards of longest Touchdown
307. Total Yards of shortest Successful Field Goal
308. Total Yards of shortest Touchdown
309. Touchdown to be scored on any play starting between {0}:00 - {1}:01 in Quarter {2}
310. Which team will have the longest play from scrimmage?
311. Which will be higher, Player X Sacks vs. Player Y Touchdowns?
312. Will a kick hit the upright?
313. Will a player playing position X score a touchdown
314. Will any player besides a QB throw a TD?
315. Will any QB throw for more than X touchdowns?
316. Will any QB throw for more than X yards?
317. Will anyone other than a quarterback record a passing attempt
318. Will either team get stopped on 4th down
319. Will either team successfully perform a certain play? [ex: Handoff, Reverse, completed pass]
320. Will Player X attempt a field goal longer than Y yards?
321. Will player X OR player Y have an interception?
322. Will player X or player Y reach Z passing yards first?
323. Will the game be tied again after 0-0?
324. Will the opening kickoff be a touchback?
325. Will there be a drive over X Yards?
326. Will there be a drive over X:XX (Time)?
327. Will there be a flea flicker?
328. Will there be a successful onside kick attempt in designated games (Y/N)
329. Will there be an onside kick attempt in designated games (Y/N)
330. Will there be more than X total punts in all designated games
331. Winning Margin
332. X half 2-minute warning occur with exactly 2:00 on the clock
333. X Number of Listed Players (names to be defined) to score a Touchdown
334. X offensive play from scrimmage-run/pass
335. Total Team X Players To Make a Reception - Including Overtime
336. Total First Downs by X Team - Including Overtime
337. Player to correctly call Opening Kick Off Coin Toss
338. Player To Throw First Touchdown Pass
339. First and last scoring plays to be touchdowns
340. First and last scoring plays to be field goals

- | | | |
|--|--|--|
| 341. Final play of the game to be a quarterback kneel | before achieved in an NFL game? | 349. Outcome of the First Play of the Game |
| 342. A punt to be downed inside the X yard line | 345. Will a team kick a field goal on 4th and goal? | 350. Outcome of the First Play of the 2nd Half |
| 343. A field goal to be made with 00:00 on the clock at the end of quarter X | 346. Team to Punt First | 351. Any Kickoff or Punt to be returned for a Touchdown - Including Overtime |
| 344. Scoring Will the final score be one never | 347. First offensive play from scrimmage in the 2nd half will be | 352. Which team will score the most points on X day? |
| | 348. Opening Kickoff of the 2nd Half to Result in a Touchback | |

Segmentation of Wagers for Football includes: Full Game, Halves, Quarters, Interval: XX:XX - YY:YY, Overtime, Season, Tournament, Playoffs, Team(s) A/B vs. Team(s) C/D, Player(s) A/B vs. Player(s) C/D, Qualifying, Preseason

RSI believes that there is not a revenue-driving sports betting market / event that is not covered by our sportsbook offering. The only limitation is that the availability of each betting market is dependent upon each regulator and associated regulation in each territory.

In-play Coverage

'Instant Betting' is a major factor in our market leading offering that is appealing even to 'casino' customers. Instant Betting is typically 60 seconds markets betting on what will happen next in an event. This is hugely appealing to casino customers who want quick excitement and instant gratification. RSI offers its players a top quality in-play offering and we are dedicated to the continued development of the innovative in-play player experiences.

The below shows RSI's coverage of U.S. sports for In-Play:

Sport/League	Event Coverage	Offers per event	CONFIDENTIAL INFORMATION BEGINS HERE
Football/NFL	100%	150-500+	
Football/NCAA	minimum 600 events		

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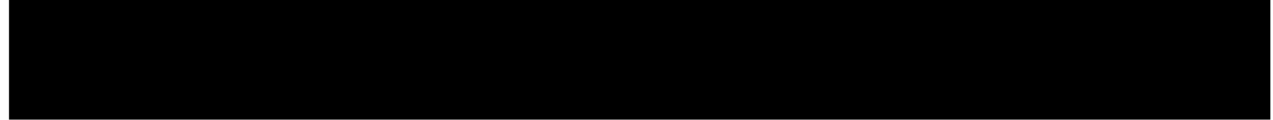
Baseball/MLB	100%	50-100	CONFIDENTIAL INFORMATION ENDS HERE
Basketball/NBA	100%	130-150+	
Basketball/NCAA	3300 Events		
Ice Hockey/NHL	100%	150+	
Golf	100%	5-20	
MMA/Boxing	500 Events	5-20	
Esports	5500 Events	5-20	

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

RSI has a history of launching first in many markets (and virtually every market) where it has had the potential to be first. RSI was the first to launch online sports betting in PA, IL, CO, IN and MI. RSI helped its land-based casino partners launch retail sports betting first in IL and NY.

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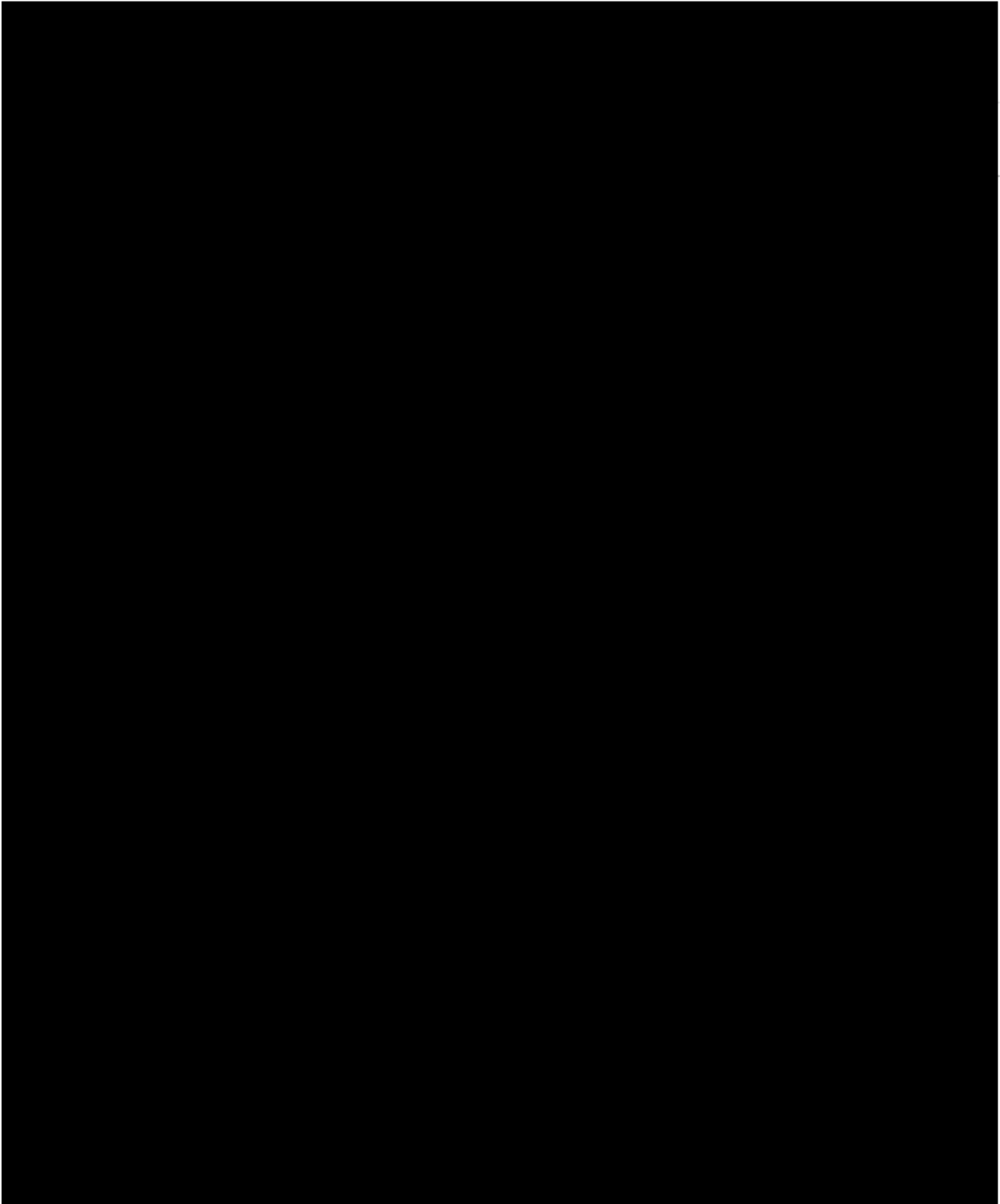
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Attached as Exhibit A is an implementation timeline of the required physical hardware deployment including all Kambi related items covering legal, regulatory, compliance, integration, testing and launch as contemplated for the State of New York.

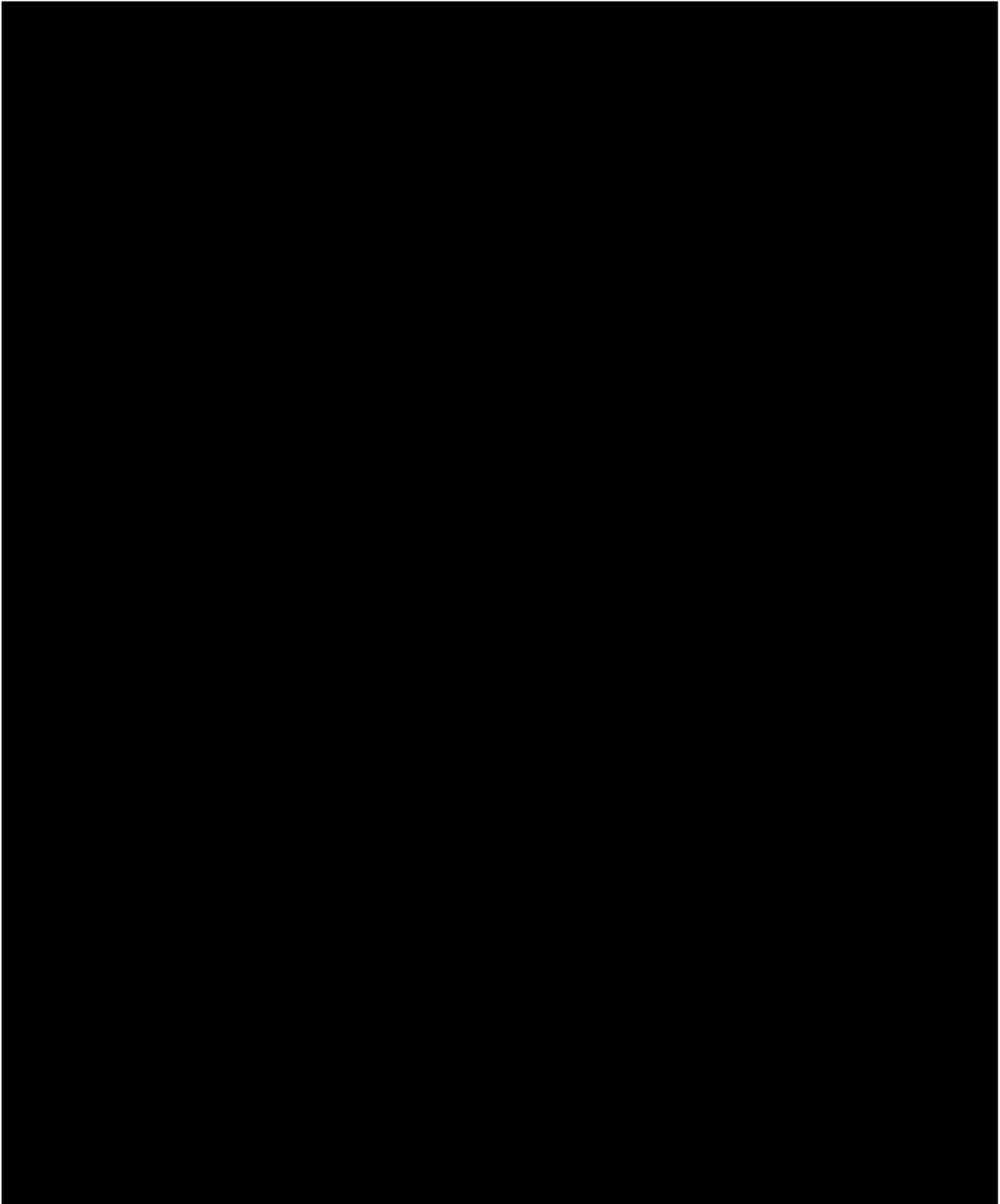
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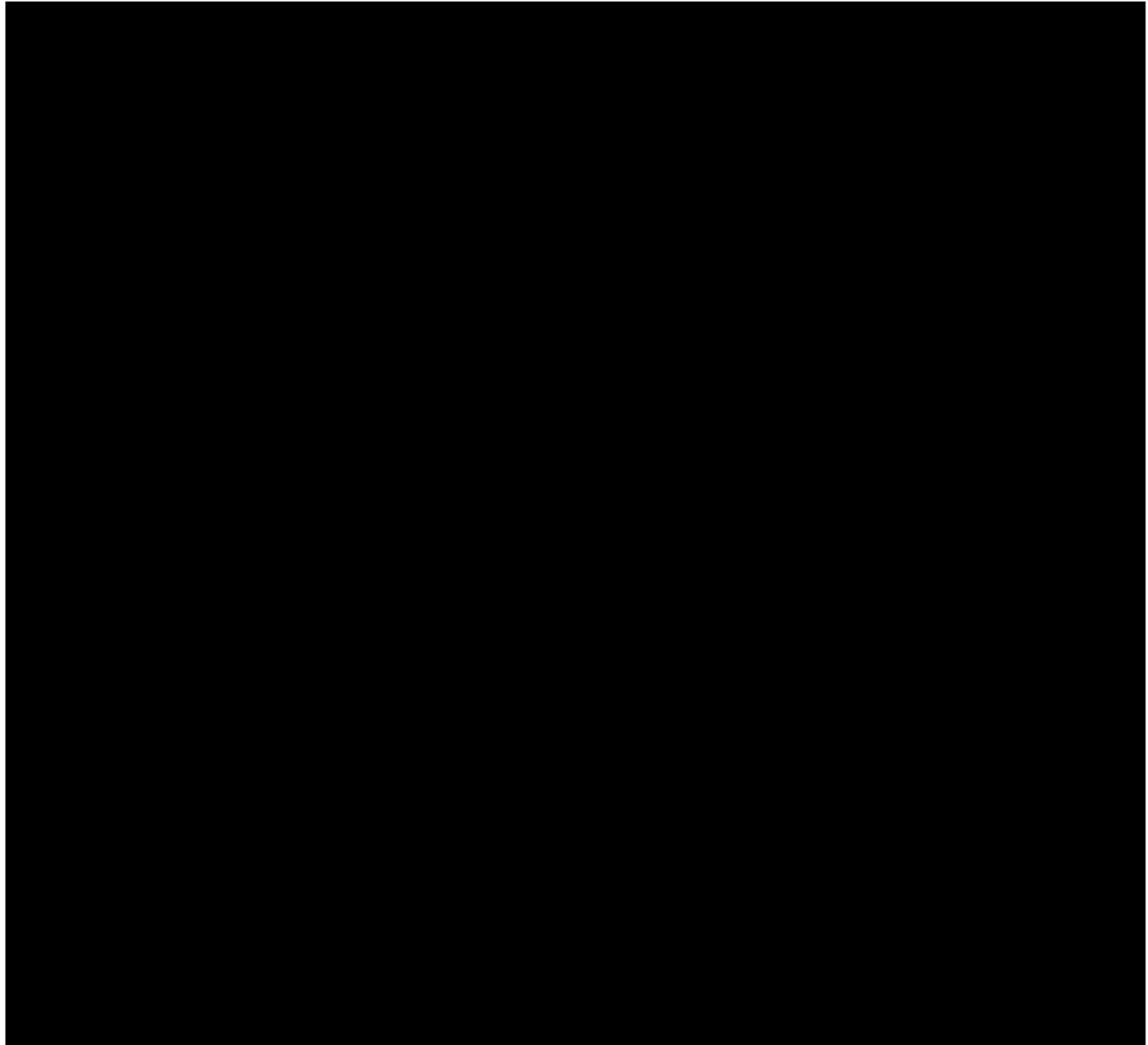
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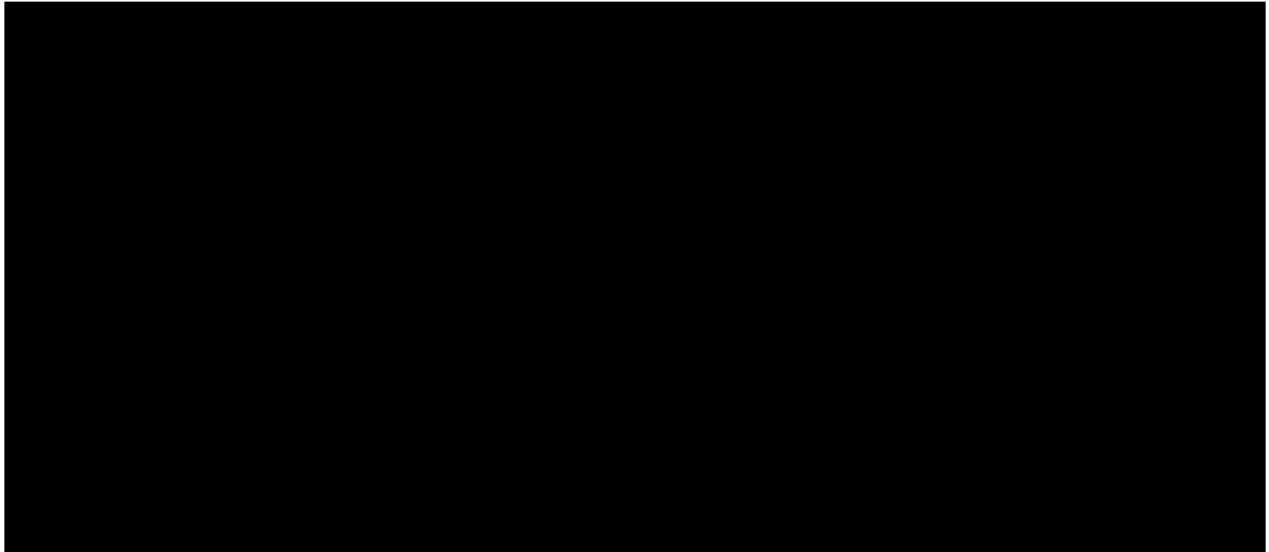
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• additional information the Applicant believes relevant to demonstrate the Operator's expertise, including, without limitation, experience in the field of mobile sports wagering.

Please see the final bullet point of section 6.1B, as RSI believes both its experience and expertise contribute the strong results presented.

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6.3 INTEGRITY, SUSTAINABILITY AND SAFETY

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

Introduction

Kambi is the partner operators like Rush Street Interactive 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

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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.

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.

SECTION CONTAINING CONFIDENTIAL INFORMATION BEGINS HERE

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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.

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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,

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Past posting

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




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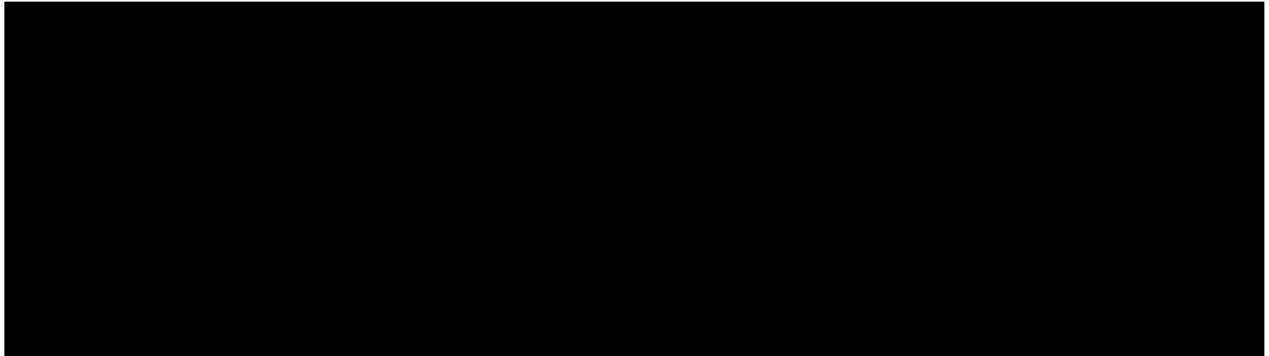
All data sources used in sports wager determination (5330.8(b))

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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



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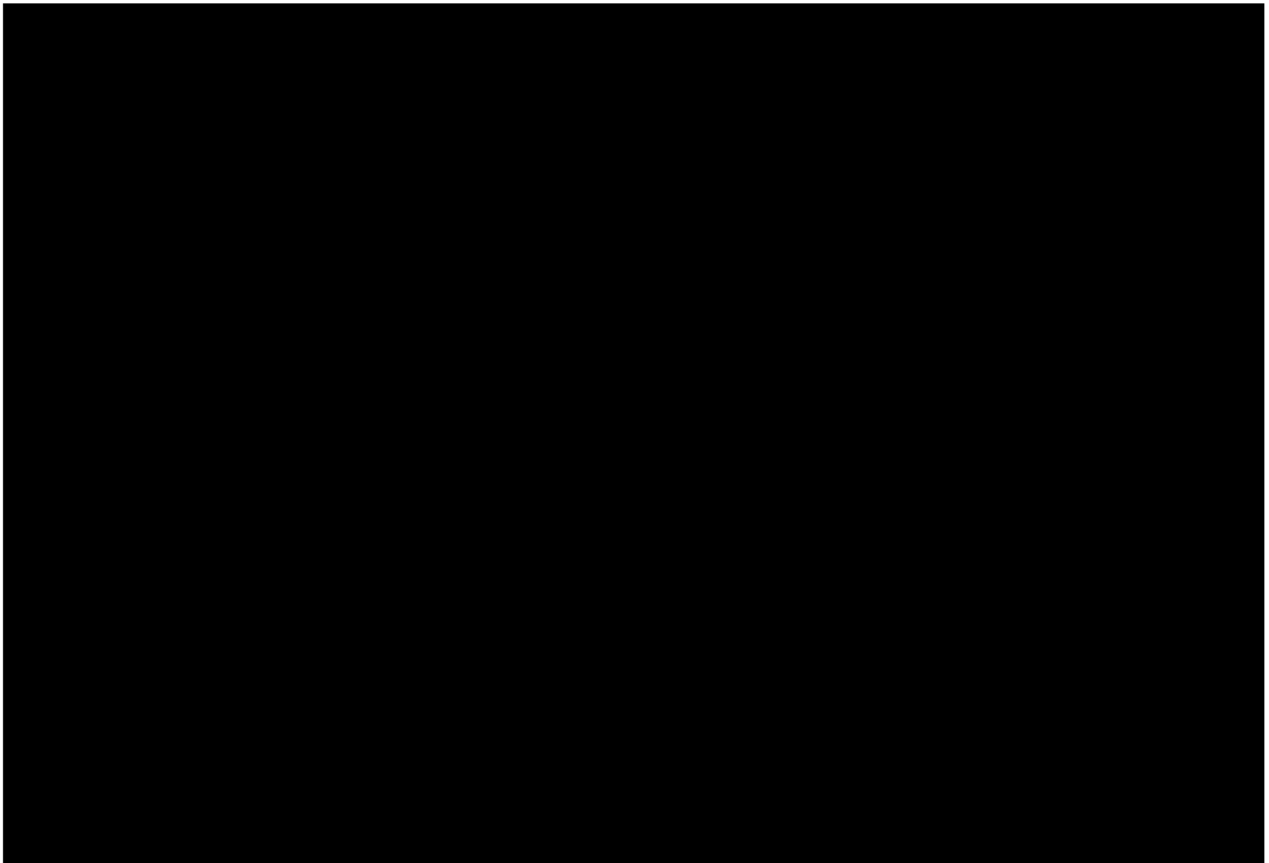
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Submission to laboratory

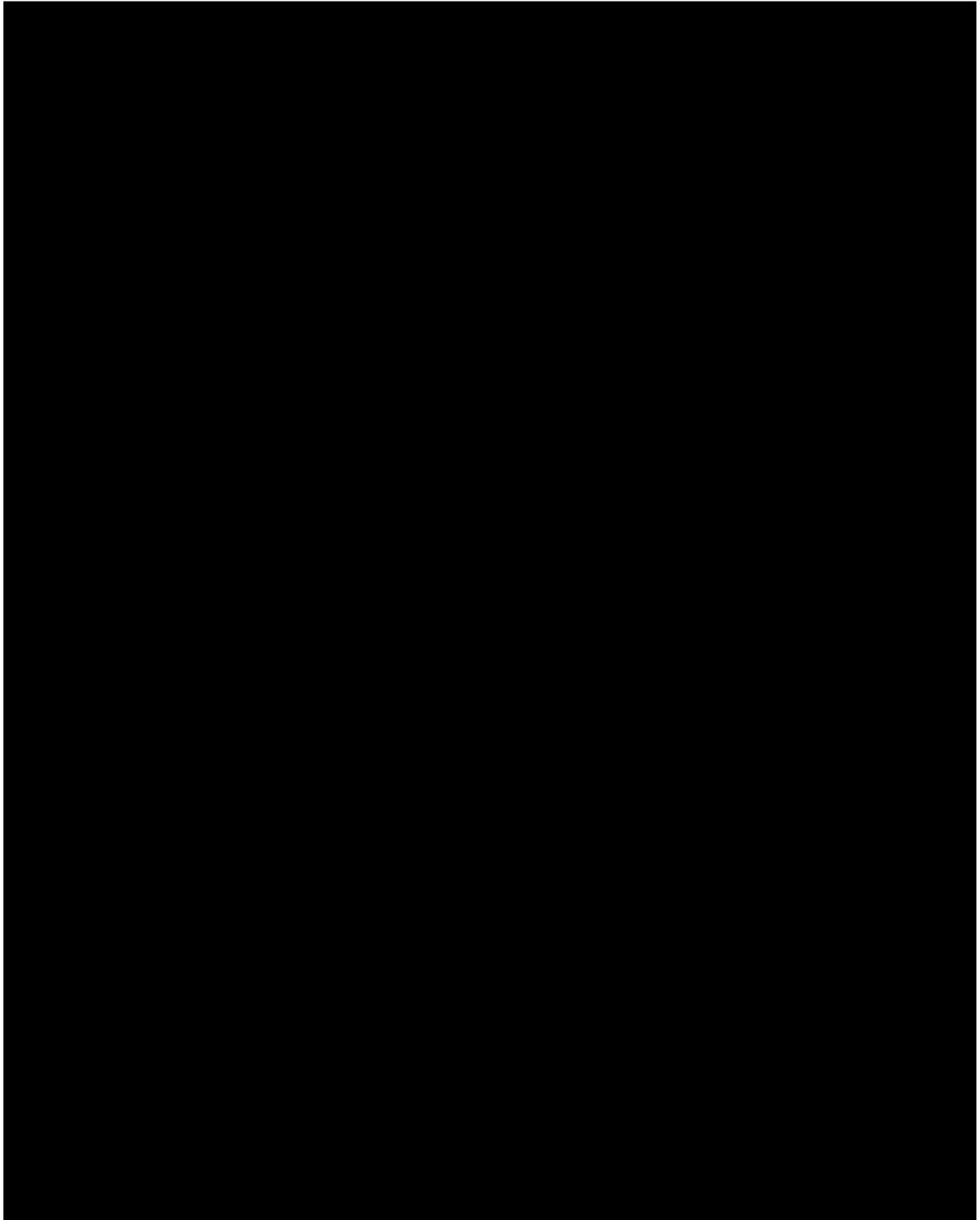
As per 5330.10(a) prior to conducting mobile sports wagering, all Kambi equipment and software used in conjunction with its operation shall be submitted to a licensed independent gaming test laboratory (GLI) for review and approval.

Segregation of duties

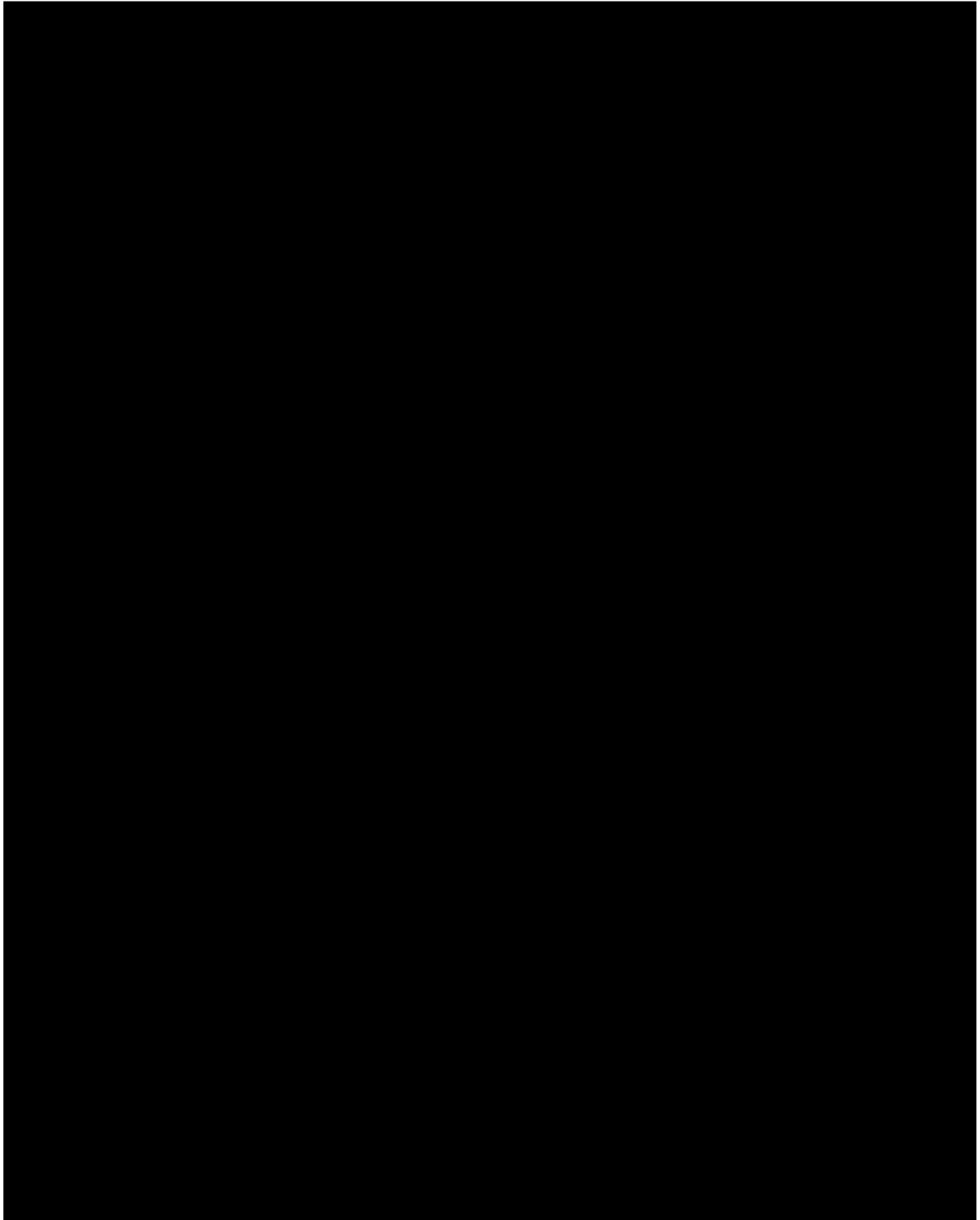
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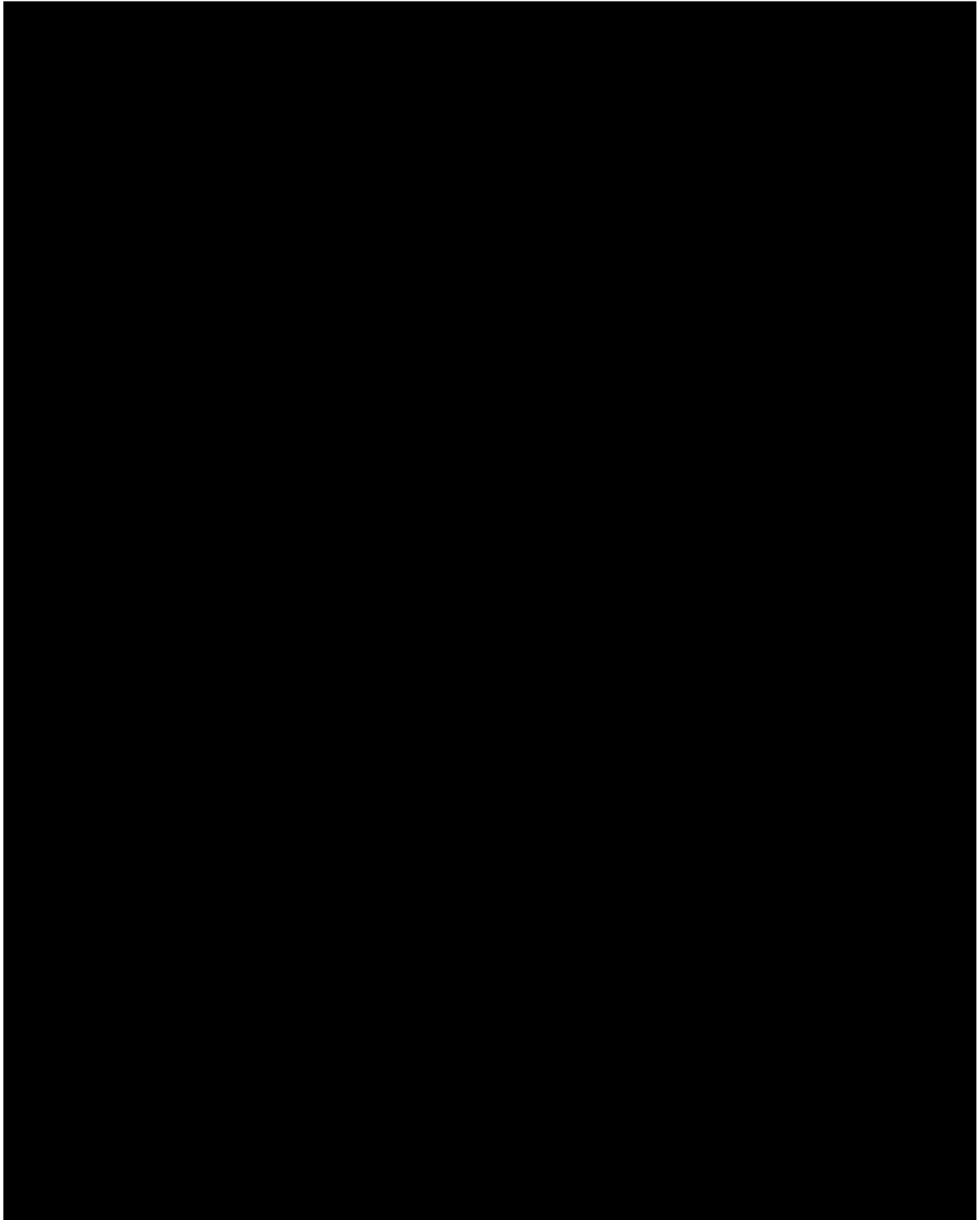


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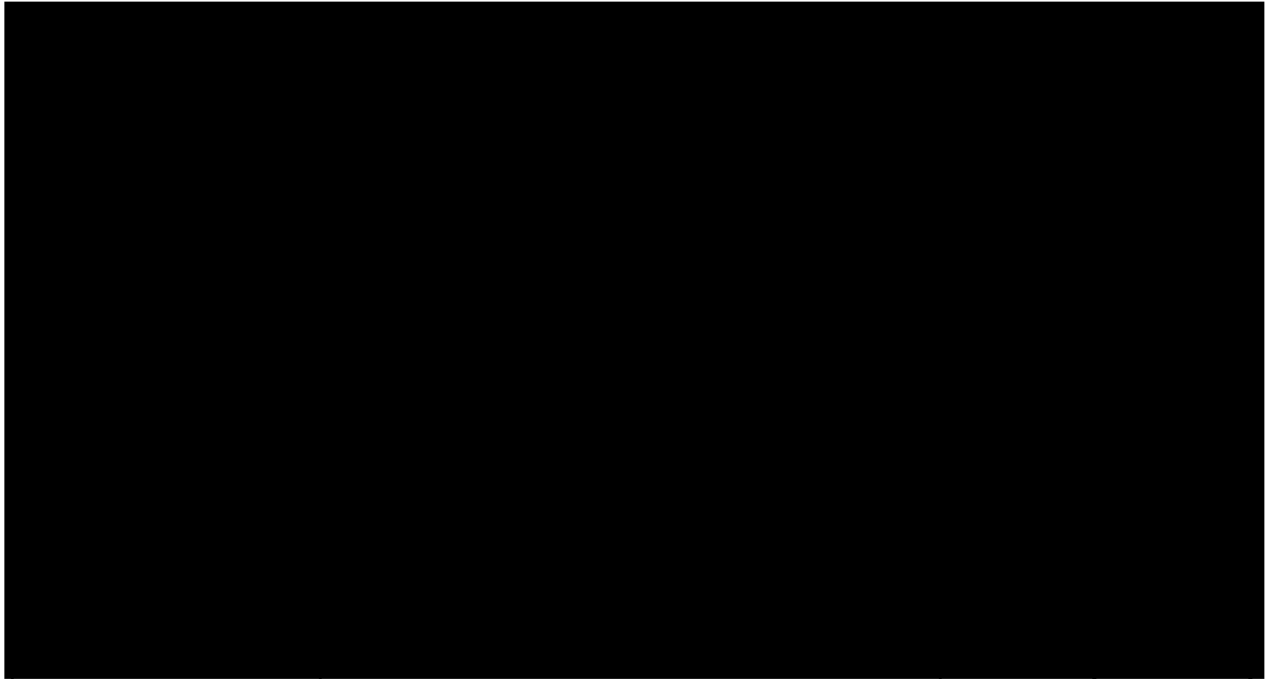


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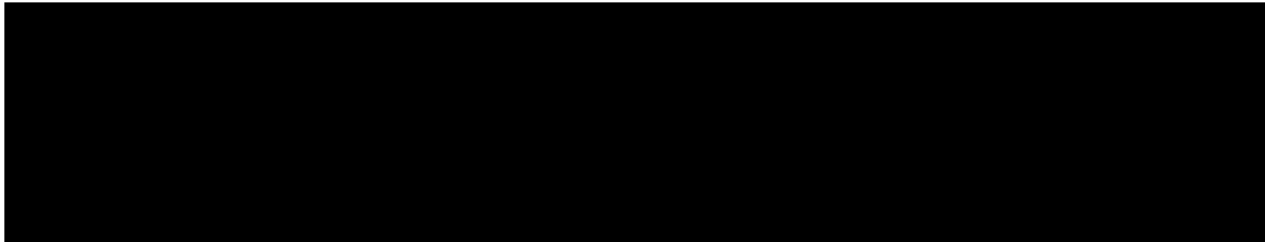
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B. verification of information provided by Authorized Sports Bettors opening a new account:

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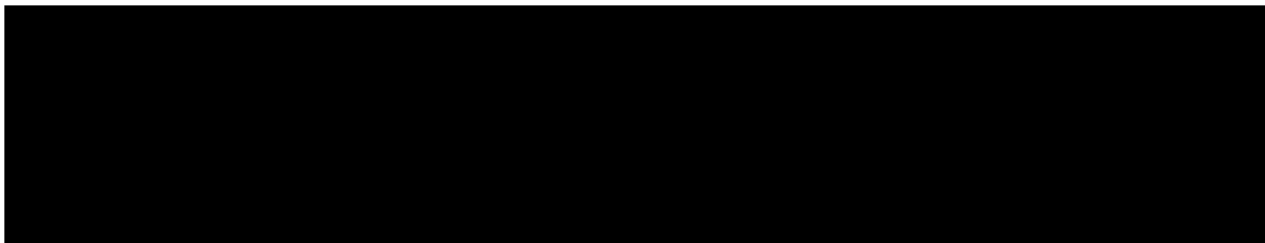


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RSI:

How RSI validates our customers:

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

Kambi:

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

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RSI:

- We have an In-house compliance officer and Anti-Money Laundering processes and training for all employees

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- We have tax reporting for larger winnings, and suspicious money laundering activity reporting tools
- We have limits on deposits based on risk profiling and player transactional history

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- Every session, bet, deposit attempt, withdraw and contact is retained and tracked for each player

D. the systems used to ensure that Authorized Sports Bettors are physically located within the State of New York while placing a wager;

RSI:

We have successfully operated in several US online jurisdictions, integrating vendors to ensure wagers are being placed in the jurisdiction and mobile devices and desktops/laptops out of the jurisdiction are blocked.

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Geo-fencing will ensure only players within the New York borders are allowed to play.

The geolocation check provides:

- A platform comprising information of up to four geolocation services (IP, WIFI, GSM cell tower, GPS)
- Anti-spoofing tools
- Device fingerprinting tools

Processes currently exist to inform the player if during a gaming session they travel outside the permitted area. On Screen messages are displayed and their play is prohibited.

RSI can work within the regulations to determine the appropriate method for engaging customers outside the permitted gaming area while still prohibiting actual betting. These options include limiting player access to website view only, account creation or even funds deposit.

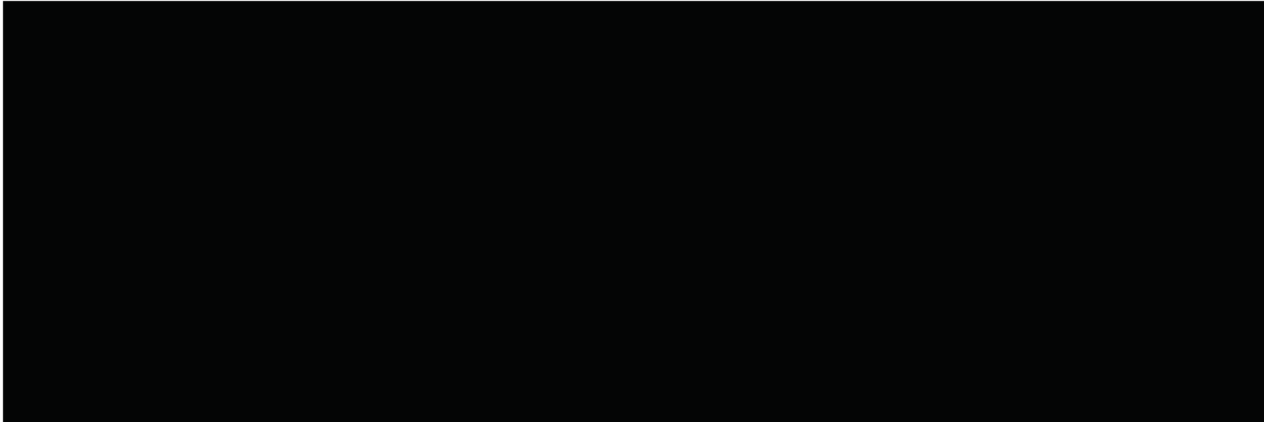
E. the technology to ensure that any wager is accepted through equipment physically located at a licensed gaming facility in the State;

Kambi:

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

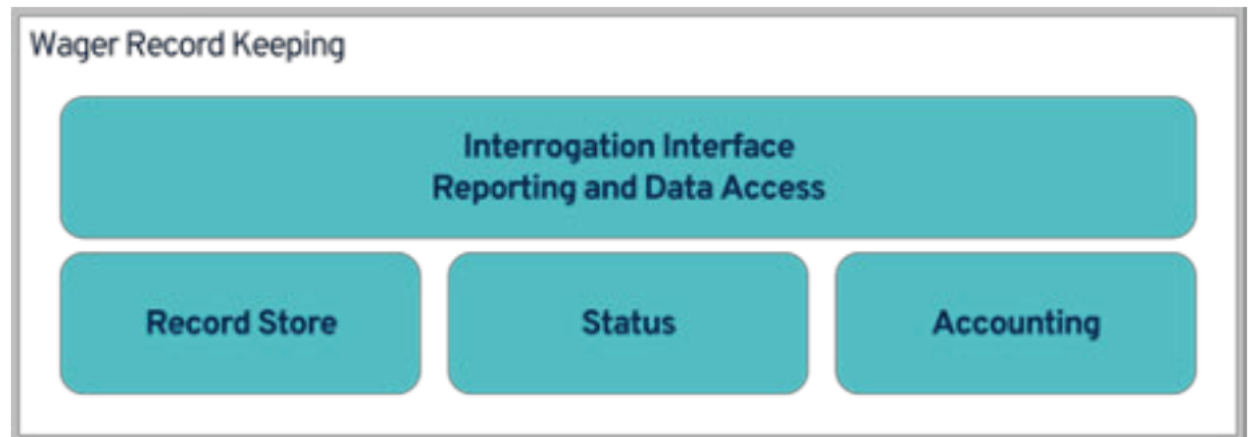
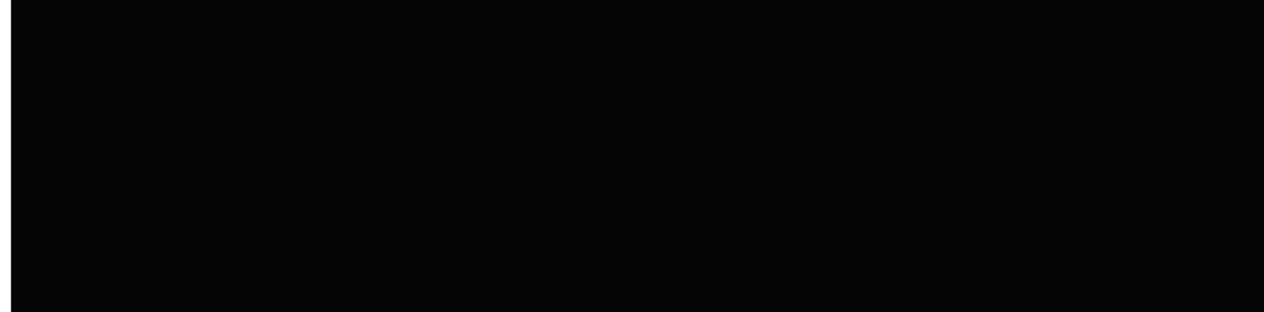
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These applications ensure that any wagering transaction is received [redacted] and accepted ([redacted]) on the servers physically located at the licenced gaming facility. If any of these components is unavailable at the licenced gaming facility, the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

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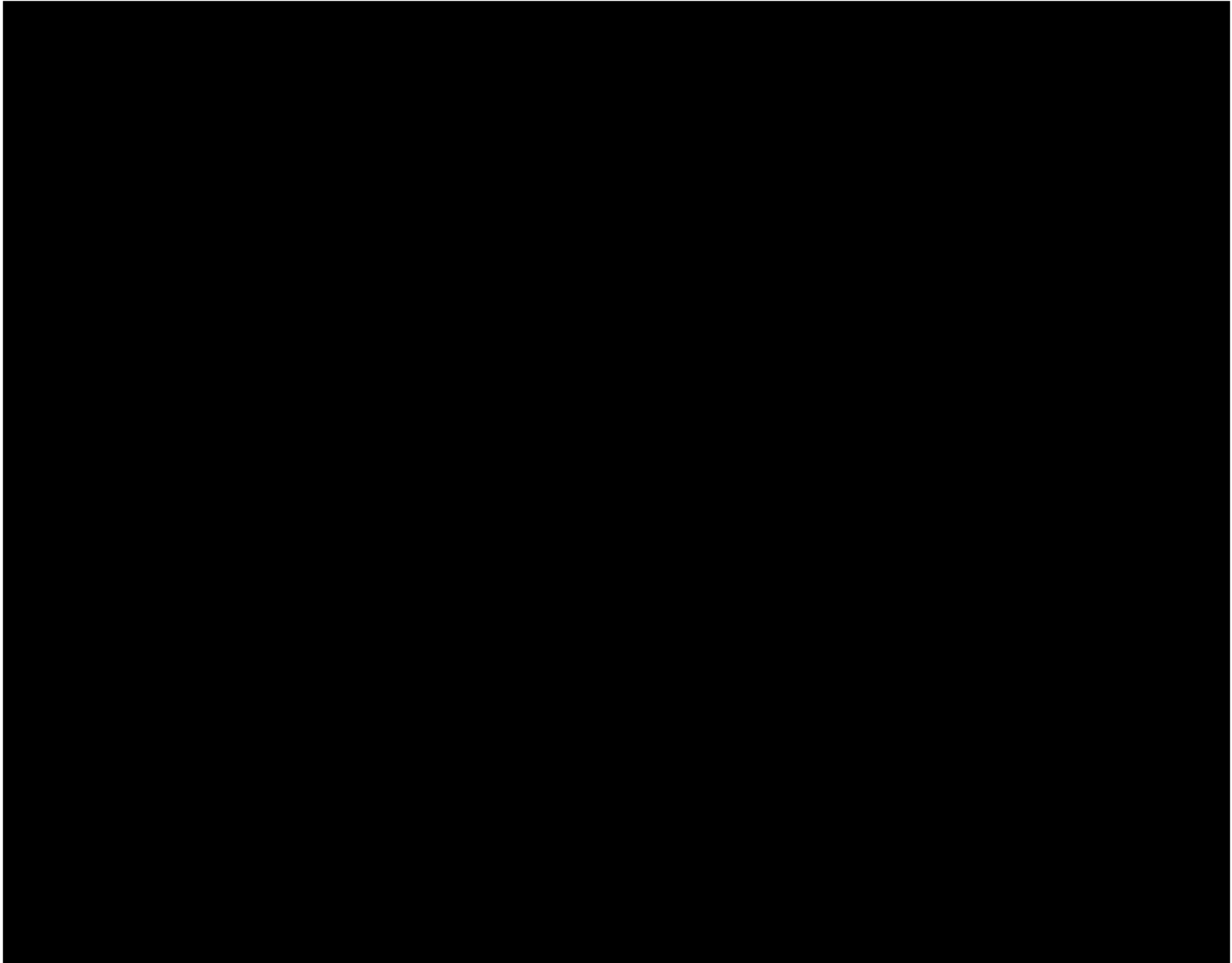
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RSI:

All transactional servers for both the operator and the platform which record and process betting transactions are located within the state. Communication protocols between betting clients and the servers are established in such a way to ensure rerouting of wagers is not possible.

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

Kambi:



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[REDACTED]

[REDACTED]

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Kambi Recovery plan

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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]

SECTION CONTAINING CONFIDENTIAL INFORMATION ENDS HERE

RSI:

Availability of redundant servers will depend upon allowed location(s). If a secondary location - in a different data center to the primary location - is allowed for redundancy in case of a disaster then a replica of RSI hardware will be in place at the redundant data center. This redundant hardware will have an as-live replica of data from the primary location and thus be ready for service after only a short delay (i.e. a couple of hours) whilst DNS is re-routed and any other network changes are arranged.

If it is not possible to have redundant servers outside of the primary location, then redundancy will be in the form of a data backup which can be restored once the primary location is back up and running. This data backup could be on premise in a secondary location/data center or,

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preferably, will be stored in a cloud platform e.g. AWS. This will be a real-time backup of data so that the loss of the primary location will lead to minimal data loss, if any.

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.

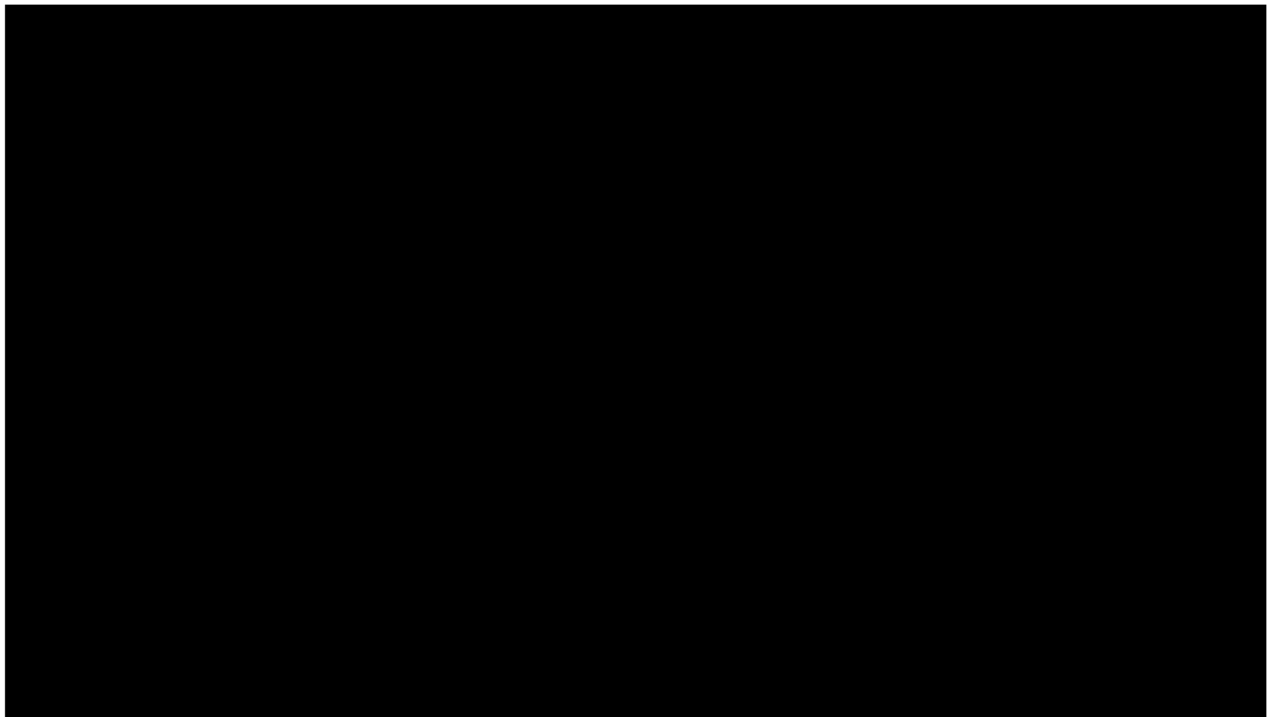
The certifications provide a robust framework, which helps Kambi to manage regulatory and legal requirements.

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 Security design principles

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Logical Security

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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]

[REDACTED]

[REDACTED]

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Physical Security

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Depending on office location and activity in the office the office is either protected [REDACTED]

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Employment and contractor background checks

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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

SECTION CONTAINING CONFIDENTIAL INFORMATION BEGINS HERE

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]

SECTION CONTAINING CONFIDENTIAL INFORMATION ENDS HERE

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:

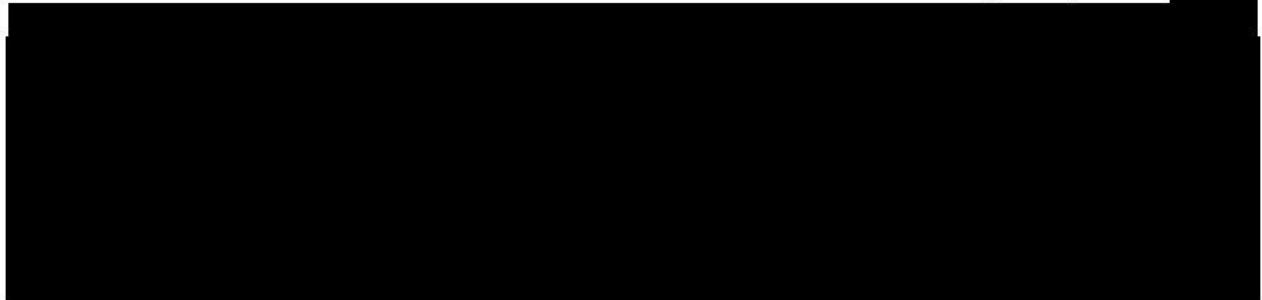
SECTION CONTAINING CONFIDENTIAL INFORMATION BEGINS HERE

[REDACTED]

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The internal audit is risk driven and includes areas not included in the regulatory audit



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Third-party communications

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As per 5330.10(e)



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

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



Security is tested internally

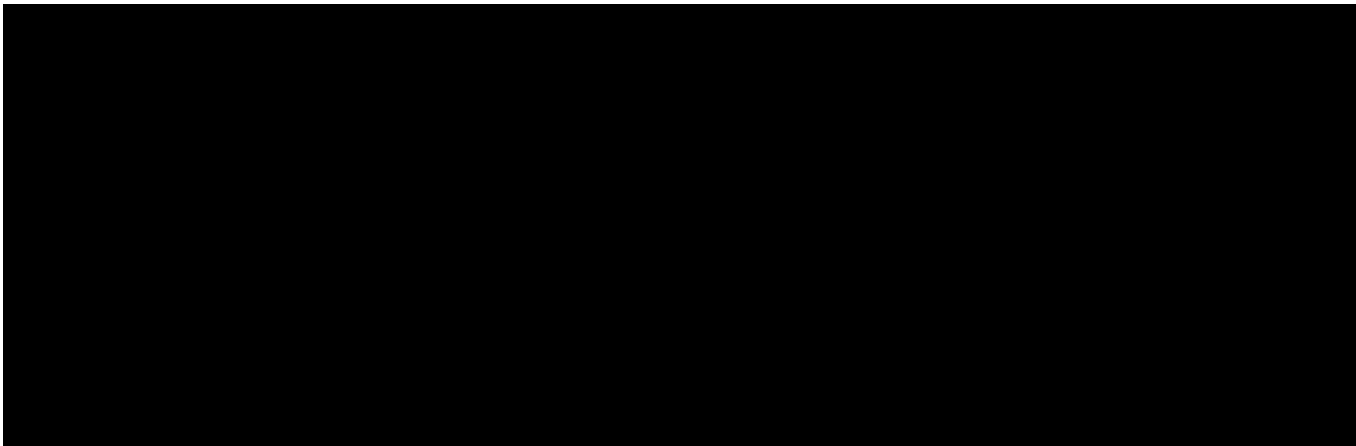


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Remote access to the sports wagering platform

Kambi manages all aspects of the sportsbook service in-house, and is integrated with Rush Street Interactive's player account management platform. Kambi maintains an ISO27001 / WLA/SCS certified ISMS containing a comprehensive set of information security policies and procedures.

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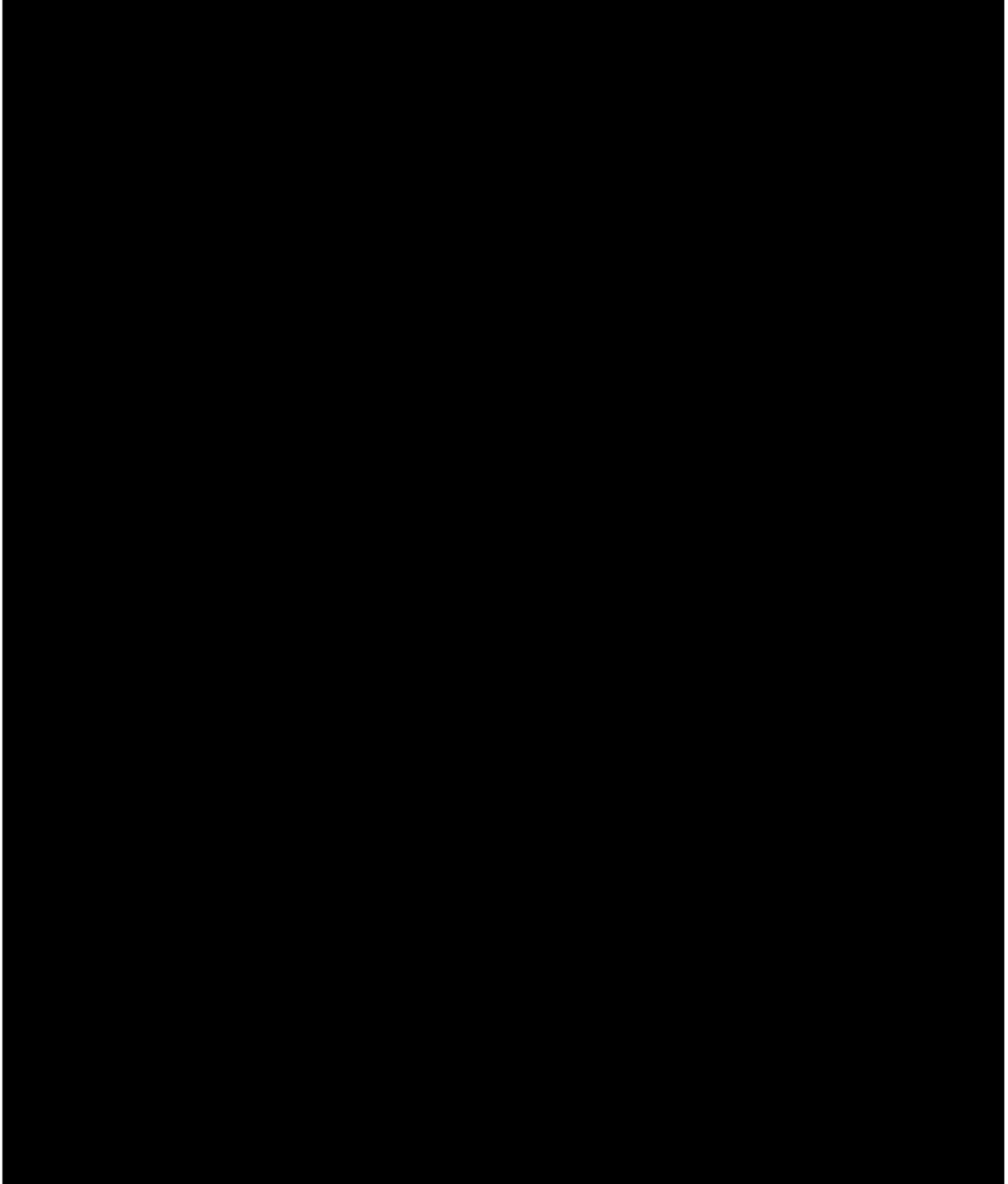


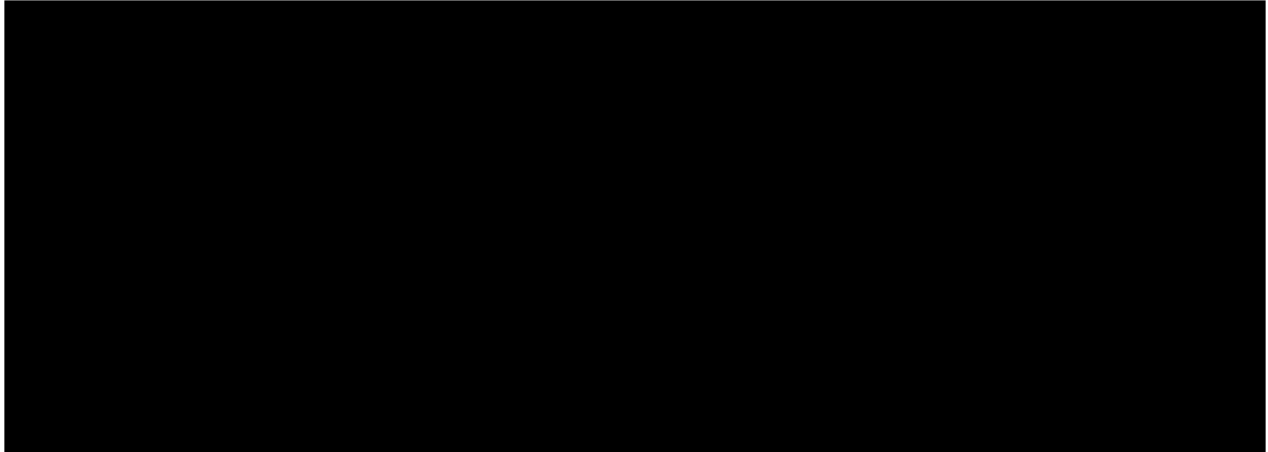
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RSI Security Standards:

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

Kambi:

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.

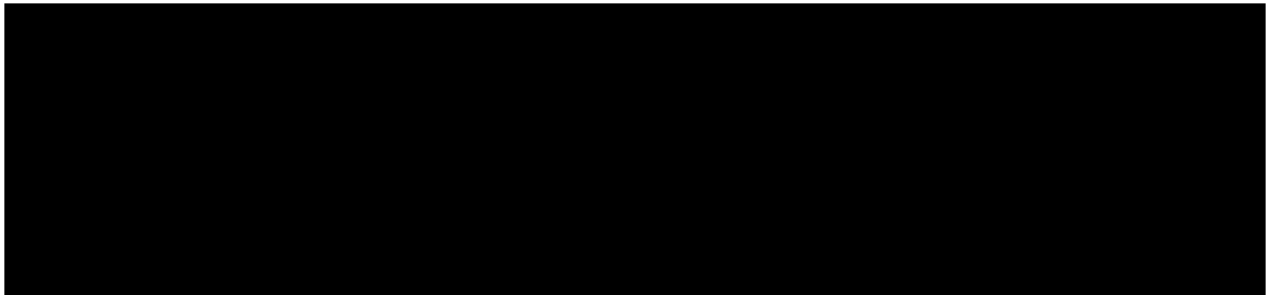
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Kambi's anti-match fixing, and fraud strategy and procedures are enacted by its dedicated Sportsbook Control team. The department comprises a growing number of employees (currently [REDACTED] which processes all internal and external information relating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

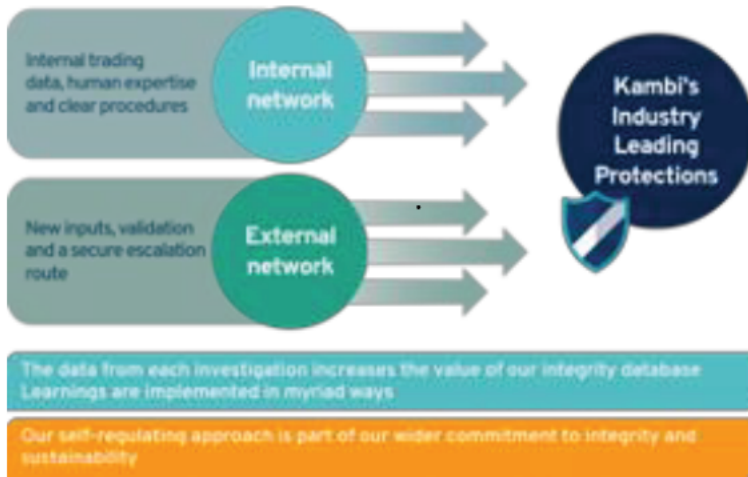
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The primary aim of Kambi's match-fixing strategy is prevention; the goal is to minimize the number of potentially fixed events offered via Kambi's platforms.

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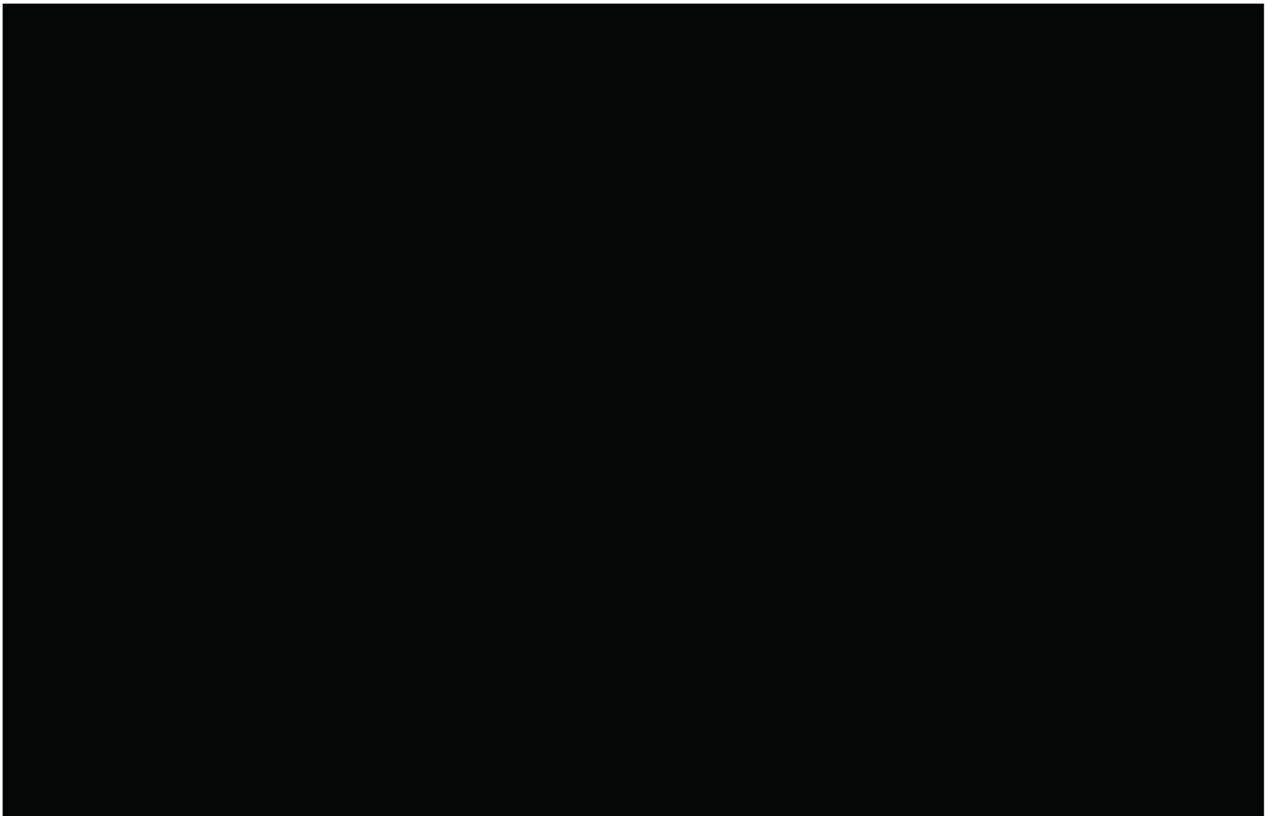


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15
Investigations
conducted per week

50
Events blocked
each day



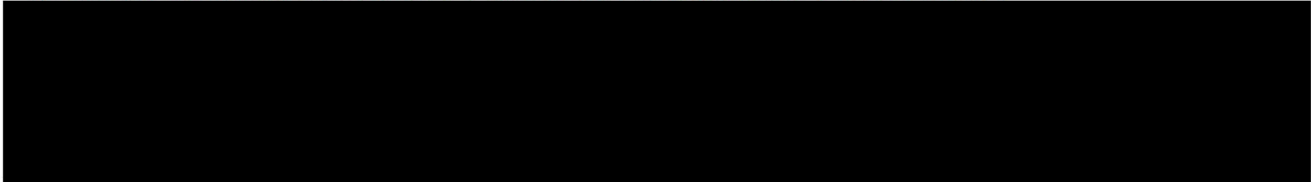
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Technical Compliance

If this consortium is selected, RSI, as the operator using the Kambi platform, 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.

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Sport	Config.	Gov. Body	Moneyline / Win Bet	Point Spread	O/U	H2H	Futures	Team Props	Player Props
American Football									
American Football									
American Football									
American Football									
American Football									
American Football									

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Licensure

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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

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Europe, as well as assisting and advising various regulatory bodies, academic research projects and sports governing body reviews about best practice in the integrity field.

RSI Sports Integrity Monitoring

- We partner with U.S. Integrity to share suspicious and abnormal betting activity.
- To the extent requested by and where lists are provided by sports leagues, we monitor accounts versus lists of athletes and team/league personnel provided by leagues.
- We cooperate with all regulatory investigations including those related to sports integrity
- We provide any information around abnormal or suspicious betting activity with regulators that may indicate an integrity concern.

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I. responsible gaming.

Kambi:

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.

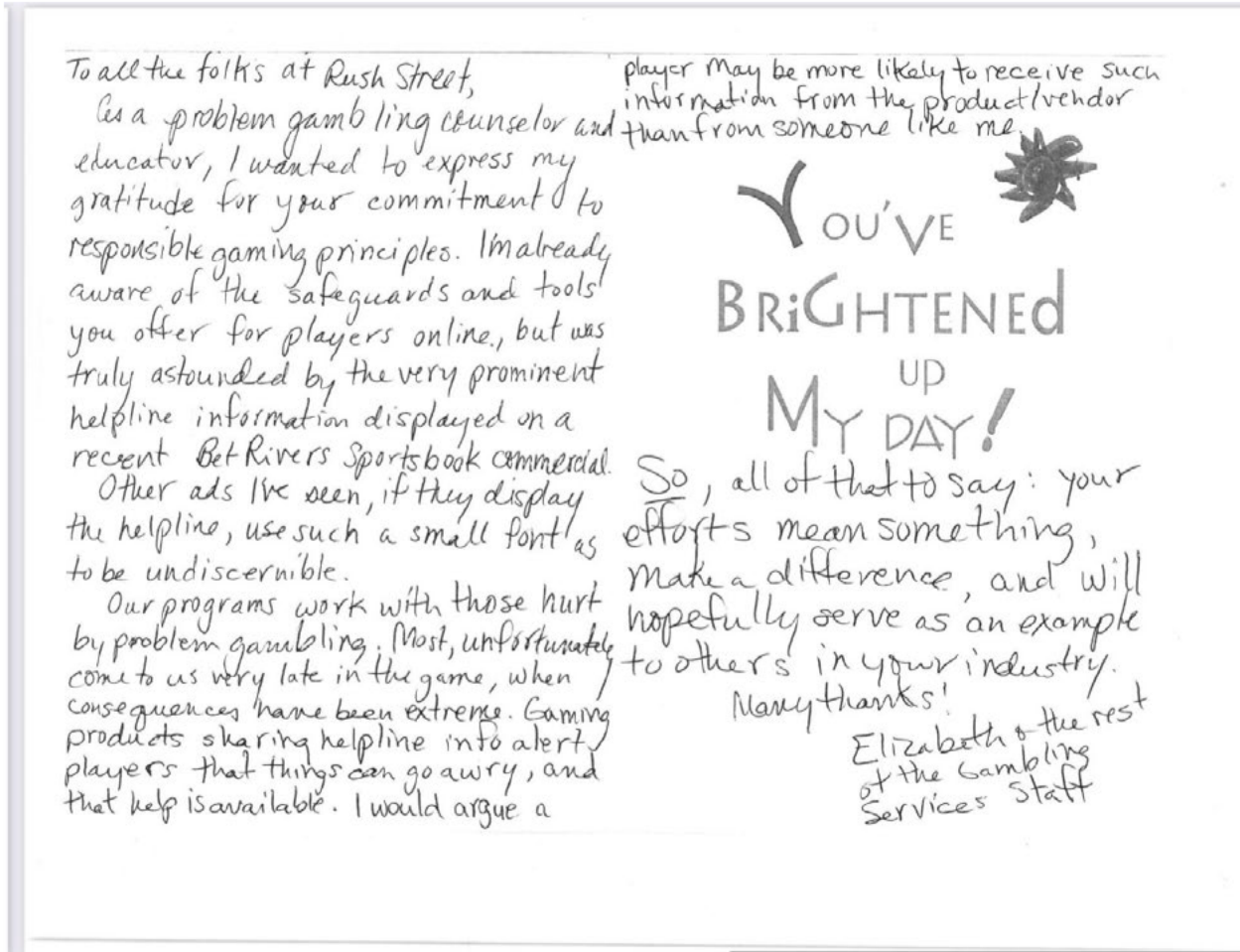
In 2018, regulators' increased focus on responsible gambling led to thorough reviews of several Kambi operator partners' responsible gambling procedures and protocols. Following these reviews, Kambi's responsible gambling measures, as employed by our operators, were not found to be of any concern. As 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.

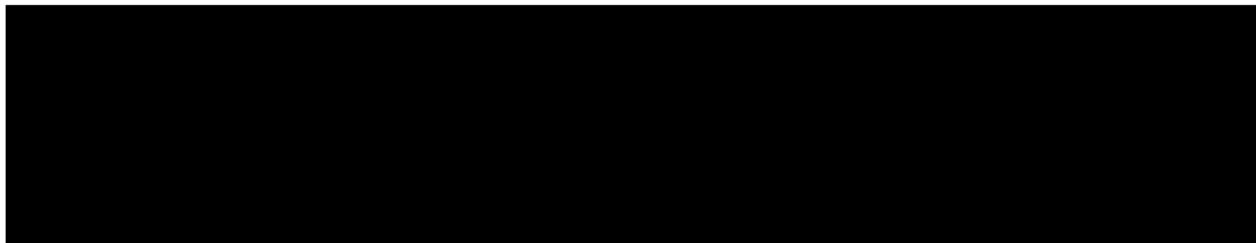
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We are committed to making responsible gaming a priority and take this issue very seriously. The letter below, from a problem gaming counselor, best encapsulates the emphasis we place on responsible gaming.



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In further support of our commitment to making and keeping responsible gaming a priority, we have recently created the position of Director of Corporate Social Responsibility within the Compliance Department. Among the duties of this position are the following:

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- Position RSI as a leading operator in corporate social responsibility including responsible gaming.
- Analyze existing and new markets from a compliance and responsible gaming perspective.
- Coordinate and communicate both internal and external Responsible Gaming program and campaigns.
- Partner with the Marketing department to establish communication guidelines and secure that all player communications made through Customer Support, Marketing, and VIP team abide by these guidelines.
- Ensure compliance and implementation of Responsible Gaming program policies and procedures.
- Maintain and analyze Responsible Gaming annual audits, verifies data findings and/or exceptions, and recommends process enhancements to existing systems.

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While many are able to gamble responsibly, there is a small portion of the population who can develop serious, sometimes uncontrollable gambling problems. This can affect persons of any age, income, gender or race at any time. To protect those that are vulnerable to gambling problems and others affected by their behavior, we have established policies and guidelines which deal with issues such as underage gambling and problem gambling as detailed on this page. We have additionally implemented employee education and training programs, and detailed written procedures, to help our employees identify and assist in managing these issues.

Players may set responsible gaming limits for online gaming, including deposit limits, spend limits, and time limits, and/or self-suspend participation in wagering games offered through the Services for a designated time period with a minimum of 24 hours (a “Cool-Down Period”), and accommodating any desired cool-down setting the user deems appropriate; as detailed and made available via our gaming portal.

Self-Exclusion

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If a player is subject to exclusion, they may continue to use the game account in a limited way, in effect they can access the Help Center, the End-User License Agreement pages, withdraw funds, and interact with Player Support. On the contrary, they cannot bet and/or make a new deposit to the game account.

RSI believes gambling is a form of entertainment that shouldn't negatively impact a player's life. If a player feels that gambling may become a problem, we provide readily available help information online.

Control and intervention system for compulsive gambling

1. Players can set responsible gaming limits and can exclude from gaming activities via the site in the responsible gaming sections.
2. RSI employees are also obligated to set a potential Problem Gambler flag in the player profile in the back office if any player communications indicate a gambling problem, such as
 - a. Any reference to spending over their financial security
 - b. Any reference to personal consequences of their gaming activity
 - c. Any reference to personal hardship
 - d. Any reference to extreme negative personal impact from gaming
3. Problem Gamblers report generated at least once a month for review by Casino Manger
4. Any player who has been identified as a problem gambler will have their account suspended pending contact with the player
 - a. Account will not be reopened until the player either
 - i. Sets responsible gaming limits, or
 - ii. Provides adequate explanation for the red flags indicated through communications with administrators, or
 - iii. Player has agreed to a period of cool down (exclusion) of 7 days

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Reporting functionality is available for the player for each of the responsible gaming settings:

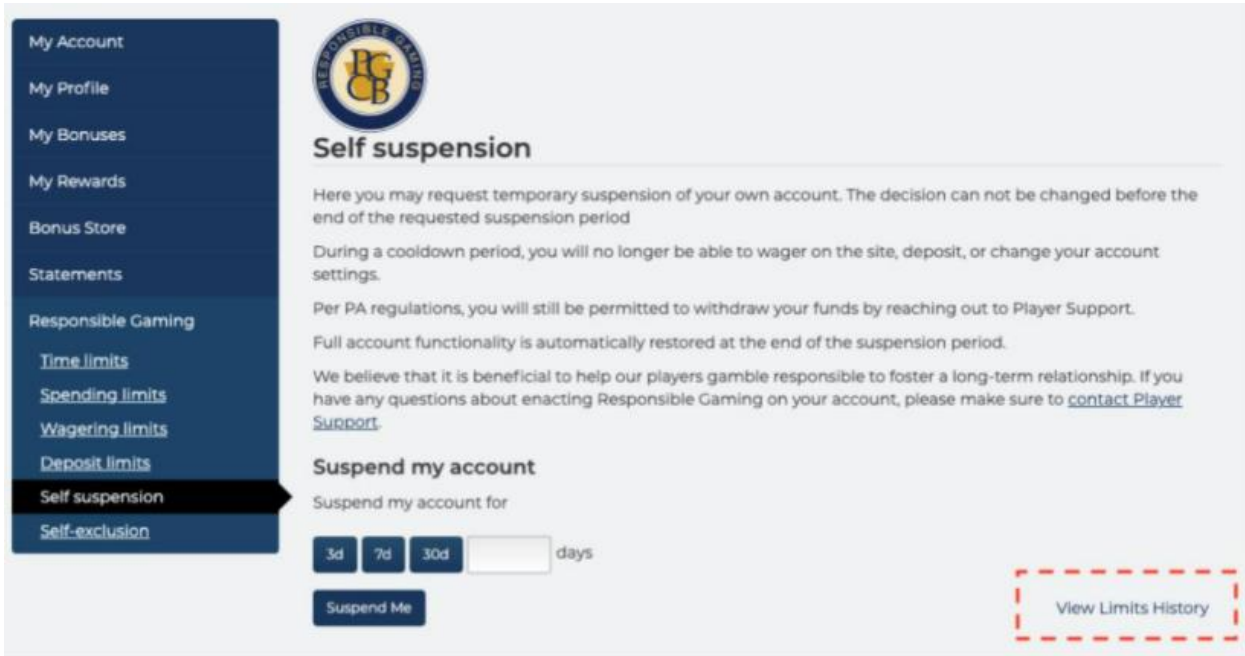
The screenshot shows the 'Time limits' page. On the left is a dark blue navigation menu with the following items: My Account, My Profile, My Bonuses, My Rewards, Bonus Store, Statements, Responsible Gaming, Time limits (highlighted with a white arrow), Spending limits, Wagering limits, Deposit limits, Self suspension, and Self-exclusion. The main content area features the 'RESPONSIBLE GAMING' logo at the top left. Below it is the heading 'Time limits' followed by explanatory text: 'Time Limits allow you to restrict the number of hours in a day you can spend on the site. The login timer starts each time you login and stops when you logout. Once your login time limit is reached, you may finish your ongoing game but will not be permitted to make another real money wager. Setting or decreasing your time limit will take effect immediately. Requests to remove or increase a time limit will remain pending until the next calendar day. After this mandatory wait you can activate a new limit using this screen. We believe that it is beneficial to help our players gamble responsibly. If you have any questions about our Responsible Gaming features, please make sure to [contact Player Support](#) for help.' Below this is the section 'Your current limit' with a bullet point: 'No daily limit'. The 'Set new limit' section contains a horizontal green progress bar with a scale from 1 to 24 hours. A 'Set limit' button is positioned below the bar. A red dashed box highlights a 'View Limits History' link in the bottom right corner. A '24 h' label is visible at the end of the progress bar.

The screenshot shows the 'Spending limits' page. The navigation menu on the left is identical to the previous screenshot, with 'Spending limits' highlighted by a white arrow. The main content area features the 'RESPONSIBLE GAMING' logo. Below it is the heading 'Spending limits' followed by explanatory text: 'You may define your spending limit to minimize your potential losses. If you specify a limit, and that value is reached, you will not be permitted to play with real money until your selected time period expires. Setting or decreasing your spending limit will take effect immediately. Please click on the "i" tooltip for more information regarding daily, weekly, and monthly time definitions. Requests to remove or increase a spending limit will remain pending until the relevant time period has elapsed (e.g. until beginning of the next calendar day/week/month). After this mandatory wait you can activate new limit on this screen. We believe that it is beneficial to help our players gamble responsibly. If you have any questions about our Responsible Gaming features, please make sure to [contact Player Support](#) for help.' Below this is the section 'Your current limits' with three bullet points: 'No daily limit', 'No weekly limit', and 'No monthly limit'. The 'Set new limits' section contains three columns: 'Daily' with an 'i' tooltip icon and a 'Daily limit' input field; 'Weekly' with an 'i' tooltip icon and a 'Weekly limit' input field; and 'Monthly' with an 'i' tooltip icon and a 'Monthly limit' input field. A 'Set limits' button is positioned below the input fields. A red dashed box highlights a 'View Limits History' link in the bottom right corner.

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The screenshot shows the 'Wagering limits' page. On the left is a dark blue navigation menu with the following items: My Account, My Profile, My Bonuses, My Rewards, Bonus Store, Statements, Responsible Gaming (highlighted), Time limits, Spending limits, Wagering limits (highlighted with a white arrow), Deposit limits, Self suspension, and Self-exclusion. The main content area features the 'RESPONSIBLE GAMING' logo and the title 'Wagering limits'. Below the title is explanatory text: 'You may define a limit to the wagers you will be permitted to place within a time period or a limit to a single bet per game type. If you specify a limit, and that value is reached, you will not be permitted to play with real money until your selected time period expires. Setting or decreasing your wagering limit will take effect immediately. Please click on the "i" tooltip for more information regarding daily, weekly, and monthly time definitions. Requests to remove or increase a wagering limit will remain pending until the relevant time period has elapsed (e.g. until beginning of the next calendar day/week/month). After this mandatory wait the new limit will automatically update upon login. We believe that it is beneficial to help our players gamble responsibly. If you have any questions about our Responsible Gaming features, please make sure to [contact Player Support](#) for help.' Below this is the section 'Your current limits' with a bulleted list: 'No daily limit', 'No weekly limit', 'No monthly limit', 'No sportsbook max bet limit', 'No slot games max bet limit', and 'No table games max bet limit'. The 'Set new limits' section contains three rows of input fields: 'Daily' (Daily limit), 'Weekly' (Weekly limit), and 'Monthly' (Monthly limit), each with an information icon. Below these are 'Sportsbook' (Max bet), 'Slot Games' (Max bet), and 'Table Games' (Max bet), each also with an information icon. At the bottom left is a 'Set limits' button, and at the bottom right is a 'View Limits History' button enclosed in a red dashed box.

The screenshot shows the 'Deposit limits' page. The navigation menu on the left is identical to the previous page, but 'Deposit limits' is highlighted with a white arrow. The main content area features the 'RESPONSIBLE GAMING' logo and the title 'Deposit limits'. Below the title is explanatory text: 'Deposit limits allow you to control how much you deposit on the site. Setting or decreasing your deposit limit will take effect immediately. Please click on the "i" tooltip for more information regarding daily, weekly, and monthly time definitions. Requests to remove or increase a deposit limit will remain pending until the relevant time period has elapsed (e.g. until beginning of the next calendar day/week/month). After this mandatory wait the new limit will automatically update upon login. We believe that it is beneficial to help our players gamble responsibly. If you have any questions about our Responsible Gaming features, please make sure to [contact Player Support](#) for help.' Below this is the section 'Your current limits' with a bulleted list: 'No daily limit', 'No weekly limit', and 'No monthly limit'. The 'Set new limits' section contains three rows of input fields: 'Daily' (Daily limit), 'Weekly' (Weekly limit), and 'Monthly' (Monthly limit), each with an information icon. At the bottom left is a 'Set limits' button, and at the bottom right is a 'View Limits History' button enclosed in a red dashed box.



6.4 CAPACITY TO BRING AUTHORIZED SPORTS BETTORS TO PLATFORM

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

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

Kambi:

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. Kambi was the first to market in 10 US states, including New York for retail with Rush Street Interactive, 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 licences 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 Superbowl LV.

Delivery excellence

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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 delivery record in the US includes:

- First operator live in PA (Rush Street Interactive, May 2019)
- First operator live in IN (Rush Street Interactive, October 2019)
- First operators live in IL (Rush Street Interactive, June 2020)
- First operators live in CO (Rush Street Interactive, May 2020)
- First operator live in MI (Rush Street Interactive, July 2020)
- First operator live with retail in NY (Rush Street Interactive, July 2019)
- First operator live with retail in IL (Rush Street Interactive, March 2020)

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 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.

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.

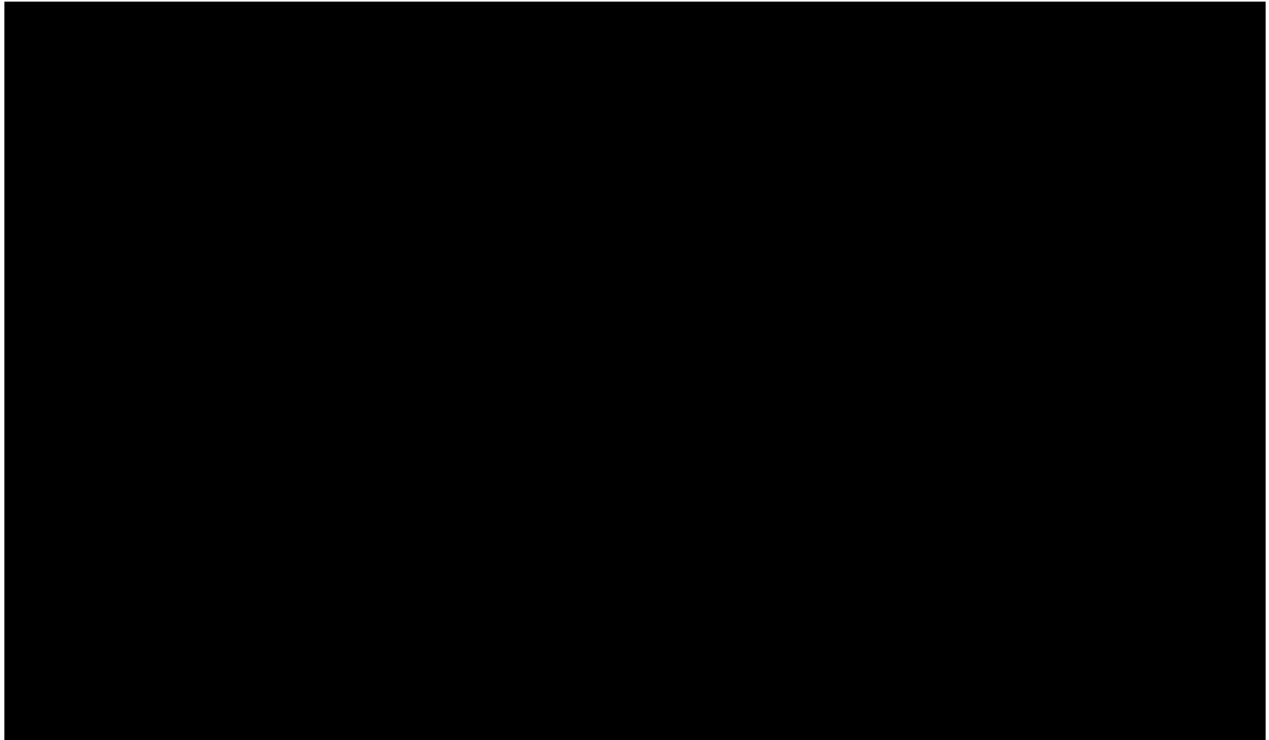
Kambi has an expansive Delivery Team to ensure that all launches are successfully planned and executed, even where there is uncertainty about regulation.

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.

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Please see Exhibit B for a high-level overview, referencing the current RFA process.

6.5 WORKFORCE DIVERSITY

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

A. the organization's policy on workforce diversity;

Kambi:

Background

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

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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

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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.

RSI:

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Rush Street Interactive is an equal opportunity employer and committed to a diverse and inclusive workplace with a top-down approach. All qualified applicants will be considered for employment without regard to race, national origin, ancestry, sex, sexual orientation, sexual identity, and expression, marital status, family status, lifestyle, age, culture, religion, military, and veteran status, citizenship, or disability.

Employment decisions, including those regarding hiring and promotions, are based on factors consistent with the principles of equal employment. Similarly, the administration of all other personnel matters such as compensation, benefits, transfers, reduction in force, leave of absences, recall, and training are done without regard to such circumstances as required by law.

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

Kambi:

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%

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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

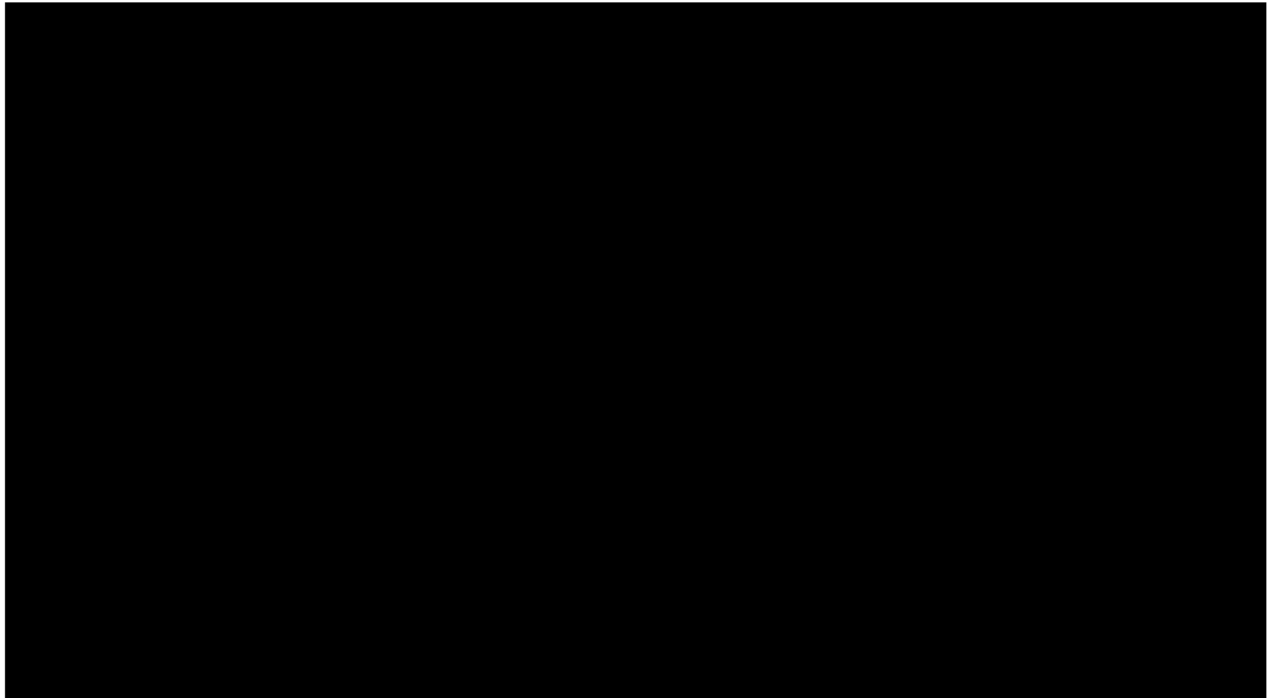
The Inclusion Survey promotes the thinking that diversity goes beyond visible traits which is something we really value. By including structural aspects, we can foster a culture that includes a broad and encompassing definition of diversity. The survey will include Family Status, Disability Status, and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

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

(1) RSI Director of Corporate Social Responsibility

In further support of our commitment to diversity and inclusion, we have recently created the position of Director of Corporate Social Responsibility within the Compliance Department. Among the duties of this position are the following:

- Develop and execute a strategy and analysis across all social responsibility activities.
- Provide strategic guidance and support to senior leadership in the establishment of organizational social responsibility goals, objectives and reporting.
- Position RSI as a leading operator in corporate social responsibility including DEI.
- Build and promote positive relationships within RSI and gather insights and ideas on how to make CSR initiatives impactful.
- Collaborate with business partners across RSI to improve sustainability and ethical sourcing strategy and reporting.
- Maintain essential company metrics and public disclosures prescribed by investor surveys and indices.
- Provide regular reports and analysis in accordance with key performance indicators (KPI) to leadership and company stakeholders as necessary regarding the company's CSR strategic plan.
- Position RSI to capitalize on emerging opportunities, addresses relevant issues, identifies, and assess markets and opportunities relating to social and environmental issues and their potential importance to the company.

- Develop CSR materials for use at the local, state, and country levels.

(2) RSI Recruitment

RSI's recruiting efforts have extended to partnering with over 30 New Jersey & Pennsylvania colleges and universities to attract local & diverse students and alumni for active openings. Active openings are regularly shared and the RSI leadership team recently participated in a diversity focused virtual hiring event which was hosted by Campus Philly who we've partnered with to connect with over 60,000 students in their network at over 60 regional universities including 9 HBCU's. Additionally, RSI is a registered employer with VetsInTech and with RecruitMilitary. Both platforms provide career transition support to active Military, Veterans, and Military Spouses and connect them with registered employers.

6.6 OTHER FACTORS IMPACTING REVENUE TO THE STATE

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

Section 6.6 – Other Factors Impacting Revenue to the State

Our consortium brings together a collection of strong, reputable companies, each with a distinctive brand and strategy for the marketplace. The diversity and reach of our Operator Applicants, in collaboration with their Platform Providers, will serve to drive incremental revenue to the State as we described in Section 6.8.

Importantly, our consortium is also partnered with two of the major tribal gaming operators in the State, the Oneida Indian Nation and Saint Regis Mohawk Tribe. In connection with a successful bid by our consortium, both tribes are prepared to waive certain rights aimed at enhancing the overall revenue opportunity for the State's licensed sports wagering platforms. The quantitative analysis associated with these waivers is also presented in Section 6.8.

The Oneida Indian Nation and Saint Regis Mohawk Tribe's rights and proposed waivers are more fully described in this section.

Oneida Indian Nation:

Waivers to Promote the Integrity and Sustainability of New York's Mobile Gaming Program

In addition to its Revenue Sharing Agreement set forth in section 6.7, the Oneida Indian Nation also will commit to issuing to the State waivers of legal rights and privileges it enjoys, and legal challenges it may otherwise pursue, relating to the State's implementation of PML § 1367 for mobile sports betting (the "Oneida Waivers"). The Oneida Waivers would be executed upon issuance of operator licenses to Caesars and Wynn. The absence of these Oneida Waivers

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would jeopardize the integrity and sustainability of the State’s carefully sculpted tax and competitive structure for generating State revenues under its mobile sports betting program.

Background: Oneida Rights and Privileges

Oneida and the State are party to two significant government-to-government agreements that affect the State’s plan to authorize statewide mobile sports betting, and to charge significant taxes upon its licensed operators of that activity.

(a) 2013 Settlement Agreement

The Oneida Indian Nation, the State, Madison County and Oneida County entered a landmark Settlement Agreement in 2013. This historic agreement is regarded as a model for resolving disputes between States and tribes because it resolved generations of the most controversial disputes between them, ranging from reservation rights, land governance, property taxes, sales taxes, law enforcement, cultural preservation – and gaming issues. The Settlement Agreement was approved by the NYS Attorney General, and enacted into New York Law by the State legislature (see N.Y. Exec. Law § 11). The Settlement Agreement was approved by the federal court, which retained jurisdiction to enforce the agreement and any violations.

To date, both Oneida and the State have abided by all of their duties to each other under the Settlement Agreement. More than that, the Settlement Agreement formed the basis for unprecedented collaboration among Oneida, the State and local municipalities in addressing thorny issues of mutual interest, most recently including Oneida’s hosting numerous coronavirus vaccination clinics for thousands of central New Yorkers through a joint program with the NYS Department of Health, Oneida County Department of Health and Madison County Department of Health.

Under the Agreement, the Oneida Indian Nation now pays the State, Oneida County, Madison County and eight other counties more than \$75 million per year. Oneida has paid the State more than \$465 million so far. Under the Settlement Agreement, those Oneida payments have been allocated among Upstate New York counties: so far, Oneida County has received more than \$130 million and Madison County has received more than \$35 million. These payments also have been distributed among eight other counties, including Onondaga County to fund its debt service for the bonds that financed the Lakeview Amphitheater.

In exchange for these payments, the State assured Oneida (among other things) “total exclusivity” with respect to Class 3 gaming, which includes mobile sports betting, in the ten-county region of Central New York. The Settlement Agreement couldn’t be clearer: “The State shall not legalize, authorize or consent to” Class 3 gaming in violation of Oneida’s ten-county exclusivity zone. This necessarily includes a requirement that the State shall not change the law to authorize Class 3 gaming within the Oneida exclusivity zone. While the Settlement Agreement includes some limited exceptions to the Oneida exclusivity zone (e.g., lottery, charitable events, then-existing games at Vernon Downs), the State neither requested nor negotiated an exception to Oneida’s “total exclusivity” relating to mobile sports betting.

Oneida expects the State to abide by the commitments it made to Oneida in the Settlement Agreement. Among them, the Settlement Agreement imposes upon the State an affirmative duty to prohibit non-Oneida gaming within the Oneida exclusivity zone. The State and Oneida agreed that the Oneida exclusivity protection is a material term of the Settlement Agreement. The State’s

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breach of Oneida exclusivity would constitute a “Material Breach” of the agreement, which “shall be resolved exclusively by the United States District Court for the Northern District of New York.” Oneida, therefore, was troubled to read in the State’s *Common Response to First Questions, July 22, 2021*, that the State believes it may adopt a law which authorizes customers to place mobile sports wagers within the Oneida exclusivity zone to non-Oneida servers. The State claimed that “there is no need for a Nation or Tribe to waive exclusivity” – directed toward Oneida, the only tribe in New York that enjoys exclusivity over all Class 3 gaming -- based upon the State’s unilateral, statutorily-created “deeming” provision. The State’s unilateral action would undermine Oneida’s exclusivity in the Settlement Agreement. To the extent that the New York’s mobile betting program conflicts with the Oneida Settlement Agreement, Oneida’s rights under the Settlement Agreement supersedes the mobile sports betting program. See N.Y. Indian Law § 16 (“notwithstanding any other provision of law, the provisions of the Oneida Settlement Agreement . . . shall be deemed to supersede any inconsistent laws and regulations” (emphasis added)).

The Oneida Settlement Agreement resolved a federal lawsuit related to generations of disputes that arose under federal law. The Settlement Agreed is governed by federal law. It was approved by the United States District Court for the Northern District of New York, which ordered that it “retains jurisdiction to enforce the Settlement Agreement.” *State of New York v. Jewell*, No. 08-CV-0644, 2014 WL 841764 (N.D.N.Y. Mar. 4, 2014). Federal courts have ruled that mobile gaming wagers occur *both* at the location where the customer places the wager *and* location of the server (*California v. Iipay Nation of Santa Ysabel*, 898 F.3d 960, 966-67 (9th Cir. 2018)). The State’s plan to legalize mobile sports wagers to be placed from within Oneida’s ten-county exclusivity zone to non-Oneida servers threatens to Materially Breach the Settlement Agreement. It jeopardizes more than \$75 million in annual payments that Oneida now makes to the State and the local municipalities that depends upon them.

The State can fulfill its obligations to Oneida by mandating platforms and operators to geo-fence Oneida’s ten-county exclusivity zone to preclude placement of wagers from within the Oneida exclusivity zone to non-Oneida servers. While compliant with the Settlement Agreement, this outcome would deny the 1.2 million people who live in the ten-county exclusivity zone (6% of New York’s population) the opportunity enjoyed by all other New Yorkers to participate in mobile sports wagering. And, of course, the carve-out of 1.2 million Central New Yorkers from mobile sports betting would cost the State approximately \$40.5 to \$52.5 million per year in annual tax revenues, assuming a minimum tax rate of 50%.

Central New York has enjoyed eight years of peace and harmony among Oneida, the State and local municipalities under the Settlement Agreement. Oneida settlement payments revenues have prevented county property tax increases. They have helped local municipalities balance their budgets, and they support social services, public safety, schools and public works. Neither Oneida nor the State, regional, county and local public officials and community leaders want to return to the era of disputes arising from the State’s violation of its promises and agreements.

(b) 1993 Gaming Compact

In 1993, Oneida and the State entered into a Gaming Compact which authorizes Oneida to conduct casino games anywhere within the Oneida’s 300,000-acre reservation. The Gaming Compact delineates a list of original games that were approved to be played at the Nation, and the Compact provides a specific procedure authorizing Oneida to add more games in the future.

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Section 15(b) of the Gaming Compact -- the so-called "Most Favored Nation" clause -- authorizes Oneida to adopt any new State gaming specifications for Class 3 games without any further approval by the State. Over the twenty-five years since the inception of the Gaming Compact, Oneida has adopted several of the State's gaming specifications pursuant to section 15(b)'s "Most Favored Nation" clause.

The Oneida Gaming Compact does not require Oneida to share any gaming revenues with the State. Nor does the Gaming Compact have an expiration date, meaning the State has no opportunity to renegotiate these provisions upon the expiration of a term. Upon the State's legalization of mobile gaming and issuance of its governing regulations, Oneida is entitled to adopt the State's mobile gaming specifications into its Gaming Compact to offer statewide mobile gaming throughout New York, with no expiration date. No State approval will be required, and the Gaming Compact does not require any Oneida revenue sharing. Oneida would rely upon the State's position that wagers are deemed to occur at the server to accept wagers placed from customers throughout the State, outside of the Oneida reservation.

By virtue of the State's insistence that wagers placed within New York are deemed to be placed at the location of the server, the State would be estopped from challenging Oneida's ability to accept statewide wagers at its on-reservation server. If the State challenges Oneida's ability to accept statewide wagers at its on-reservation server, the State would undermine the constitutionality of its mobile sports betting program.

Oneida's operation of statewide mobile sports betting under its Gaming Compact without revenue sharing would provide Oneida with a massive advantage in competing against New York's licensed operators, who will be paying to the State at a presumptive 50% (or greater) tax rate.

Oneida Waivers to Protect the Integrity and Sustainability of the State's Tax and Competitive Structure for its Mobile Sports Betting Program

The State needs to deal with Oneida's rights and privileges to protect the integrity and sustainability of the State's carefully sculpted tax and competitive structure for generating State revenues under its mobile sports betting program. Oneida is prepared to do its part to help. Upon issuance of mobile sports betting operator licenses to Caesars and Wynn, Oneida would provide the State with the following Oneida Waivers that would avoid risks to the integrity and sustainability of the State's mobile sports betting program:

1. Oneida Waiver of its gaming exclusivity with respect to mobile sports betting for the term of the license.

Upon issuance of mobile sports betting operator licenses to Caesars and Wynn, Oneida would issue to the State a waiver of the Settlement Agreement's exclusivity provision with respect to mobile sports wagers placed within the Oneida exclusivity zone to non-Oneida servers located in the State. The waiver would remain in effect for so long as Caesars and Wynn retain their mobile sports betting operator licenses and remain party to the Oneida Revenue Sharing Agreement.

2. Oneida Waiver of its right to adopt the State's mobile sports betting gaming specifications into the Oneida Gaming Compact.

Upon issuance of mobile sports betting operator licenses to Caesars and Wynn, Oneida reservation, Oneida would waive its right to operate tax-free statewide mobile sports betting pursuant to the Oneida Gaming Compact from servers located on the Oneida reservation. The

waiver would remain in effect for so long as Caesars and Wynn retain their mobile sports betting operator licenses and remain party to the Oneida Revenue Sharing Agreement.

Additional Oneida Commitments to Enhance Revenue to the State

In addition to its Revenue Sharing Agreement set forth in section 6.7, the Oneida Indian Nation also will commit to reinvesting 100% of its revenues from its Revenue Sharing Agreement with Caesars and Wynn to funding programs and services, including public safety, health care, affordable housing, education and employment for Oneida's members and its non-Oneida employees in Central New York.

Saint Regis Mohawk Tribe:

The Akwesasne Mohawk Casino Resort represents an investment by the Saint Regis Mohawk Tribe in excess of \$230 million in construction and FF&E. And pre-pandemic, the Casino employed over 770 full and part time employees, with annual payroll exceeding \$31 million and annual supplier/vendor contracts exceeding \$37 million.

While the Oneida Indian Nation's geographic exclusivity rights broadly covers all Casino Gaming and Gaming Devices (as defined in its Compact), the Saint Regis Mohawk Tribe's geographic exclusivity under its Compact is limited to Slot Machines. Therefore, Oneida's posture and rights are different from Mohawk's. Nevertheless, the Mohawk Revenue Sharing Agreement includes a waiver during the term of that Agreement of the Tribe's right, privilege, and opportunity to own or operate a mobile sports wagering business that directly competes with the Operator parties to that Agreement.

6.7 REVENUE-SHARING AGREEMENTS

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

Please reference Exhibit D

6.8 PRICING MATRIX AND ACCOMPANYING ANALYSIS

Applicants shall complete and submit a pricing matrix, the form of which is set forth in Appendix

B: Pricing Matrix. This matrix requires the Applicant to set forth the tax rate that an Applicant accepts under varying competitive scenarios of total Platform Providers and Operators. An Applicant must provide a tax rate that is fifty (50) percent or greater for its Preferred Scenario.

However, if the Applicant's Preferred Scenario alone is less than the statutory minimum of two Platform Providers and four Operators, the Applicant must instead provide a tax rate that is fifty (50) percent or greater for such statutory minimum scenario. If an

Applicant does not wish to participate in mobile sports wagering with particular levels of Platform Providers and Operators, the Applicant should enter a tax rate of 0 (zero). If a cell is left blank or unintelligible, such cell will be deemed to be a tax rate of 0 (zero).

In addition to the matrix, an Applicant shall submit an analysis using the Applicant's Preferred Scenario of Platform Providers and Operators. Such analysis shall contain the following:

A. estimate of the total Mobile Sports Wagering Gross Gaming Revenue to be generated annually from all Platform Providers and Operators;

Please see accompanying Tax Binder

B. the Applicant's estimated share of the Mobile Sports Wagering Gross Gaming Revenue to be generated annually from all Platform Providers and Operators;

Please see accompanying Tax Binder

C. the Applicant's basis and methodology for estimates; and

Please see accompanying Tax Binder

D. any other information that the Applicant believes relevant for the Committee to consider in maximizing sustainable, long-term revenue for the State.

Please see accompanying Tax Binder

The Applicant also shall submit a similar analysis for each of the competitive scenarios for which the Applicant has responded on the Matrix. Given the slight variations between scenarios, an Applicant is permitted to band or group various scenarios together for purposes of such analysis.

6.9 INTERNAL CONTROLS

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

Please see Exhibit C for RSI internal controls.

6.1 Experience

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

6.1.A 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 channelled 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. Six of these market firsts involved RSI, including five where RSI launched online sports betting on the first day in a state with the other being in New York State with Rush Street Interactive launching first in the state at Rivers Casino & Resort Schenectady. As a result, Kambi has become the leading Sports Wagering Platform provider in the US, processing many millions of wagers and generating many 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 Rush Street Interactive, our partner in New York.

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As the global and US leader in Sports Wagering Platform provision, Kambi is excited about the potential to play a key role in the online sports wagering market in New York State, bringing safe and secure enjoyment to New York residents and helping generate tax revenue 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.

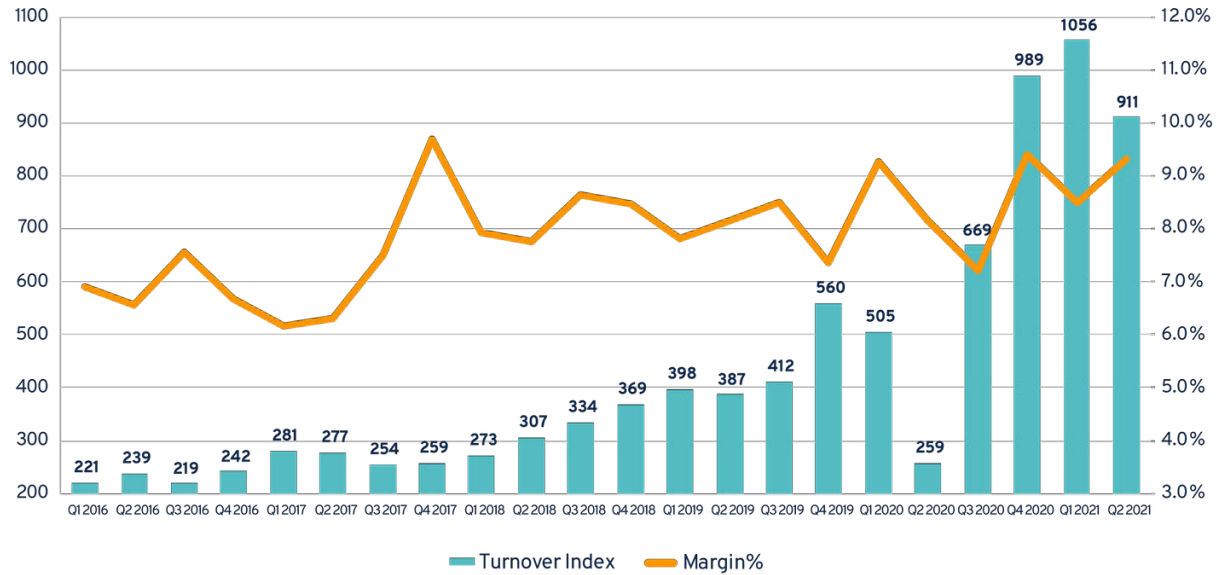
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As illustrated below, the operator trading margin (hold rate) has typically been in the range of 7-9% in recent years

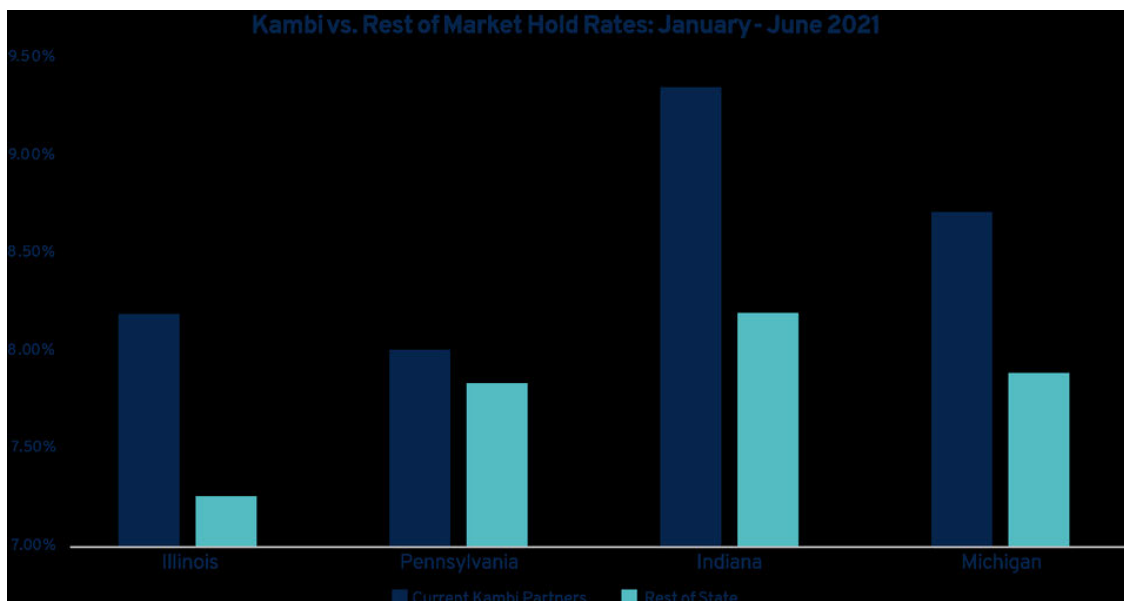


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Kambi operators' turnover and trading margin



An optimal hold rate doesn't necessarily mean a low hold rate. As you can see in the below graph, Kambi has held at a higher rate than the competition in several states through the duration of H1 2021. This shows that even as Kambi is bringing in handle at a record pace, it still maintains its profitability at a constant level, all while ensuring market leading prices for its end users. This all points back to Kambi's risk and trading expertise, and really quantifies the mixture of art and science that goes into harmonizing both long-term player satisfaction and financial success.



6.1.A The number of accounts maintained through the Platforms

As of June 30, 2021, Kambi maintains over 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.

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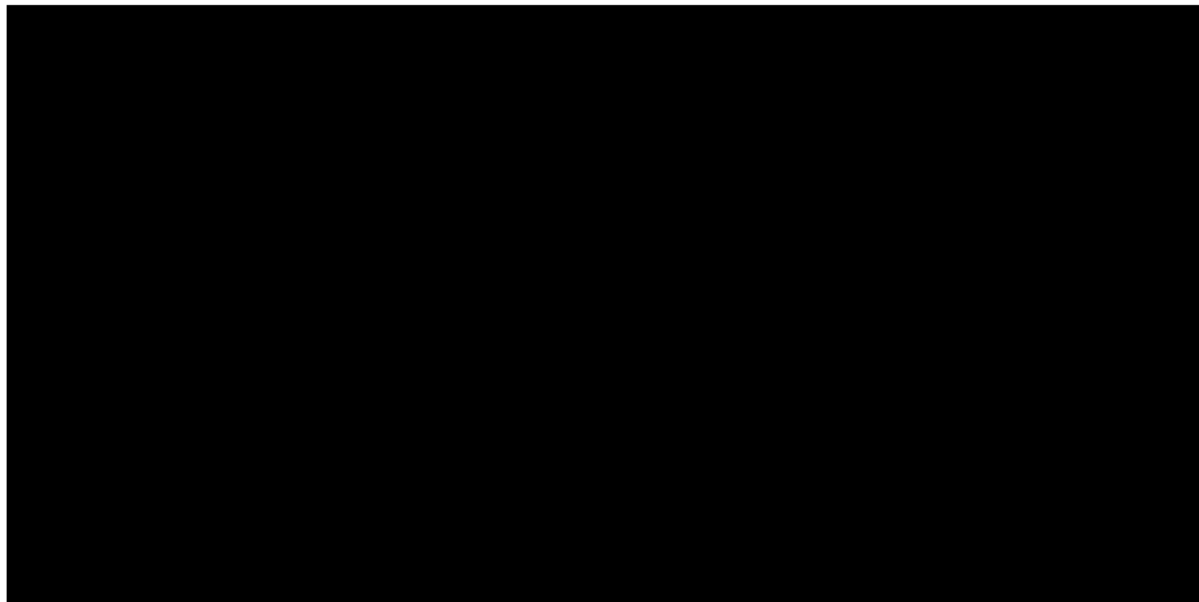
Accounts Maintained July 1, 2020 – June 30, 2021	Online Accounts Maintained
US	
Rest of World	
Total	

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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.

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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.

6.1.A Wagering volume processed annually through the Platforms

In the previous 12 months (ending June 30th, 2021), Kambi processed [REDACTED] bets 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. 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 is able to handle high peak volumes can be found at 6.2.A 'Minimizing downtime/increasing uptime'.

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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]

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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.

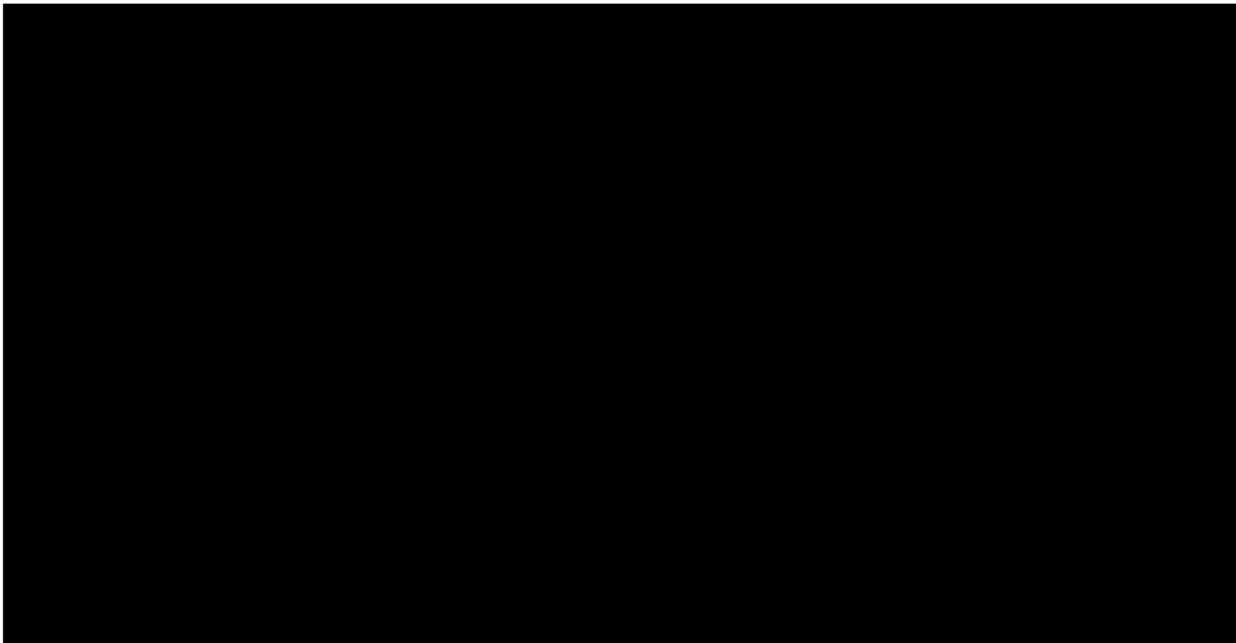
The below graph displays the previous 12 months wagering volume, re-assessed at the end of each quarter. Ex: Q4 2020 represents the wagering volume from January 1, 2020 – December 31st, 2020 (the last day of Q4).

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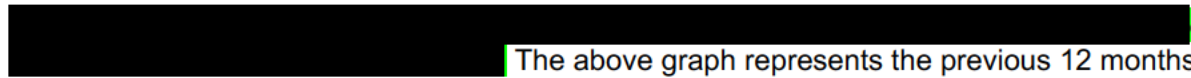
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Handle by Region July 1, 2020 – June 30, 2021	Online Handle (USD)	Retail and Online Handle (USD)
US		
Rest of World		
Total		



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 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 financial success.

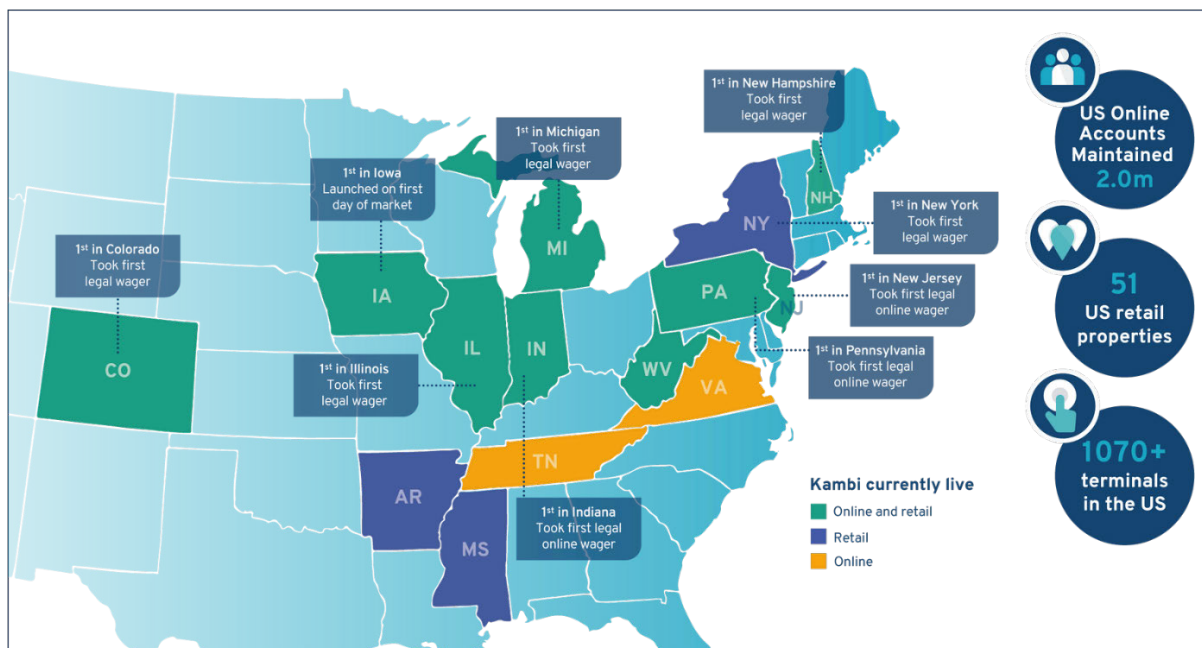
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6.1.A The jurisdictions where the Applicant operates the Platforms

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 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 with Rush Street Interactive in 6 of those markets including the states of New York, Pennsylvania, Illinois, Indiana, Colorado, and Michigan. 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

6.1.A 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. 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 in the US (with 6 market-first launches with RSI)

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 launch of Rush Street Interactive at the first moment possible and within seconds of the market going live and, in the process, took the first regulated online sports wager in the state with Rush Street Interactive. 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 across each, 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.

Notable Rollouts

Sportsbook Name Parent Company Websites	US States Launched with Kambi <i>*denotes first to market</i>	Description
BetRivers Sportsbook Rush Street Interactive	NJ, PA*, CO*, IA, IL*, IN*, MI*, VA	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

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<p>Betrivers.com Playsugarhouse.com</p>		<p>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 BetRivers and SugarHouse 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 sizable online market share in New York State, through an established customer pipeline.</p> <p>Rush Street was the first to launch online in PA with the resulting success and market share detailed above. Rush Street was also first to launch online in IL, 45 days ahead of everyone else, after also being the first to launch a retail sportsbook in IL. Rush Street's CY2020 gross gaming revenue share in IL:</p> <p style="padding-left: 40px;">Retail Sportsbook - 51.2% (#1) Online Sportsbook - 34.8% (#1)</p> <p>In the state of New York, the Rivers casino only represented 26% of the retail commercial casino market share (FY 2019/2020) but generated approximately 45% of the retail in-casino sportsbook market share. This substantial outperformance of the land-based casino market shares, indicates an overperformance in retail sportsbook.</p>
<p>Unibet Sportsbook Kindred 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>

6.1.A Additional information the Applicant believes relevant to demonstrate the Applicant's experience

Factor: 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 benefits these bring 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 the State of New York.

1) Trading and risk management

As the Kambi network continues to grow, so too does the value it offers its operators such as Rush Street Interactive. 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.

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 where 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 would provide additional protections to the entire market, with our global database giving us the ability to raise alerts at an early stage being advantageous to all.

3) Product offering and development

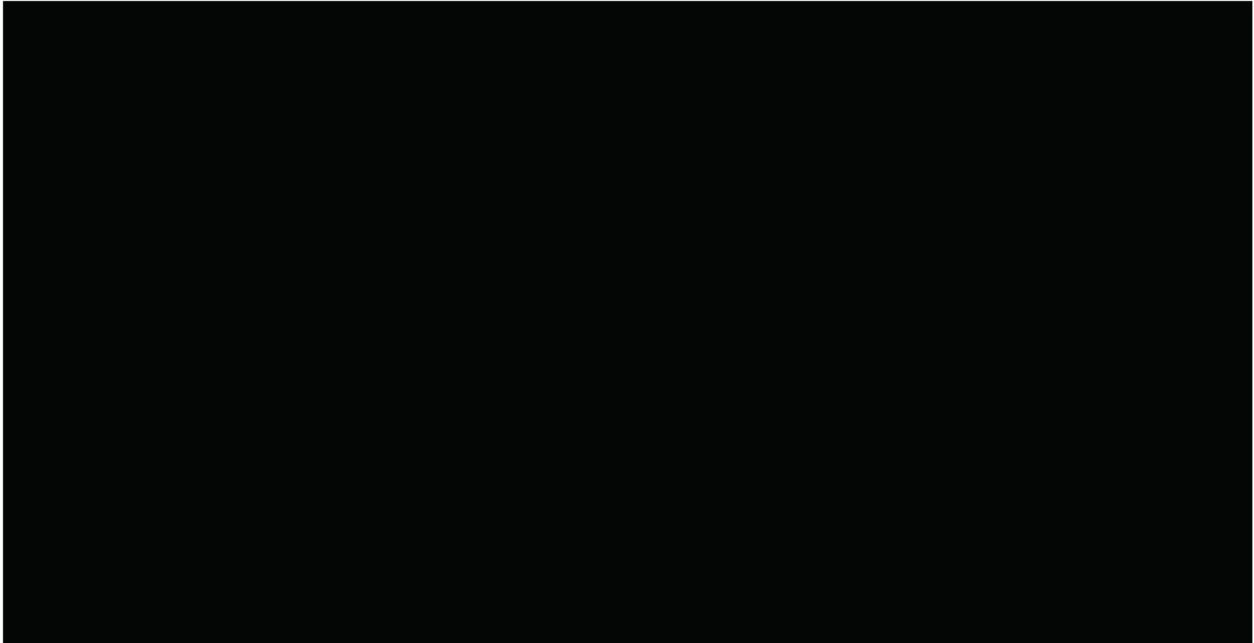
Providing a global Sports Wagering Platform to a global network of partners requires Kambi to maintain a leading product offering across all sports, not only the core US sports. The additional revenue a strong global product would bring to New York State would be crucial in order to meet budget targets. 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 of 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 benefit to having a Sports Wagering Platform provider that can offer quality right through the longtail of sports. Kambi is able to 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.

Factor: Bettors' affinity with 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.

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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] of all revenue the last six quarters, again reflecting the affinity that bettors on the East Coast have for Kambi's product. [REDACTED]

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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 approximately 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. 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.

This sentiment holds true across all states that publicly report their sports betting revenues to the operator level. Evidenced in the below graph, you can see that Kambi takes a significant share across all the publicly publishing states.

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As you can see above, Kambi has successfully navigated a variety of states, with different customer bases and fan demographics. It's also important to note that Kambi Sportsbooks have drawn in customers amid considerable competition. Even in the most competitive markets where there are double digit online sportsbooks, Kambi Operators combine for at least [REDACTED] of market share, highlighting the ability to attract bettors amongst a swarm of alternative options.

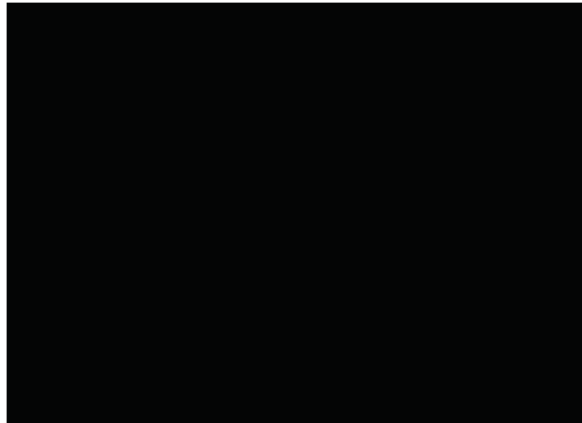


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Factor: Kambi's New York Performance to Date

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The State of New York has always been an important one to Kambi, where it is 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 \$ [REDACTED]. This amounts [REDACTED] 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 [REDACTED]

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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.

Factor: Localization and Personalization of Operators

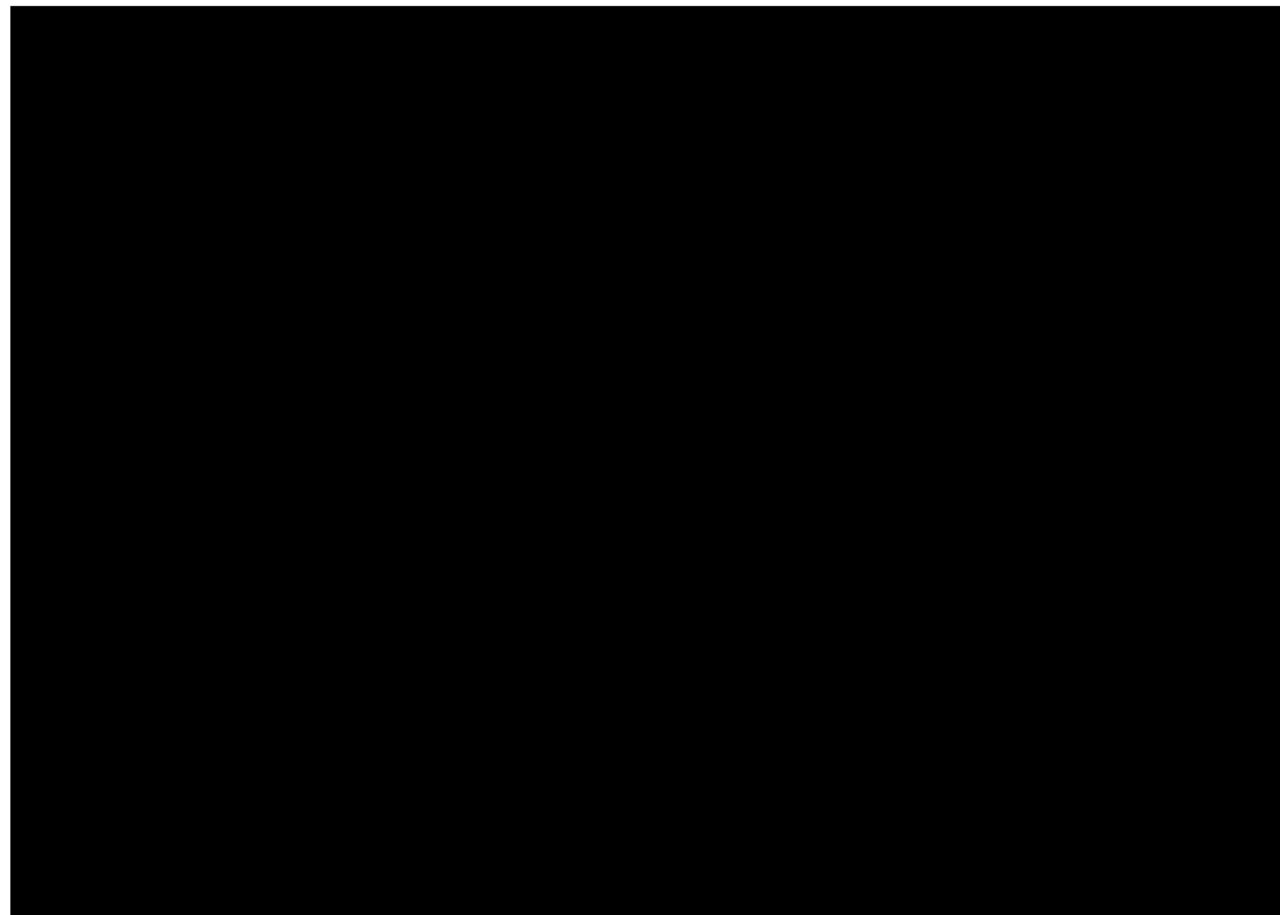
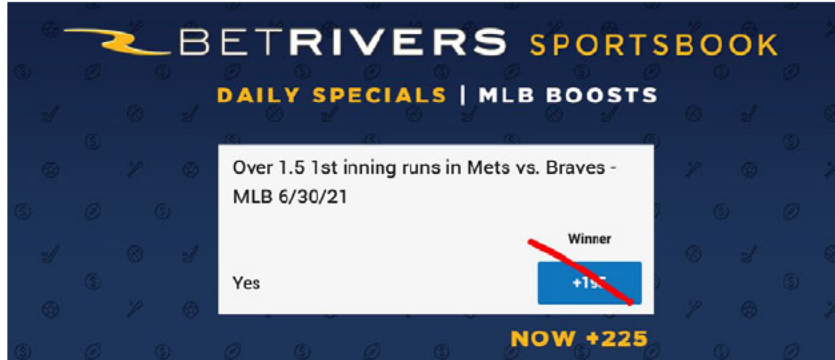
Kambi manages and operates the offering fully in-house, including all software and most importantly, the traders who operate it. Kambi's traders ensure 24/7/365 coverage. These sport experts not only have an advanced understanding of Kambi's platform, tools, and the sports they trade, but they also have a localized expertise.

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Just a short distance from New York, Kambi's Philadelphia traders, which make up about [REDACTED] of Kambi's Philadelphia office, can configure a localized offering that caters to the exact needs of

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New York sports fans, such as the below Mets odds boost, seen just last month on the BetRivers Sportsbook.



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6.2 EXPERTISE

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

Section 6.2.A – Summary on Behalf of All Platform Provider Applicants

Our Platform Provider Applicants are experts in online and mobile sports wagering. Collectively, our Platforms have over 40 live deployments in regulated U.S. jurisdictions. Our Platforms are also proven globally with some of the world's largest online and mobile sports wagering operators. Our Platform Provider submissions for 6.2.A covering the individual Applicants will provide key details on each Platform's technical and Operator support features, operation, support & maintenance capabilities, and differentiating characteristics. We are confident the Commission will conclude that our proposed set of Platforms are:

- Highly scalable, secure, and dependable
- Built to U.S. compliance standards
- Capable of supporting Operator differentiation
- Maintained and invested in by strong organizations

Highly scalable, secure, and dependable

Nothing matters more to a regulated online sports wagering operation than the scalability, security, and dependability of its Platform. Platforms must be built to reliably handle significant traffic during major sporting events such as the Super Bowl. Sports wagering Operators heavily depend on this basic function to earn revenue and retain patrons. All this must be achieved while ensuring robust protection of sensitive patron information. In addition, our platforms are designed for day one market launches, quickly transferring players from the illegal market to the legalized one. All our Applicants have proven their ability to deploy quickly and operate to very high standards in live U.S. environments:

- Kambi's sports wagering platform is active in 6 continents. This global experience highlights the expertise of Kambi's operations, flexible to the consumer needs in any corner of the globe. 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.
- Caesars' Liberty platform was specifically built to be scalable for the U.S. market. It is currently deployed in eight states, with several more expected before the end of 2021. Liberty utilizes modern, modular architecture that is API-driven, and designed to scale and adapt to the regulatory and reporting requirements of each state. It was developed to enable quick speed to market and large transaction volumes. The platform includes Caesars' pricing and trading operations, which are also fully owned.
- PointsBet is uniquely positioned as its sportsbook platform is a proprietary, managed technology across all elements, both front and back end. The platform employs a modern code base and is a proven technology in the US sports betting marketplace including across peak days in high volume transaction environments. The company's technology and development teams facilitate agile, custom, quick to market innovation, including all technical regulatory requirements.
- WynnBET's Platform technology, including licensed technology from Scientific Games, has supported the world's largest bookmakers during the world's largest betting events, including the Super Bowl and Cheltenham Festival. It is arguably the most tested betting Platform technology in the world. It has supported over 470 million account transactions and 60K bets per minute during a single major sporting event, all with 100% uptime.

Built to U.S. compliance standards

As noted above, our Platforms have collectively more than 40 live deployments in regulated U.S. jurisdictions. Our consortium has proven its ability to deliver to the demanding specifications of U.S. regulators. Our Platforms are all required to provide for robust patron verification procedures, geolocation requirements, responsible gaming standards, and high levels of security. All our Platforms have been rigorously tested to these requirements and approved by multiple independent testing labs, including the state-run testing lab in New Jersey.

Capable of supporting Operator differentiation

All our Platforms enable an Operator to perform the basic functions of a sports wagering operation reliably and with seamless execution, including: registering and verifying a patron, funding patron accounts, accounting for patron activity, presenting a wide selection of wagering opportunities, offering bonuses and promotions, processing wagers and managing risk, and reporting for business and regulatory needs. However, our Platforms go well beyond meeting basic Operator needs. Each of our Platforms is characterized by differentiating features that position an Operator to excel in growing its market share. Below is just a sample of what each Platform Provider uniquely offers:

- Kambi is 100% focused on being a Sports Wagering Platform supplier and is therefore unique in having a strong and vast network of operators in regulated markets across the world on its platform. The success Kambi delivers is anchored in its ability to leverage its network data from a global player base, creating increased network advantages as each new partner is added and existing partners grow.
- Caesars' Liberty platform is integrated with Caesars Rewards, the largest gaming loyalty program in the country, allowing customers, win or lose, to earn Rewards Credits that be redeemed seamlessly for hotel stays, dining and other experiences at more than 50 properties across the country and for other curated experiences through Caesars' numerous sports and entertainment partners.
- PointsBet's Platform and operator experts excel in many areas but capabilities across the risk management, product innovation, content management and reporting functions are specifically notable. The competitive advantages over the long term provided by these unique Platform capabilities which support the Operators accordingly will generate compound returns to the state.
- WynnBET's Platform supports innovative social interaction features and integrates Wynn Rewards, an omni-channel loyalty and bonusing program that will provide New York residents with unmatched access to Wynn's 5-star destination resorts.

Maintained and invested in by strong organizations

The Commission is making a long-term decision for the State of New York and its residents. Given the potential for a 10-year license, our Platform Applicants are well positioned to apply their Platform expertise not just at the time of award but over the long haul. For such a commitment to matter, it needs to come from exceptionally strong organizations that are financially capable of investing R&D into improving and supporting their Platforms. Our Platform Applicants fit this profile:

- Kambi has been publicly traded on First North at Nasdaq Stockholm since 2014. Kambi generated over \$200 million in revenues over the past 12 months and has a strong liquidity position with over \$100 million of cash on balance sheet.
- Caesars, which acquired William Hill, is the nation's largest casino-entertainment operator maintaining approximately \$3.2 billion of cash and revolving borrowing capacity.
- PointsBet is publicly traded with \$501M of cash and no corporate debt which positions it to continue investing aggressively in its technology and product enhancement.
- WynnBET is majority owned and controlled by Wynn Resorts. Wynn Resorts maintains \$4 billion of liquidity globally with an additional ~\$640 million available to WynnBET upon closing its recently announced de-SPAC transaction.

We have a great deal of confidence in our Platform Applicants' expertise in online and mobile sports wagering. Our collection of proposed Platforms in aggregate is the most proven at scale in the world. We

have extensive expertise in deploying our Platforms and supporting them in U.S. markets to meet the most demanding regulatory standards. We hope the Commission develops the same confidence in our collective abilities as we frame our independent Applicant profiles and responses in the remainder of section 6.2.A.

Kambi Expertise

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 optimise 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 such as Rush Street Interactive 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 approximately 1,000 sports fans, nearly 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 Rush Street Interactive. 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.

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

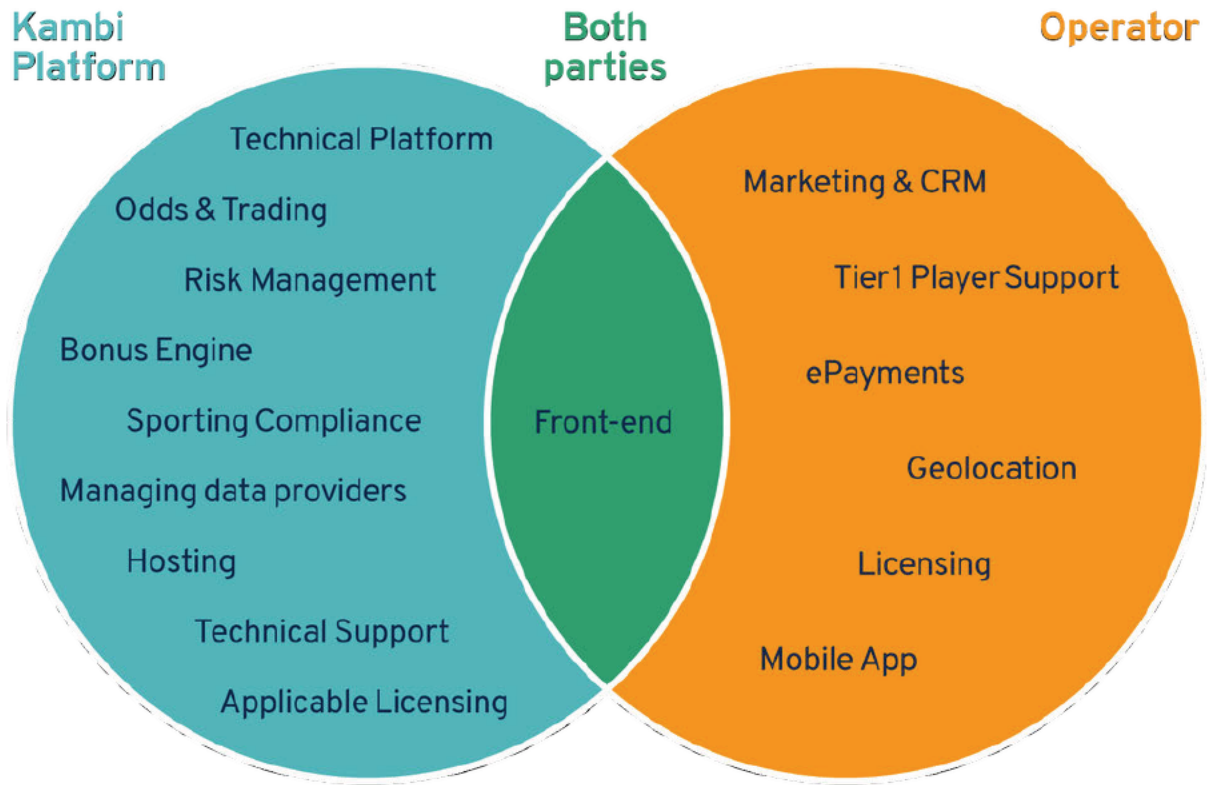
The Kambi Sports Wagering Platform

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 which 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 which will deliver the greatest impact. See below for the sports betting value chain and where Kambi and its partners sit within it.





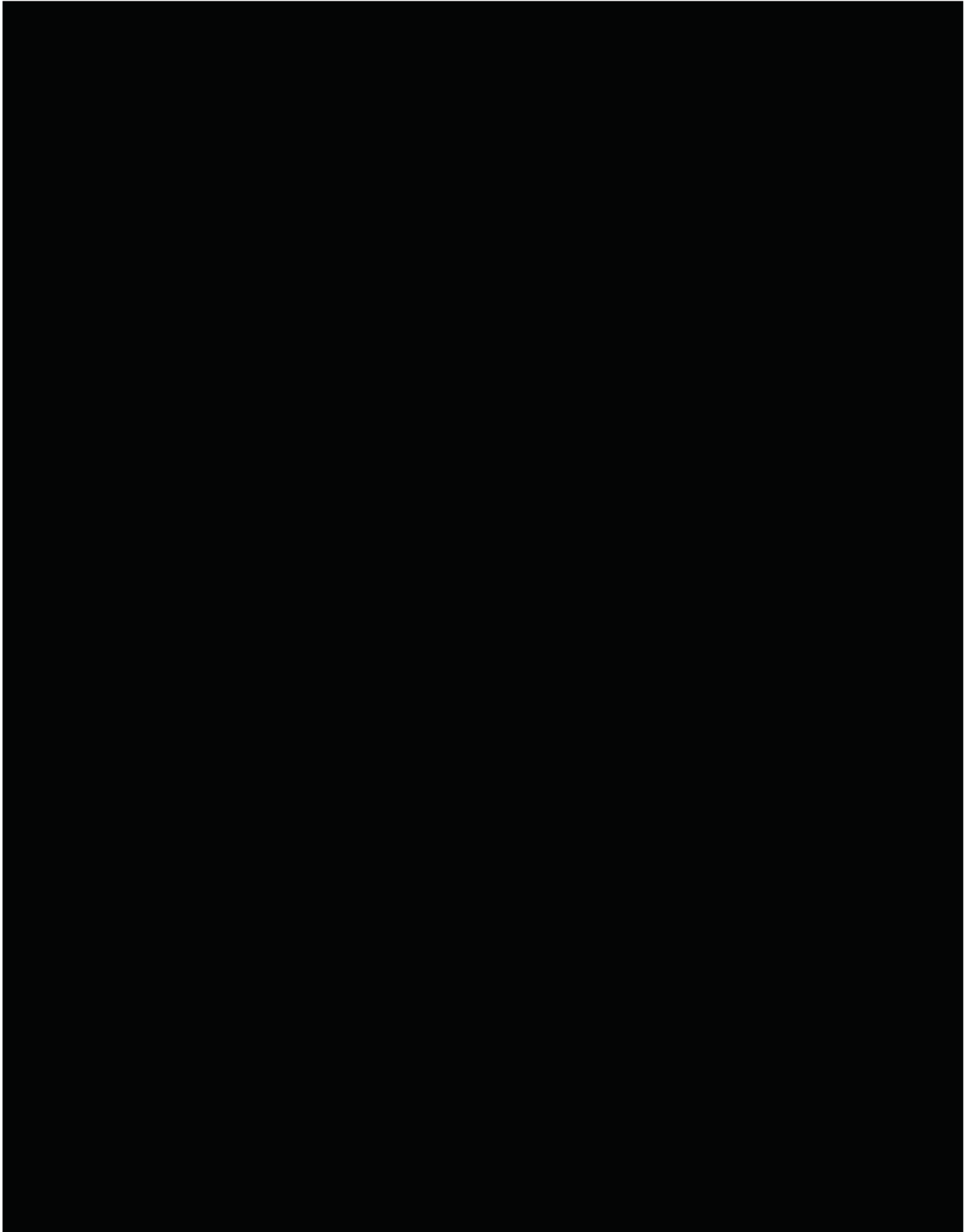
In the sections below, we will give an overview of some of the technical features and operations that make up the Kambi Sports Wagering Platform:

Technical Platform

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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.

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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.

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

Kambi's Sports Wagering Platform allows for its operators, such as Rush Street Interactive, to set a risk strategy that works for them. This way, no matter the desired approach to market launch, Rush Street Interactive 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 inputs from Rush Street Interactive 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.

Kambi Bonus Capabilities



Differentiation
Stand out from competition

Localization
Target specific markets

Personalization
Tailor your Offering to specific segments

Reward Types



Free bet



Profit boost



Odds boost



Use profit boost to build Parlay bonuses. Reward players with bigger boosts when adding more games into a parlay.

Examples of restrictions and stipulations include:

- By State
- By Offering Type
- By Risk Exposure
- By Sign-up Date

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Bonuses are an effective way to engage and retain players.

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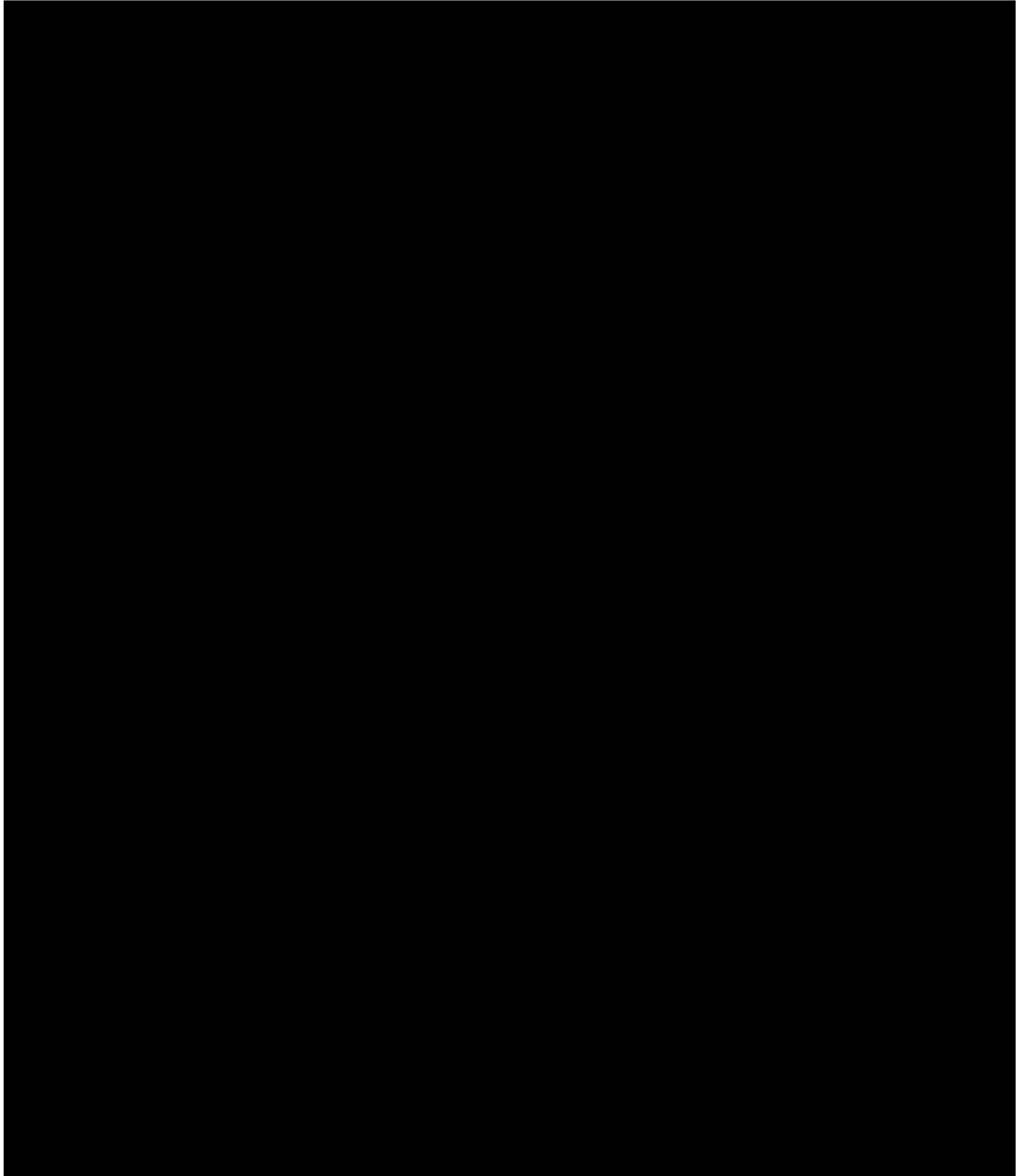
Sporting compliance

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.

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





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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.

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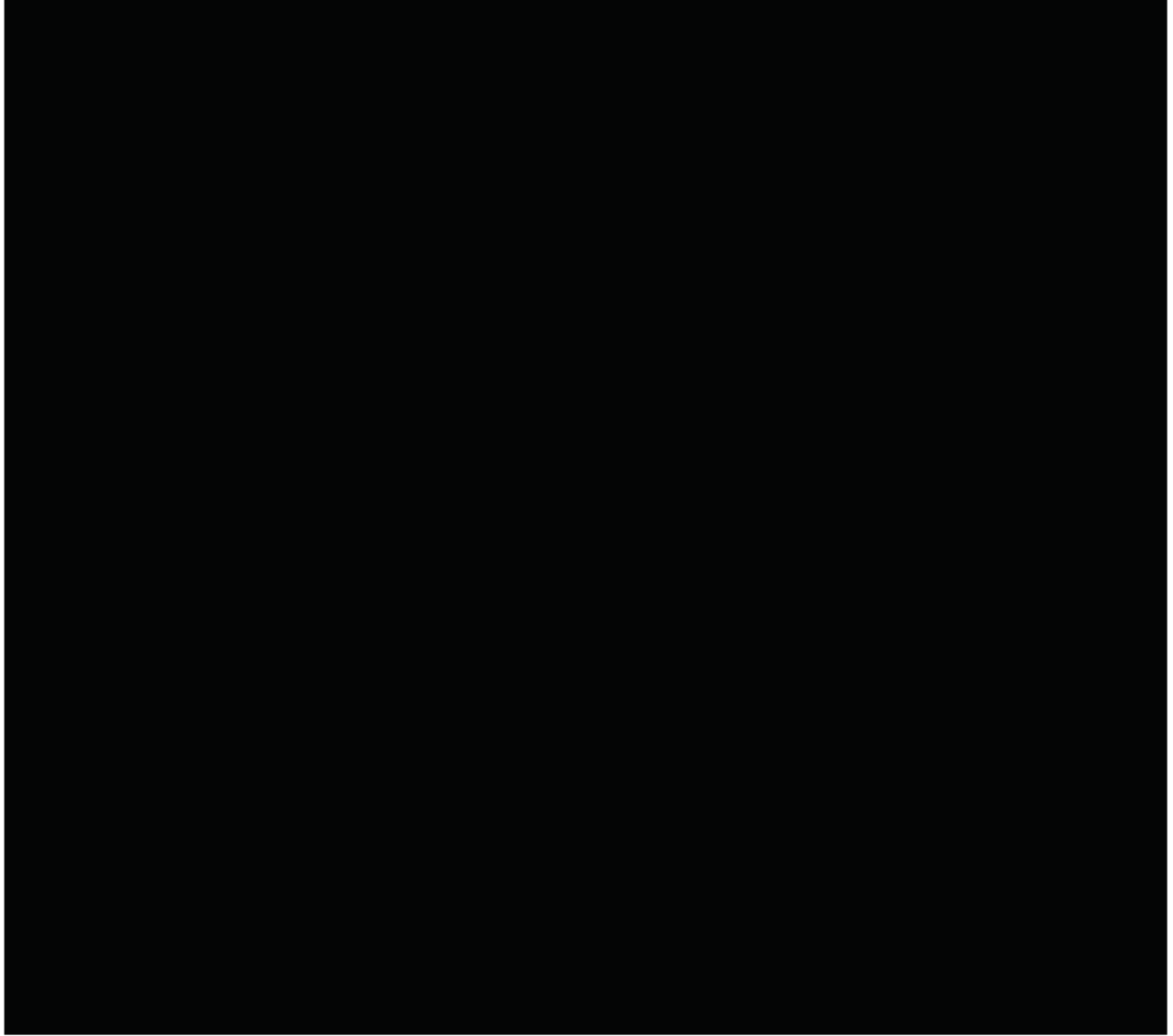
The operator is responsible for the player data, authentication and payments. This means that the operator is responsible for authenticating a patron before he/she can place a bet (KYC) and keep track of their funds (the wallet).



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Bet Acceptance Flow

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6.2.A 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:

1. Reviewing current SLAs and seeing where improvement can be made to enhance Kambi's offering
2. Reviewing, through customer feedback, areas where improvements can be made. This can be done through regular meetings with partner managers.
3. Reviewing incident and problem management tickets monthly to see where improvements can be made
4. Researching innovative technologies that will enhance Kambi's IT service
5. Looking at more cost-effective IT solutions that will provide both customer and supplier enhancements
6. 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 also 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.

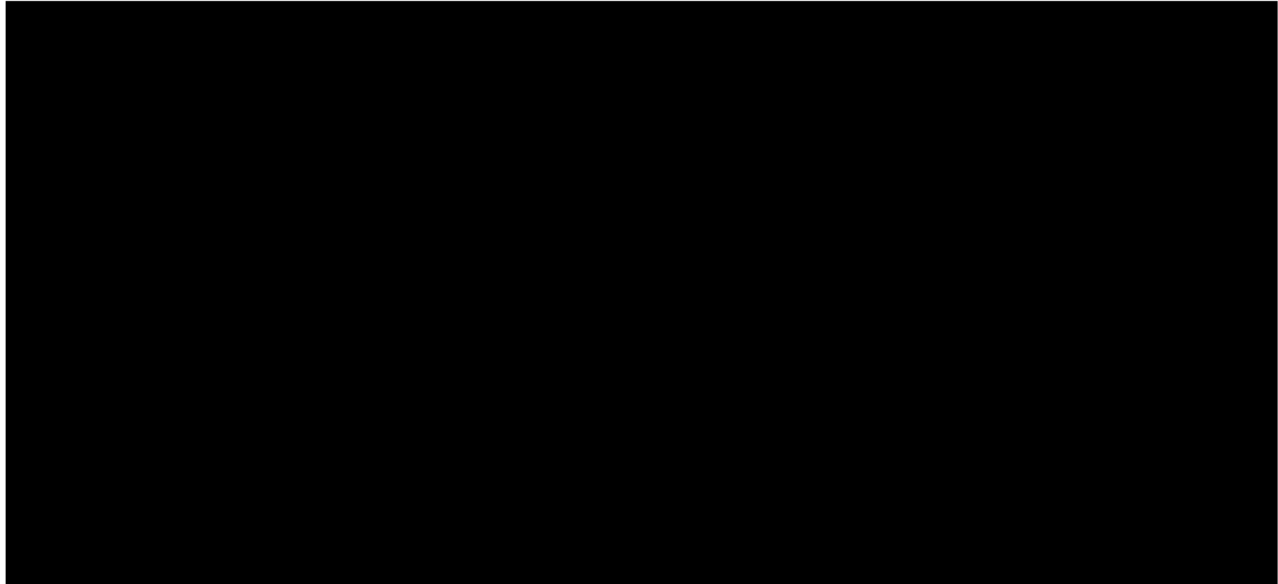
Further non-functional requirements that all components must meet are related to observability and traceability, this allows our 24/7 Network Operation Center (NOC) team to maintain high awareness of the current state of the system and rapidly respond should any monitoring indicate action is needed.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

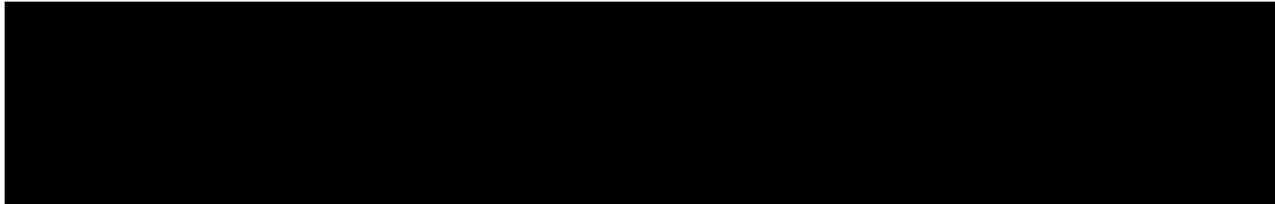
Kambi has a robust capacity planning function that spans across business units that uses historical data and predictive modelling to ensure our technology is prepared for future load. Our development teams actively test our software against high load scenarios to ensure we have ability to meet future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

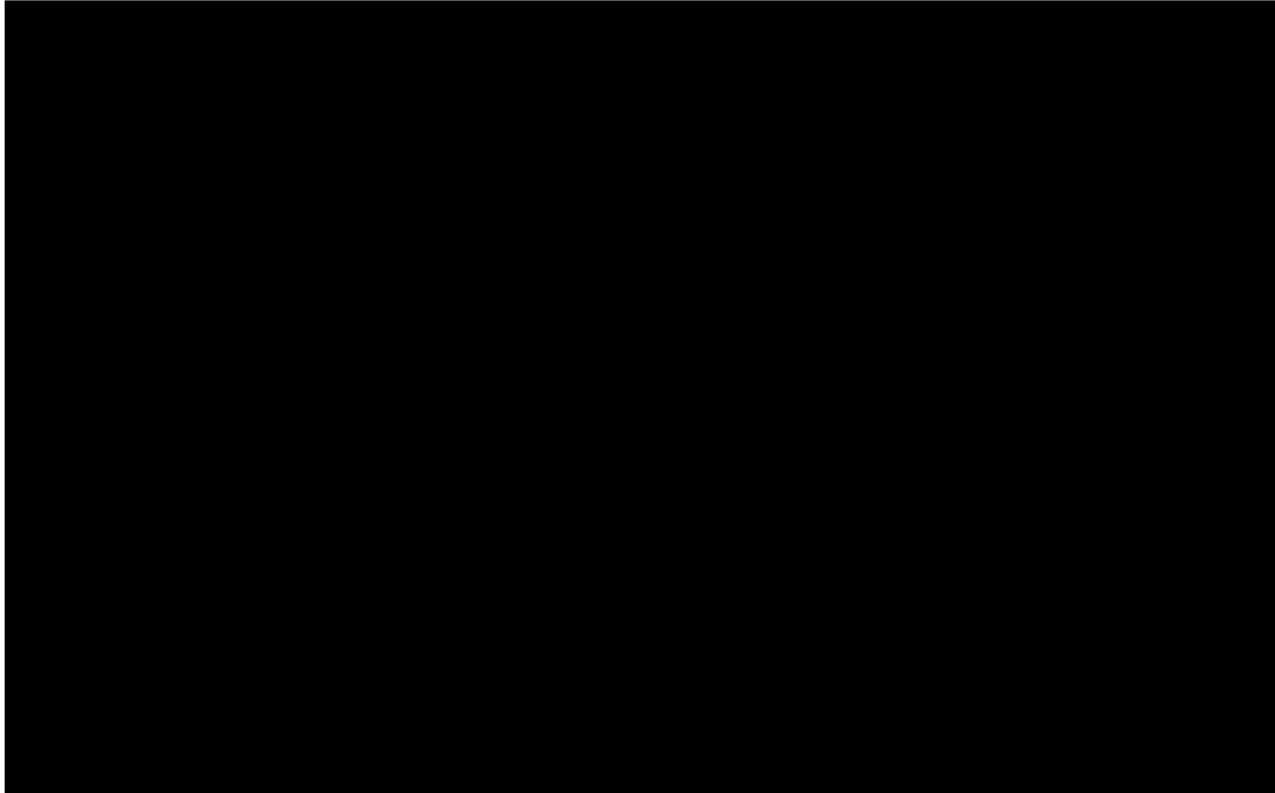
Constant evolution of trading models

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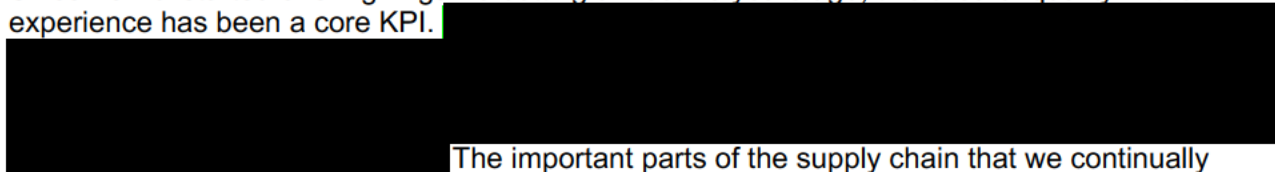


Increased automation and accuracy of player profiling to optimize revenue

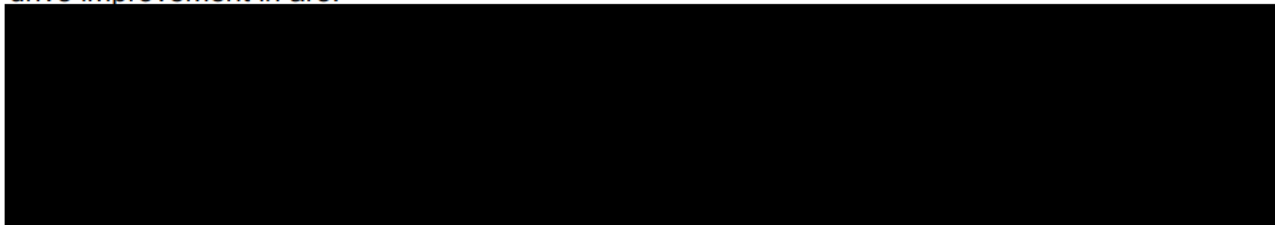


Driving down suspension times and rejected bets

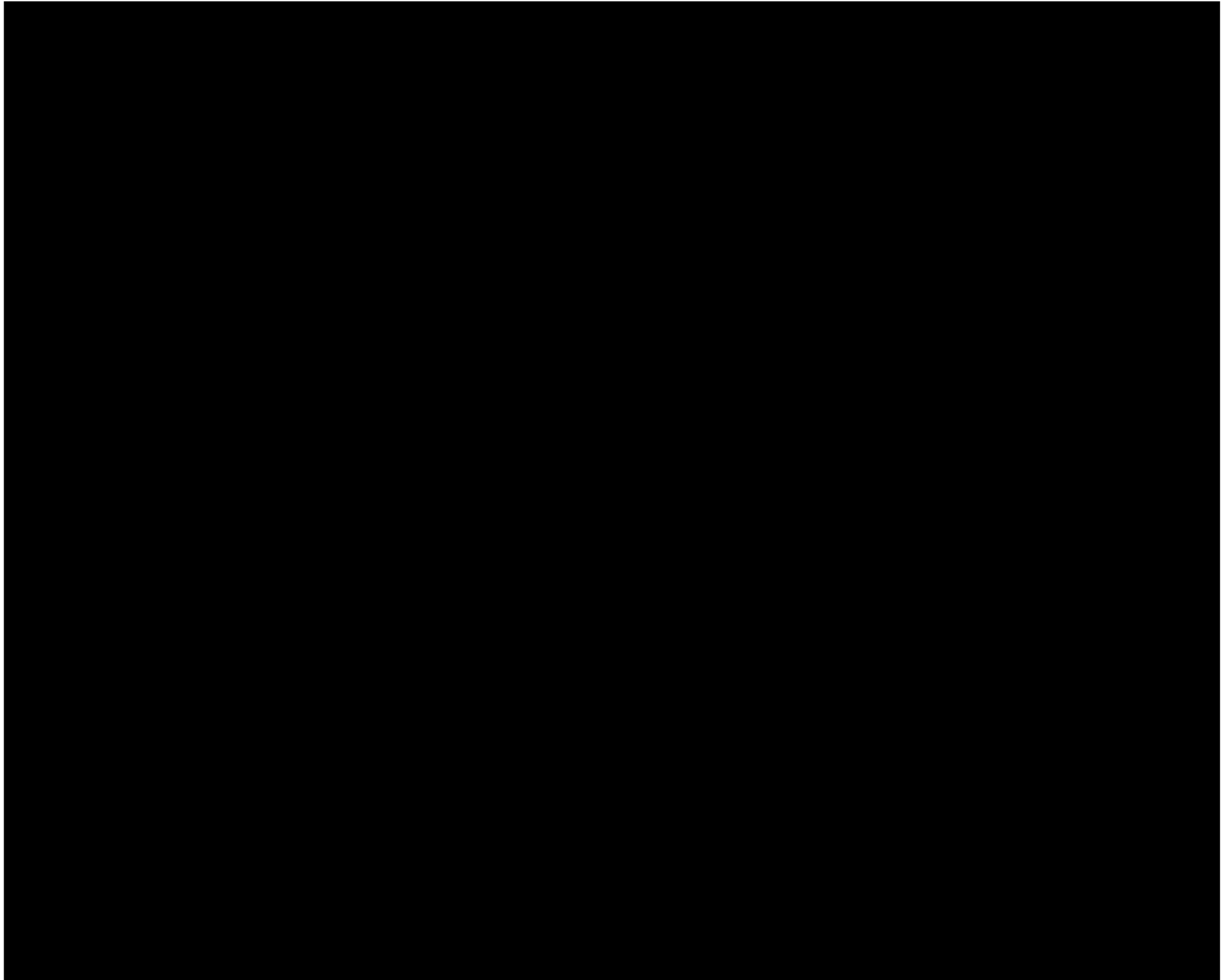
Since Kambi started offering in-game betting almost 20 years ago, this area of quality in the experience has been a core KPI.

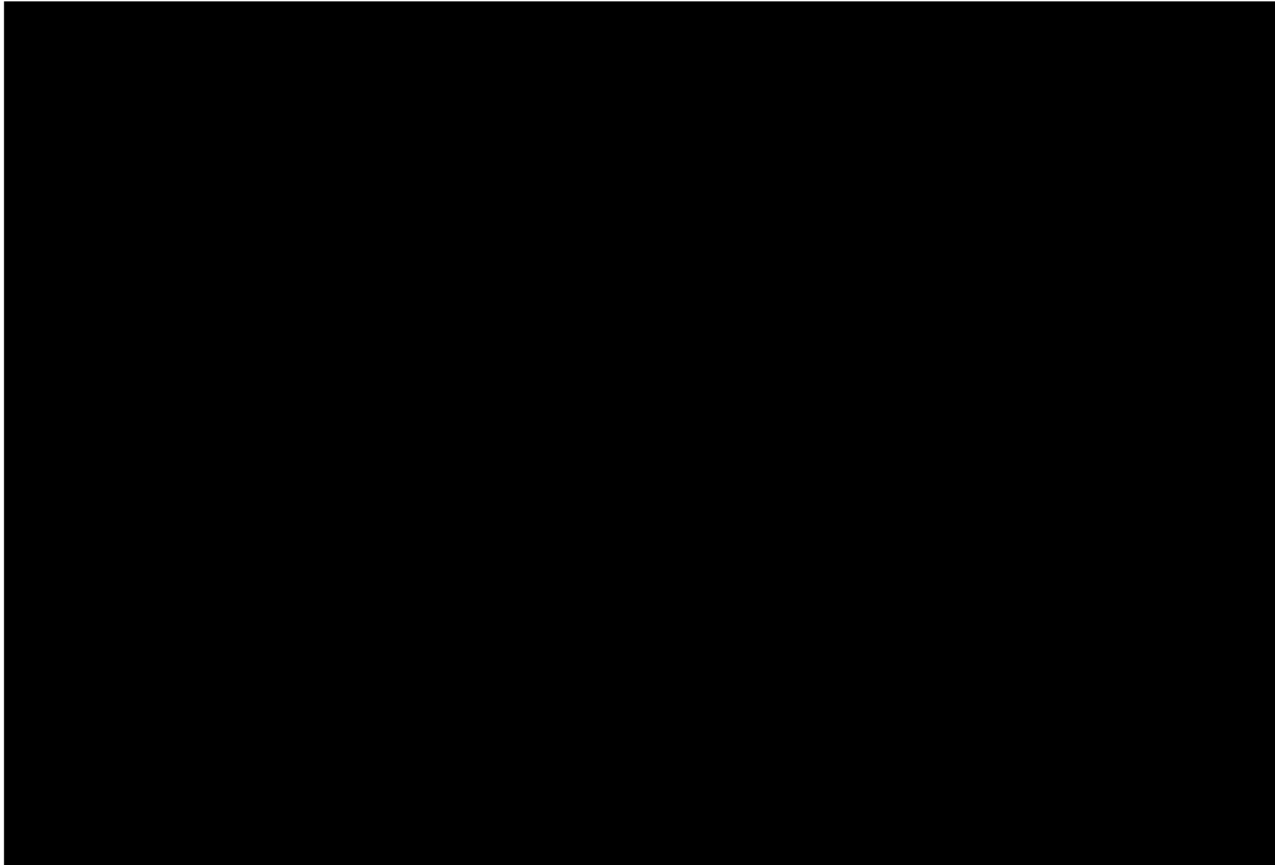


The important parts of the supply chain that we continually drive improvement in are:



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[Kambi and Rush Street Interactive]





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6.2.A 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.

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

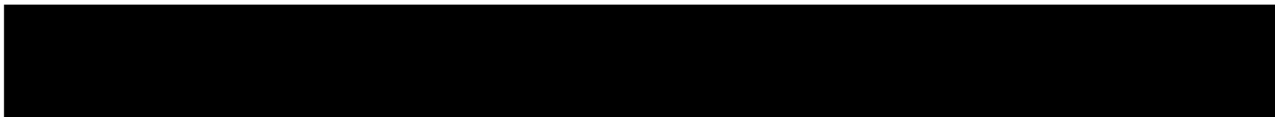
The Kambi Bonus System enables for assignment of different types of rewards directly to players as well as wrap rewards into bonus programs.

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.

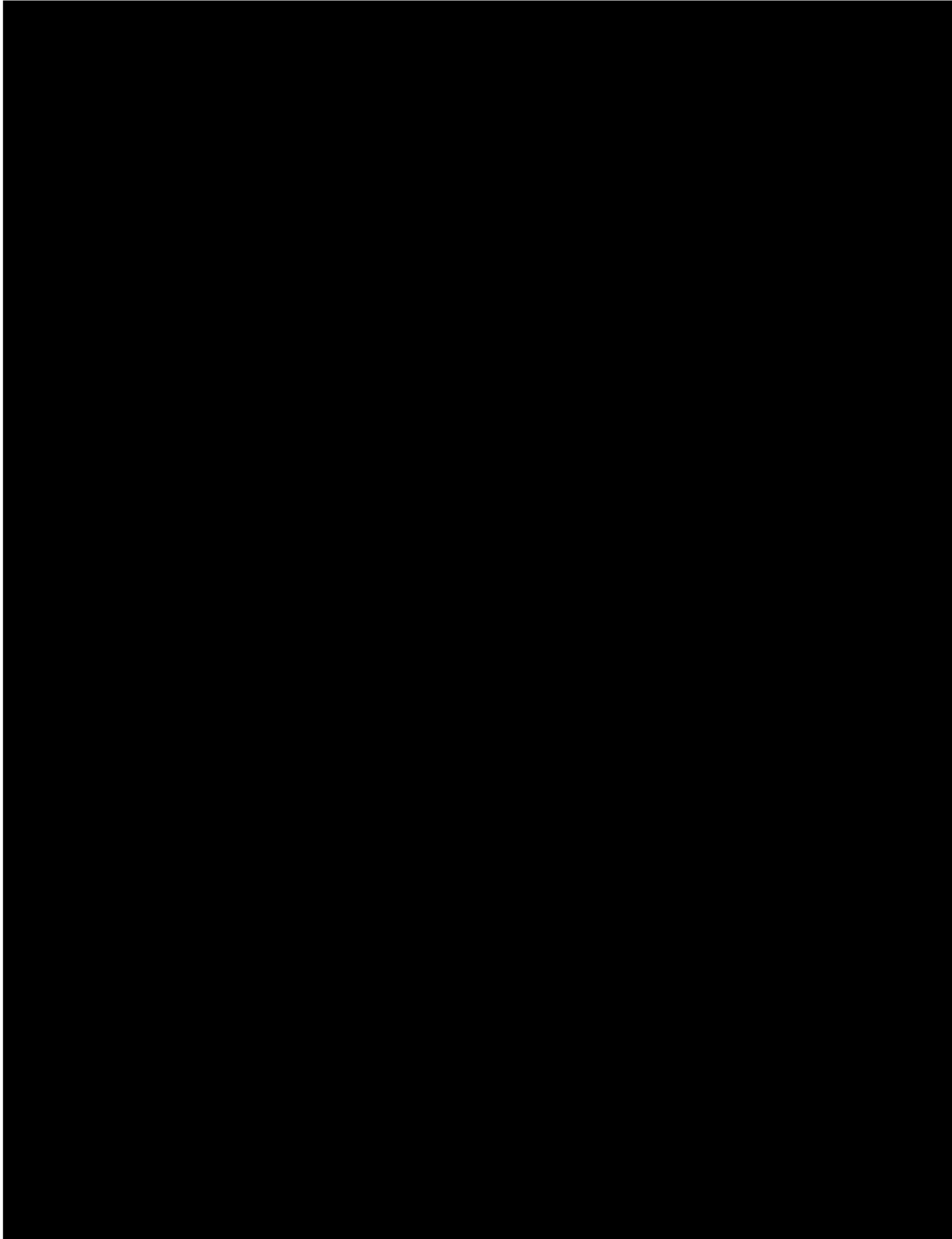
Coupled with Kambi's real-time data APIs, bonus management can be applied in real-time. The main entities in the system are bonus programs and rewards. A reward is the actual bonus that can be used by a player, for example a free bet or profit boost.

Relevancy of bet offers

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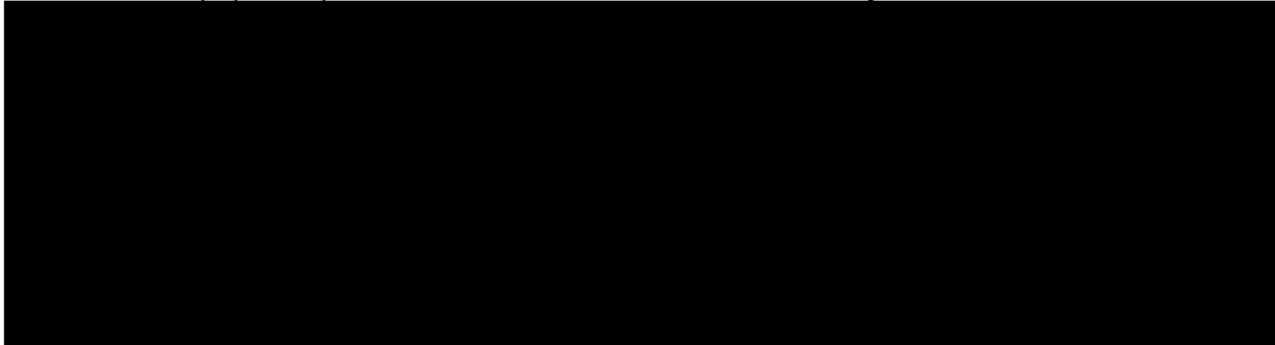
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Provision of leading products and wagering features

Player Performance Props:

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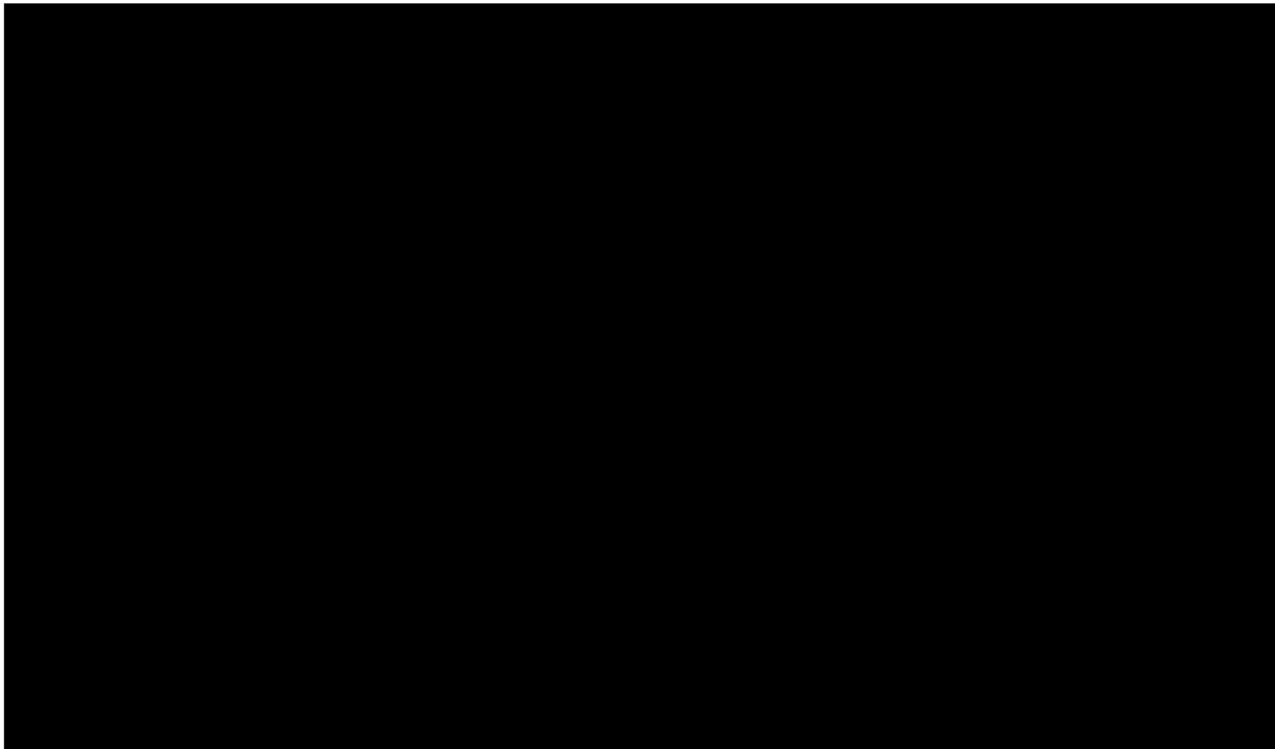
For the most popular sports, such as Basketball, Football, Hockey and Baseball,

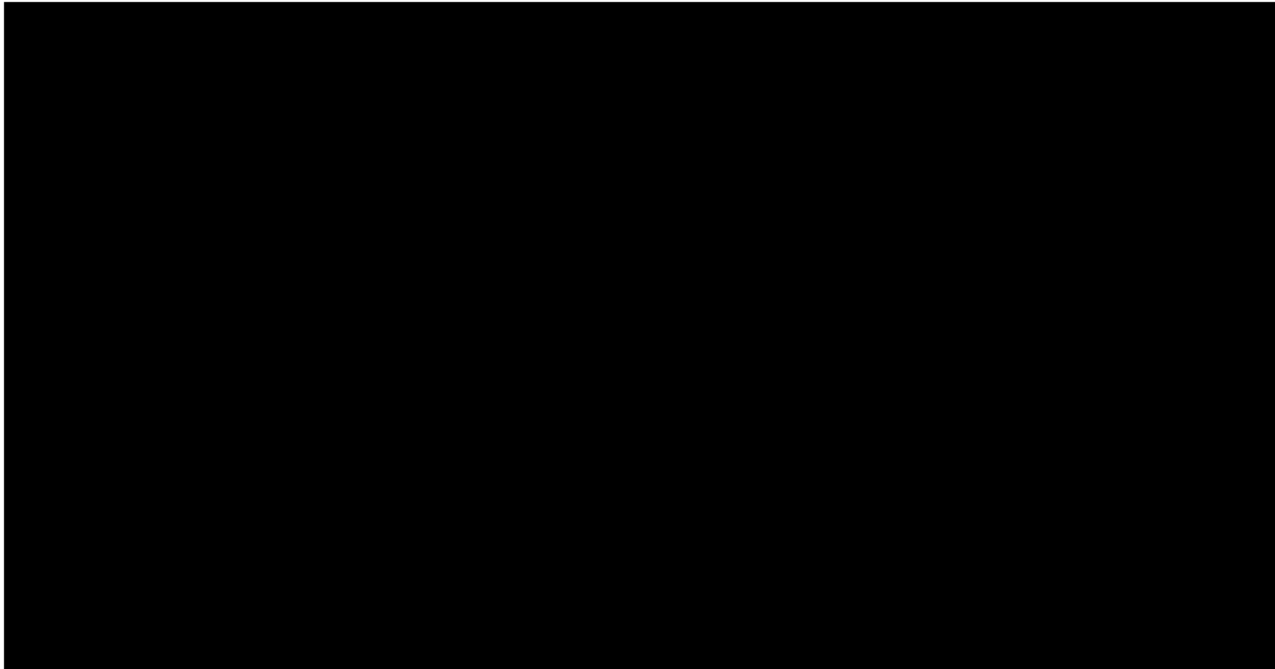


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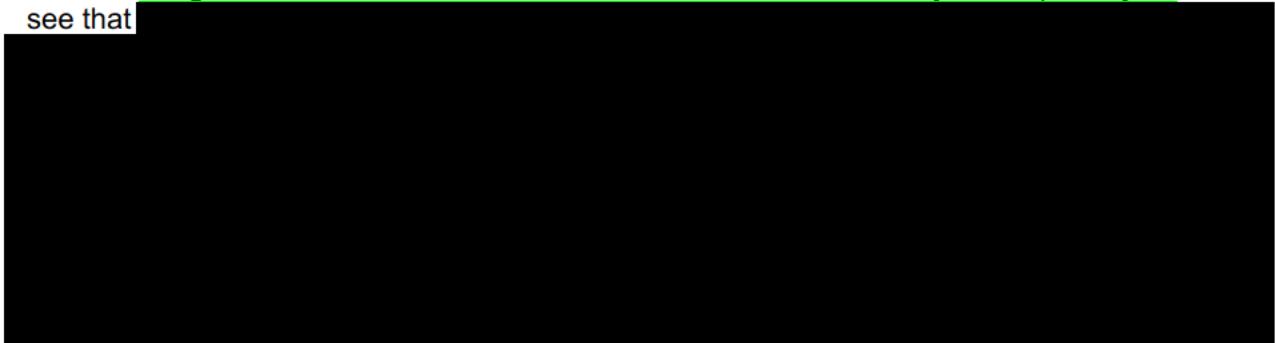
Instant markets

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



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6.2.A 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 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.

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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

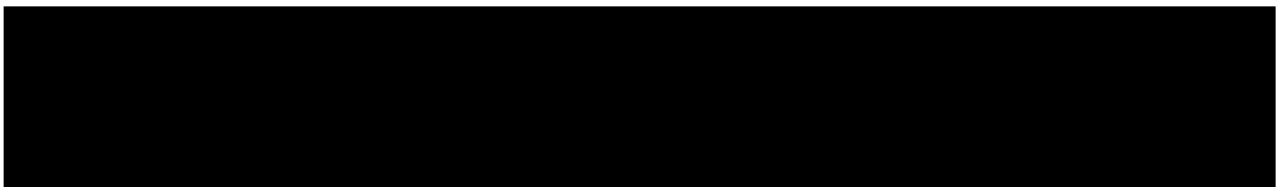
Wager	To win
1.00	1802.10

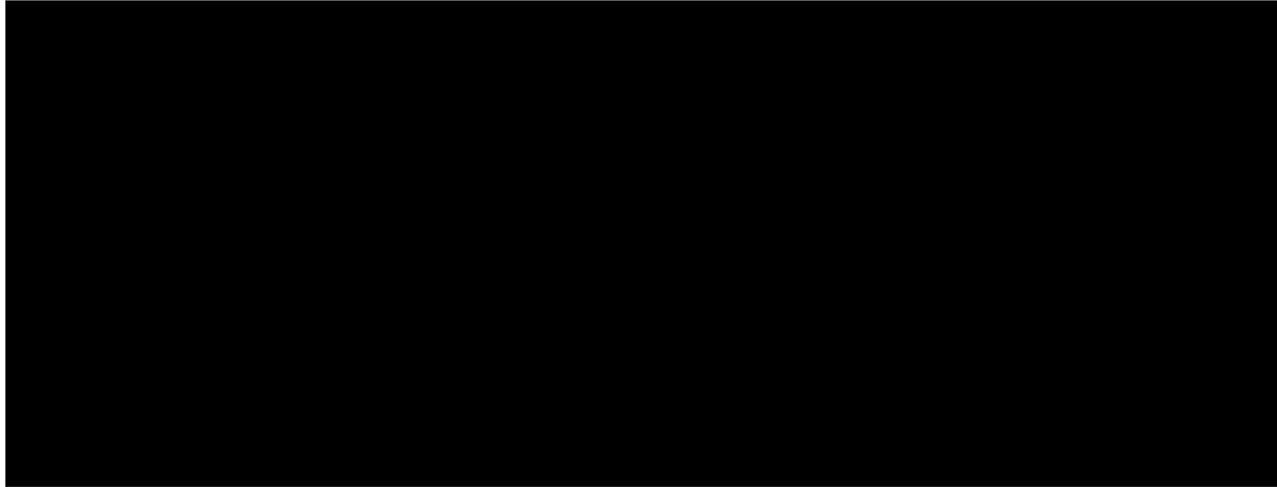
Parlay (8 Picks)

Odds: **1803**

Potential payout: **\$1803.10**

Place bet





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6.2.A 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

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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, finetuned, 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 operators like Rush Street Interactive who use the Kambi platform. This, combined with the efficiency and accuracy of Kambi's models and trading operations, drives market leading revenues and results.

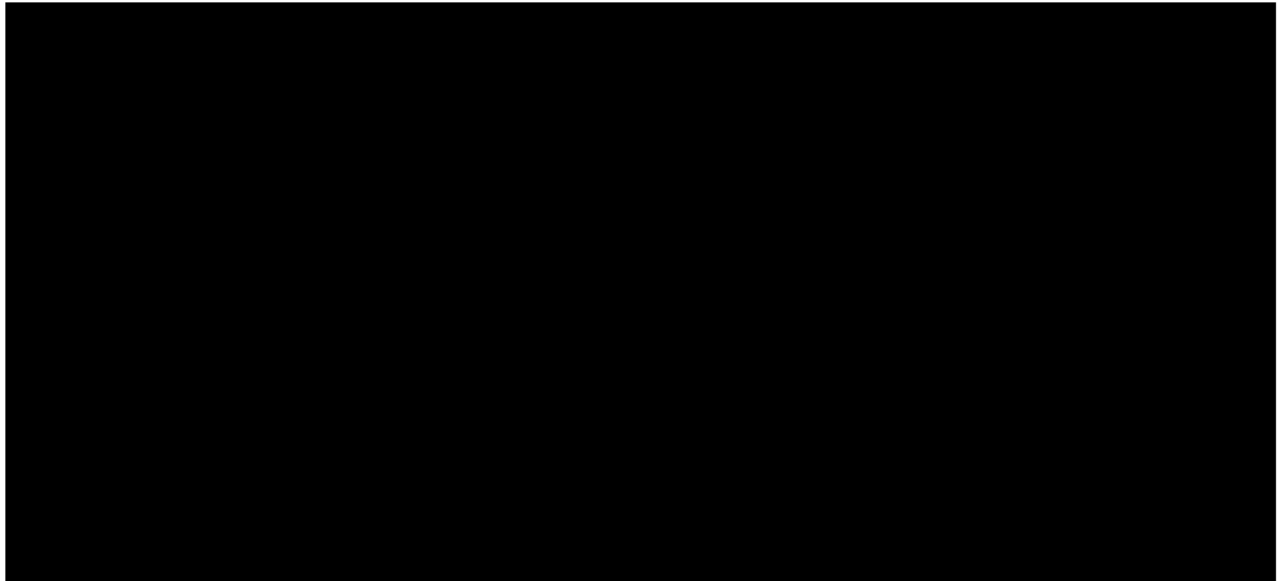
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NFL Super Bowl LV (2021)

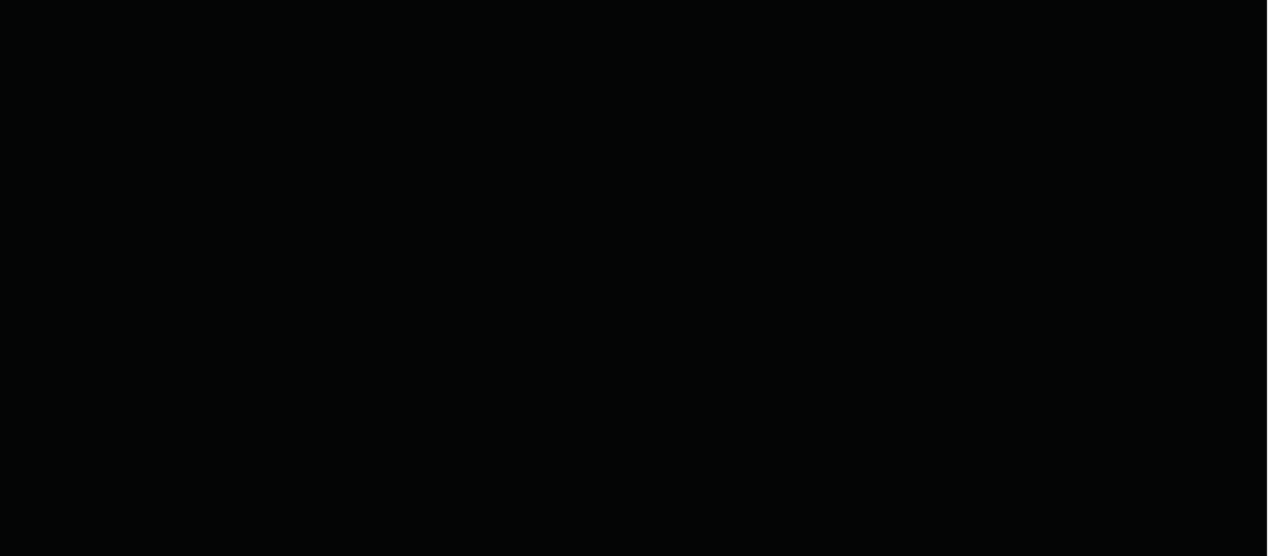
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Above, you can see that this past year's Super Bowl, battled out between the Tampa Bay Buccaneers and the Kansas City Chiefs, was a clear priority for Kambi. Kambi Operators had nearly every imaginable betting offer available to its end users. From 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.

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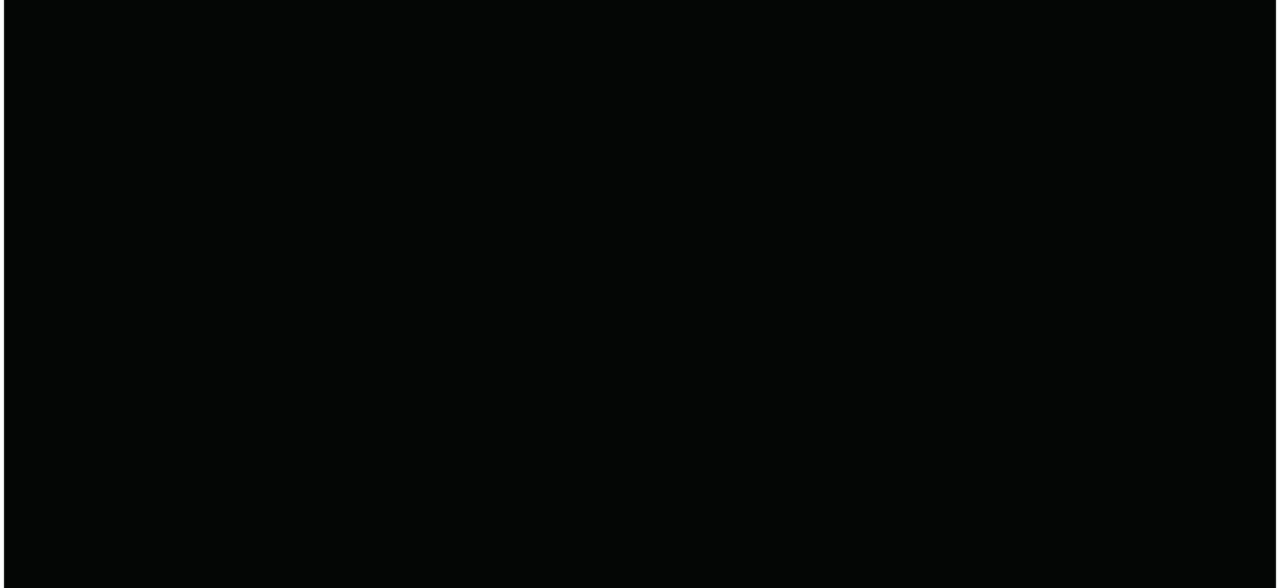
Quantity of offering doesn't tell the whole story. While Kambi had one of the largest offerings, it also provided a chance to display the depth of its in-game product. As you can see, Kambi's instant offering was unique to the market. In a game with such high stakes, where every play matters, this offering 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 Rush Street Interactive will be 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).

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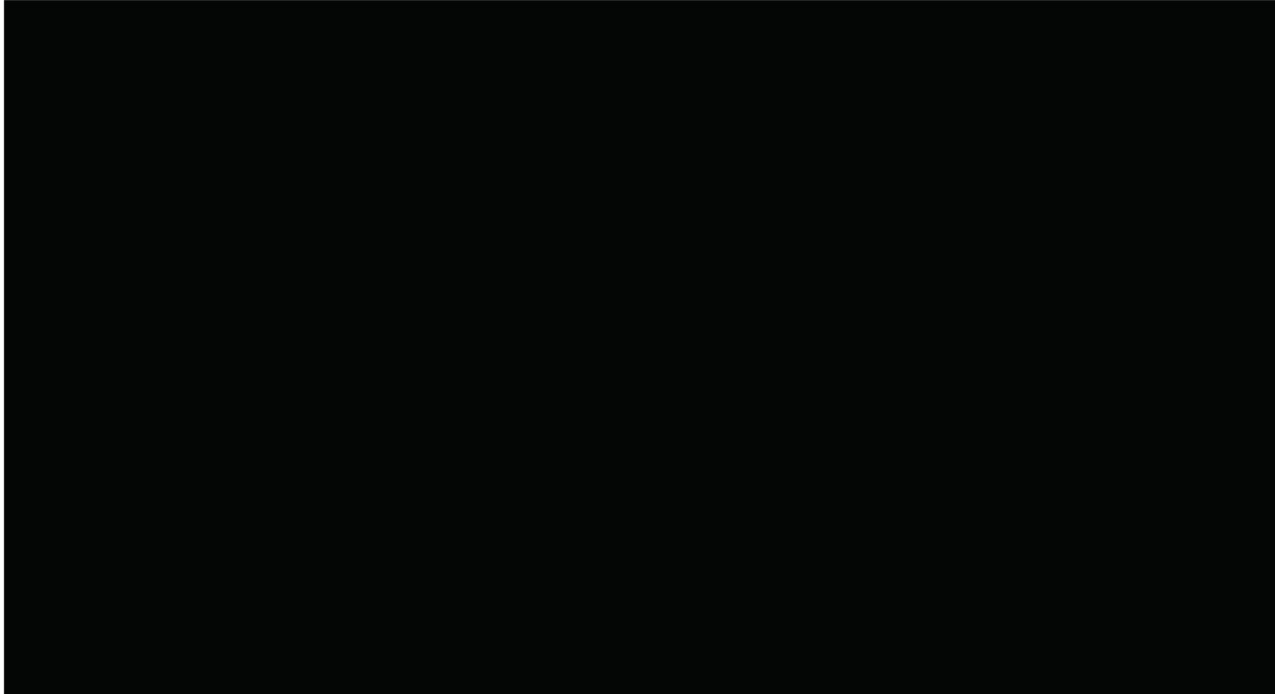
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NHL

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Observed on March 5, 2021,



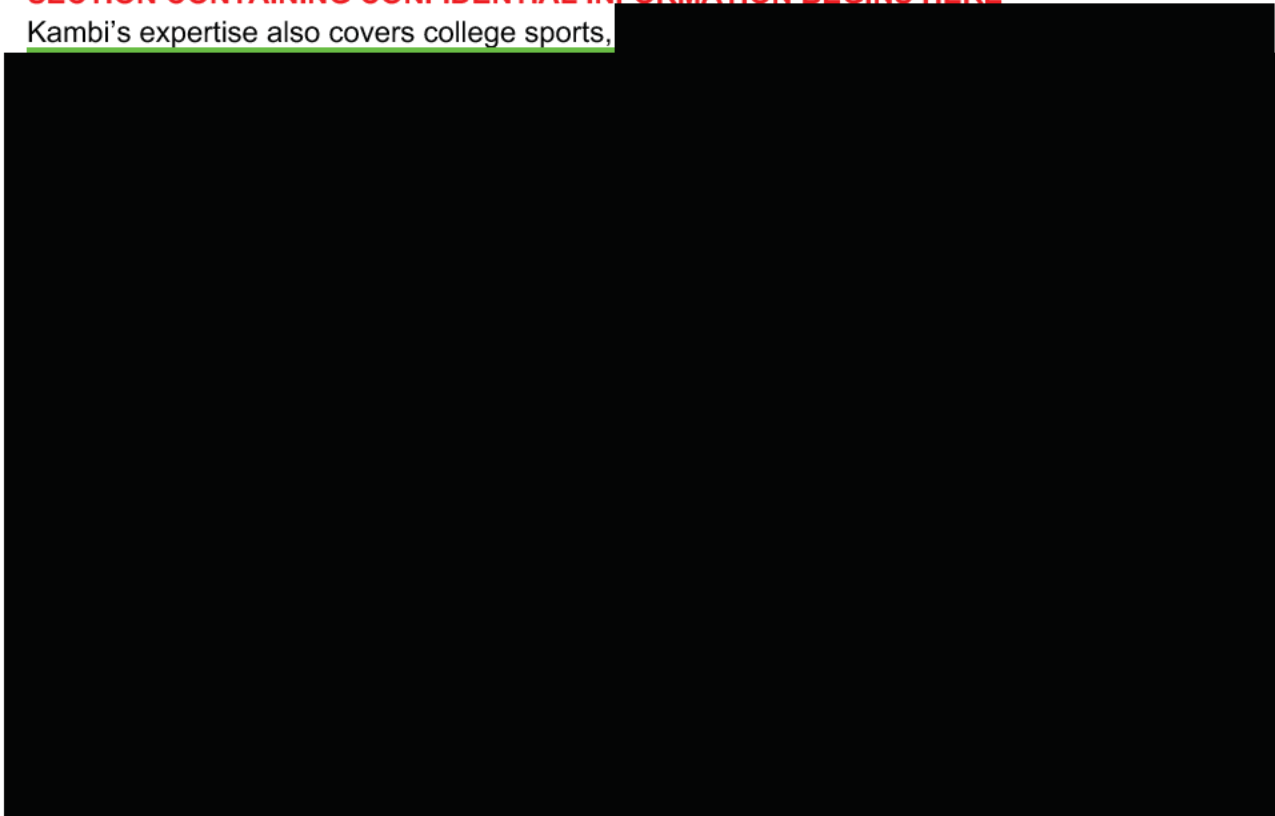


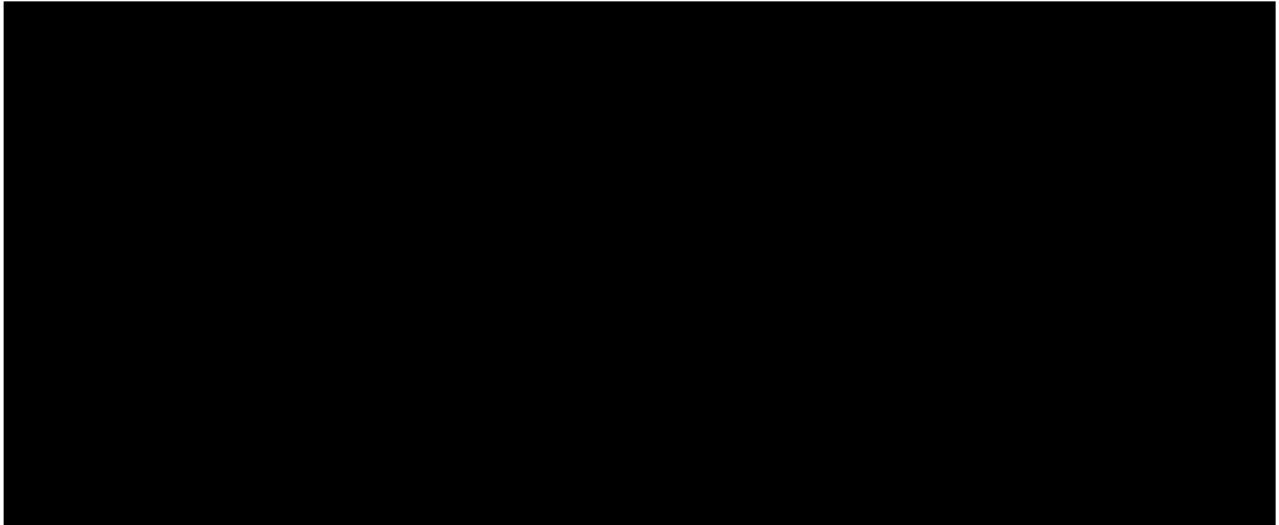
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NCAAF – 2021 National Championship

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Kambi's expertise also covers college sports,



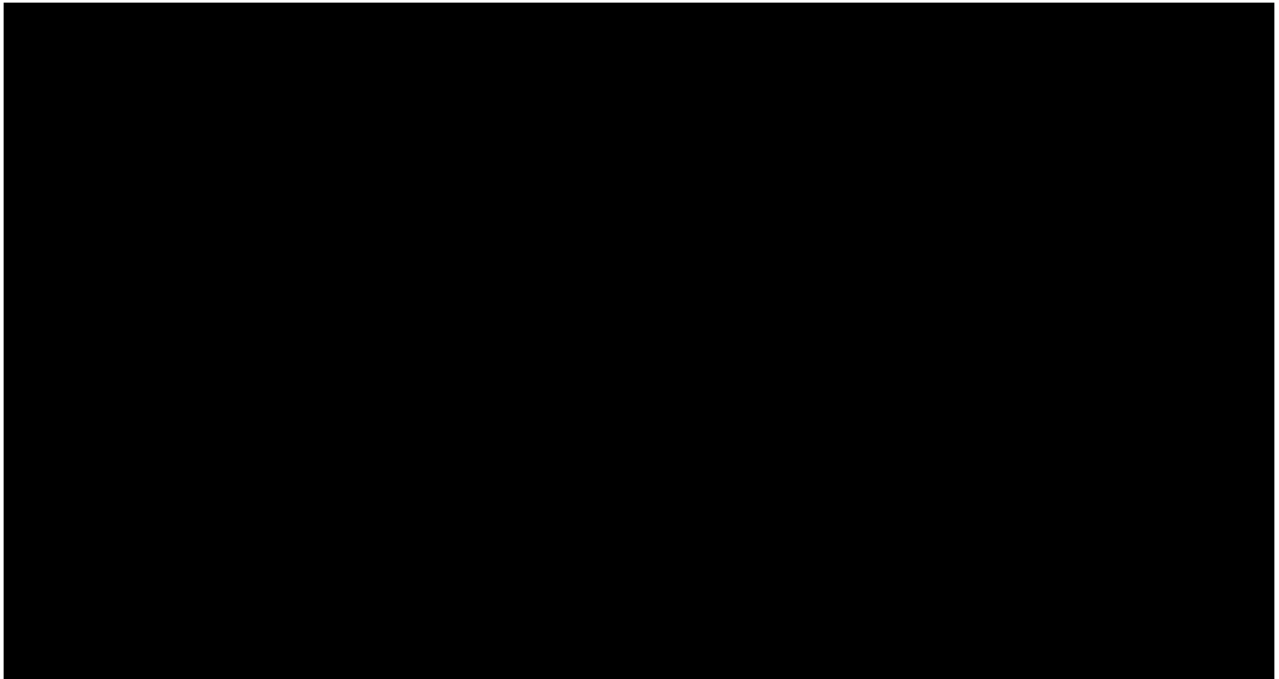


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Suspensions and Availability:

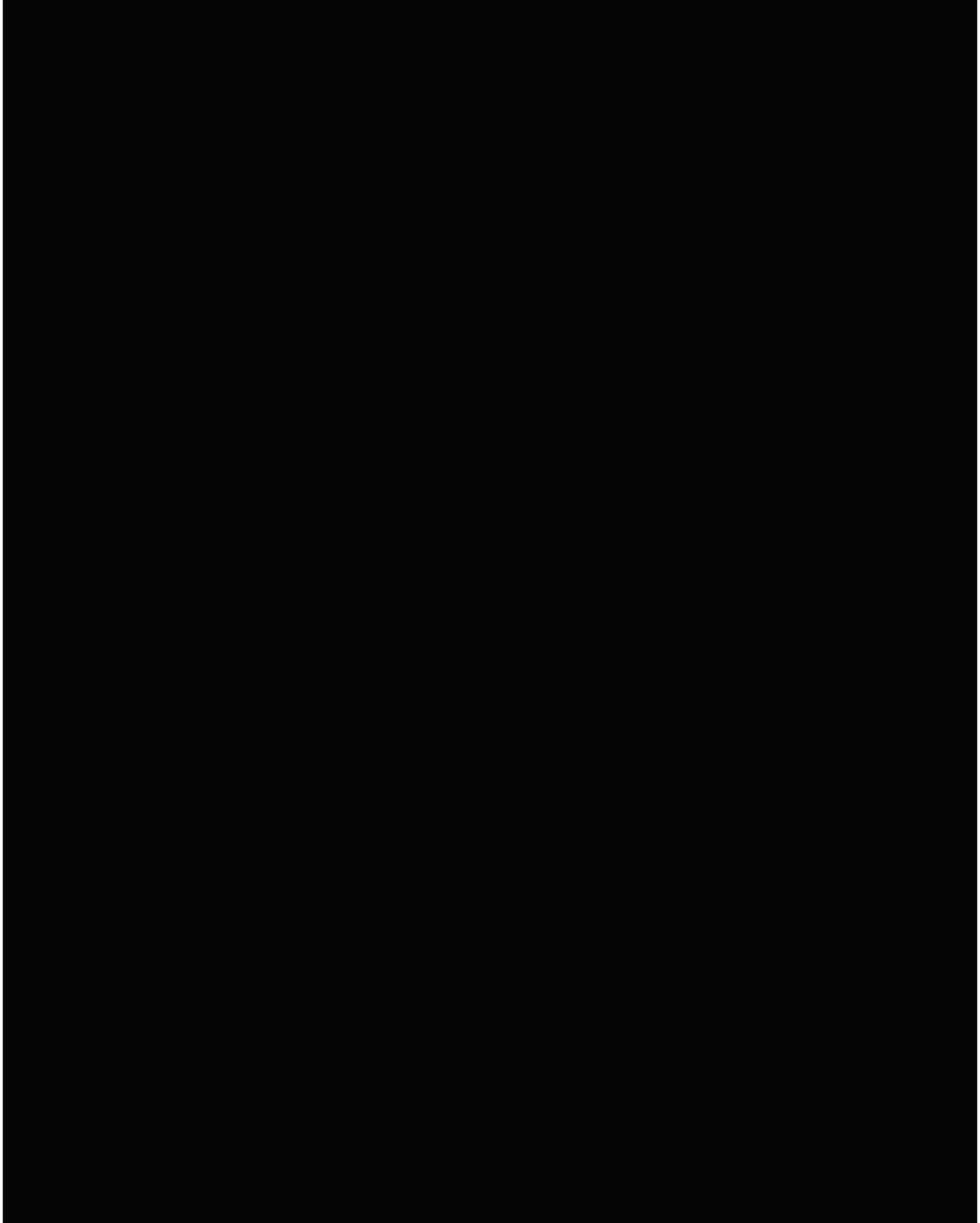
While having a leading offering is important, it does not paint the complete picture of what a quality sports betting product looks like. The in-game wagering experience is one that Kambi has focused on and shows the intricacy of its solution.

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The following exhibits have been redacted in their entirety:

Exhibits A, B and C.

Exhibit D

MOBILE SPORTS WAGERING REVENUE SHARING AGREEMENT

This agreement (“Agreement”) to share certain net revenues to be derived from the licensed operation of mobile sports wagering (“Mobile Sports Wagering”) in the State of New York, under the license, authority, and regulation of the New York State Gaming Commission (“Commission”), shall memorialize the terms and conditions agreed to between Rush Street Interactive, LP (“RSI”), with offices located at 900 N Michigan Ave, Chicago, IL; Empire Resorts, Inc. (a member of the Genting Group), with offices located at 204 State Route 17B, PO Box 5013, Monticello, NY (“ERI”); PointsBet New York LLC with offices located at 1331 17th Street, Suite 900, Denver, CO 80202 (“PB”) and Mohawk Gaming Enterprises, LLC, with offices located at 873 State Route 37, Akwesasne, New York (“MGE”) (with each individually a “Party,” and collectively referred to as the “Parties”).

WHEREFORE, the Parties hereby acknowledge the receipt of good and valuable consideration, the sufficiency of which is adequate, and in exchange the Parties agree as follows:

1. Term of Agreement. This Agreement shall be deemed effective upon the award of a Mobile Sports Wagering license (“MSW License”) to the applicant group consisting of RSI, ERI, and PB (and any other parties thereto) and shall continue in effect for the term of such License, including any renewals thereof.
2. Obligations Under MSW License. Responsibility for the operation of Mobile Sports Wagering under the MSW License shall be borne solely by RSI, ERI and PB, and MGE shall have no duties or obligations pertaining to the operation of Mobile Sports Wagering. MGE agrees that it shall cooperate with RSI, ERI and PB generally and shall use its best efforts to provide information relating to Mobile Sports Wagering and/or this Agreement as requested by the Commission or as otherwise reasonably requested by RSI, ERI and PB. Moreover, MGE is not responsible for the payment of any application costs or fees, license fees, or other payments required under the MSW License.

3.



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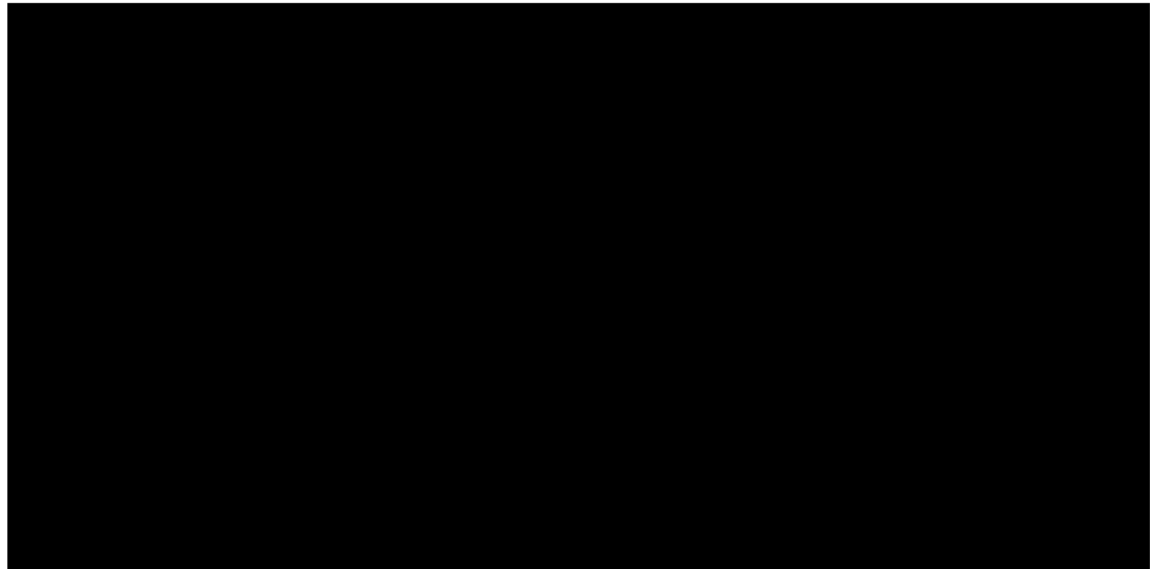
4.



5.



6.



7. Publicity. No Party shall issue a press release or other public marketing and communications materials without the consent of the other Parties, provided that nothing shall restrict any disclosure required by applicable laws, regulations, tribal ordinances or rules (including the rules of any stock exchange).

8. Miscellaneous Provisions.

- a. Each Party represents that it is duly authorized to enter into this Agreement and that it intends to be legally bound by terms contained herein.
- b. Nothing herein contained shall be deemed or construed to create a partnership or joint venture between the Parties hereto.
- c. No Party shall be liable to another for any delay in or failure of performance under this Agreement due to a Force Majeure occurrence. Any such delay in or failure of

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performance shall not constitute a default or give rise to any liability for damages. As herein used, "Force Majeure" means fire, explosion, action of the elements, governmental interference, rationing, pandemic, civil disruption, or any other cause which is beyond the control of the Party affected and which, by the exercise of reasonable diligence, said Party is unable to prevent.

- d. Each Party shall be solely responsible for its own negligence, as well as the negligence of any of its subcontractors, agents, employees, officers, or directors, and for any errors or omissions in performing its duties arising under this Agreement which result in damages to another party. Each Party shall indemnify, defend, and save harmless the other Parties, and their officers, employees, agents, assigns from and against any and all third-party claims, liabilities, losses, damages, costs, or expenses, including reasonable attorneys' fees, which are actually incurred, suffered, or required in whole or in part by an actual or alleged act or omission of such Party, including its subcontractors, agents, employees, officers, or directors.
- e. This Agreement shall be construed in accordance with the Laws of the State of New York.
- f. This Agreement replaces and supplants all prior agreements, verbal or written, between the Parties as pertaining to the matters contained herein. No amendment or modification of this Agreement shall be binding unless made in writing and signed by the Parties hereto.
- g. This Agreement may be executed in separate counterparts, each of which shall be deemed an original, and which together shall constitute one and the same instrument.

WHEREFORE, THE PARTIES HEREBY EXECUTE THIS AGREEMENT AND ACKNOWLEDGE, ACCEPT, AND AGREE TO BE BOUND BY THE TERMS CONTAINED HEREIN:

Rush Street Interactive, LP

By: Richard Schwartz 8/1/2021
DocuSigned by:
Richard Schwartz (date)
 Individual

Empire Resorts, Inc.

By: Kevin C. Jones 08/01/21
DocuSigned by:
Kevin C. Jones (date)
 Chief Strategy & Legal Officer

PointsBet New York LLC

By: _____
 (date)

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performance shall not constitute a default or give rise to any liability for damages. As herein used, "Force Majeure" means fire, explosion, action of the elements, governmental interference, rationing, pandemic, civil disruption, or any other cause which is beyond the control of the Party affected and which, by the exercise of reasonable diligence, said Party is unable to prevent.

- d. Each Party shall be solely responsible for its own negligence, as well as the negligence of any of its subcontractors, agents, employees, officers, or directors, and for any errors or omissions in performing its duties arising under this Agreement which result in damages to another party. Each Party shall indemnify, defend, and save harmless the other Parties, and their officers, employees, agents, assigns from and against any and all third-party claims, liabilities, losses, damages, costs, or expenses, including reasonable attorneys' fees, which are actually incurred, suffered, or required in whole or in part by an actual or alleged act or omission of such Party, including its subcontractors, agents, employees, officers, or directors.
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Rush Street Interactive, LP

By: _____
(date)

Empire Resorts, Inc.

By:  _____ 08/01/21
Kevin C. Jones (date)
Chief Strategy & Legal Officer

PointsBet New York LLC

By:  _____ 8/1/2021
Johnny Aitken (date)
US CEO

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Mohawk Gaming Enterprises, LLC

By: Emily Karpman ¹⁰⁵⁵ 8-1-2021
(date)