

WEEK 37
FRIDAY 16 SEP 2022

IN THIS WEEK'S ISSUE: THE STAR "UNFIT" FOR LICENCE; DRAFTKINGS PARTNERS AMAZON

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THIS WEEK

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AMAZON AND DRAFTKINGS PLAY THURSDAY NIGHT FOOTBALL

STAR ORBITS REGULATORY BLACK HOLE





GET READY FOR THE FOOTBALL WORLD CHAMPIONSHIP

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As The Star Entertainment Group becomes further embroiled in legal and regulatory troubles, following a new report by the NICC, we ask: can it manoeuvre its way through the asteroid field?

This week, The Star Entertainment Group has been served with a show cause notice by the New South Wales Independent Casino Commission (NICC), following an investigation into its suitability to hold a casino licence in Australia.

After the casino operator was accused of multiple allegations of money laundering, organised crime, foreign interference and fraud by an undercover investigation by 60 minutes and The Sydney Morning Herald, the NICC opened its own investigation into the claims.

Shortly before the report, authored by Adam Bell, was due to be published, The Star halted the trading of its shares, saying in a statement: "The Star is yet to receive a copy of the report, which has not been released publicly, and a trading halt is requested pending the public release of the report, which The Star understands will be made on Tuesday 13 September 2022."

That report was revealed on 13 September, and the results were damning for the casino operator. Philip Crawford, NSW Independent Casino Commission Chief Commissioner, said of the findings: "The report is, quite frankly, shocking. It provides evidence of an extensive compliance breakdown in key areas of The Star's business.

"The report is, quite frankly, shocking. It provides evidence of an extensive compliance breakdown in key areas of The Star's business" – Philip Crawford

"Not only were huge amounts of money disguised by the casino as hotel expenses, but vast sums of cash evaded anti-money laundering protocols in numerous situations, most alarmingly through Salon 95 – the secret room with a second cash cage."

Throughout the investigative process and inquiry, the depth of Star's actions was somewhat revealed when several executives resigned from the company; including former CEO Matt Bekier, who said earlier this year during the inquiry: "If the board of directors had known about any of these things, they would have supported me in shutting down that business a long time ago."

Four days after Bekier's testimony, CFO Harry Theodore and NSW Chief Casino Officer Greg Hawkins resigned from the board, along with Chief Legal & Risk Officer and Company Secretary Paula Martin.

The decision now put before the NICC is what kind of punitive action it will take against Star, with the removal of its licence being seriously considered by the regulator.

However, it has an uneven history of punishing casino operators. In March of this year, Crown Resorts was found

unsuitable to run its casino in Perth following an investigation into its practices. But it was given two years by the regulator to return the resort to suitability under the watch of an independent regulator.

The punishment appeared lenient when considering the weight of the criminal findings at the resort, which included money laundering, and a failure to implement a system that detected suspicious transactions.

More than that, going back to October 2021, the Royal Commission found that Crown Resorts was unsuitable to run Crown Melbourne, but allowed the company to retain its licence with stricter oversight.

The report into Crown Melbourne said: "The Royal Commission finds Crown is unsuitable to hold a casino licence on the basis that it has engaged in conduct that is 'illegal, dishonest, unethical and exploitative.' The Royal Commission notes that the scale of the wrongdoing is so widespread and egregious that 'no other finding was open."

Yet, Crown remained.

But the story doesn't end there; Australian Prime Minister, Anthony Albanese, then came out and publicly defended the current regulator, saying: "It's pretty obvious that the state regulators are doing a pretty good job of holding the casino operators to account.

"I'm not in favour of regulation for the sake of it. It's pretty hard for anyone to argue that either Crown or Star are not being held to account at the moment."

GI Verdict: In most instances, the report into The Star's business practices would be enough to force a regulator to remove the licence.

However, there are doubts due to the general unwillingness of Australian regulators to hand down licence removals in the past. This is something Paul Newson highlighted in an exclusive discussion with *Gambling Insider*, saying: "If precedent means anything, loss of The Star's licence seems remote."

The sheer scale of wrongdoings levelled at The Star on this occasion, and Crown in recent times, is a baffling dereliction of duty. But, even with such shocking amounts of wrongdoing riddled throughout The Star, do the operators simply know the removal of their licence is unlikely?

It is perhaps the case that, despite a full investigation and damning evidence being discovered, the casino operators know any action taken will be harsh, without actually removing a licence. Quite why the regulators appear unwilling to remove a licence is guesswork, though it could come down to the fact that both Crown and Star are the two biggest casino operators in Australia. Therefore, removing any licences would have serious financial consequences for the industry in the country in the short term. Whether or not The Star will be made an example of remains to be seen but, judging by recent years, such an outcome is far from certain.

TAKING STOCK

SHARE PRICES COVER THURSDAY 8 SEPTEMBER TO THURSDAY 15 SEPTEMBER (14:30PM GMT)

The Star Entertainment Group 2.63 AUD



Melco Resorts



Red Rock Resorts



Bally's Corporation 24.73 USD



Rush Street Interactive 5.19 USD



Light & Wonder 49.25 USD



PlayAGS 6.53 USD



IGT 17.88 USD



AMAZON AND DRAFTKINGS PLAY THURSDAY NIGHT FOOTBALL

Retail and media juggernaut Amazon has become the latest entertainment provider to team up with a betting brand.

Under a multi-year agreement, Boston -based DraftKings will serve as the primary sponsor of Thursday Night Football, a show on Amazon's streaming platform, Prime Video. Their collaboration kicked off on 15 September, when the Los Angeles Chargers faced the Kansas City Chiefs, and will cover all 15 of Amazon's Thursday night games. DraftKings, meanwhile, will offer TNF-themed content through its sportsbook app.

Stephanie Sherman, DraftKings CMO, commented: "The NFL season is the most active time of year for our customers, so collaborating with one of the world's leading technology brands to offer engaging content to viewers of TNF on Prime Video is a tremendous opportunity for DraftKings.

"Prime Video is an innovator in live content and we both have a similar focus on constantly improving our customers' experiences.

"We look forward to working with Amazon to bring millions of viewers a premium and enhanced experience during TNF on Prime Video all season long and for years to come."

This deal is perhaps indicative of a larger trend: the convergence of media and sports betting, especially in the US. For example, Amazon's streaming rival – Disney – recently reaffirmed its commitment to ESPN and sports betting more broadly.

During Disney's D23 fan event, CEO Bob Chapek downplayed any plans to spin off ESPN and, when asked whether it was developing an ESPN sports betting app, said the company is "working very hard."

While this constitutes a reasonably clear signal of Disney's intent to invest in sports betting, Amazon's latest move may also indicate an interest in getting in on the action.

The company seems open to gambling more and more, having last month signed a deal with Directy to showcase TNF coverage at casinos, among other locations.

And earlier this year, the company's subsidiary, Amazon Web Services, joined forces with Maple Leaf Sports & Entertainment to "transform" the sports experience for Canadian fans.

Regarding its latest partnership, Danielle Carney, Head of NFL Sales, Amazon Ads, said: "We are thrilled to collaborate with DraftKings to bring fans more insights and excitement as part of the TNF viewing experience.

"DraftKings content will contribute to lively pre-game discussions, fan engagement and, perhaps, some bold predictions from our on-air talent."

GI Verdict: The convergence of media and sports betting continues. In the realm of streaming, content is king as platforms vie for viewers' attention. Audiences demand more options to engage and wagering is currently popular in the US. It makes sense, then, for big streaming brands such as Amazon to capitalise on this. While the company has yet to bring betting directly to Prime Video, this latest partnership could be a sign of things to come. And the big question is: will the giant ever get directly involved in sports betting by itself?





BRITISH RACING WILL NOT GO AHEAD ON DAY OF QUEEN'S FUNERAL

The British Horseracing Authority (BHA) has announced that all British racing will be suspended on the day of Her Majesty the Queen's funeral.

On what will be a national bank holiday, 19 September 2022 will mark a day of respect for Her Majesty, in which all sporting events will be postponed.

British horseracing was the only major sport scheduled for the day, but all races have now been cancelled as a mark of respect.

The BHA says the cancellations will give everyone involved in British racing the opportunity to mourn the passing of Her Majesty, and offer thanks for her contribution to the sport and the nation.

Further information on rearranged races will be shared with participants, racecourses and racegoers in the coming days, said the BHA.

Racing will, though, continue to take place throughout the remainder of the intervening period until the Queen's funeral takes place.



All races were recommenced after postponements and cancellations on the weekend following Her Majesty's death on Thursday 8 September.

Horseracing was not the only sport to announce postponements. The Premier League announced that weekend fixtures from 10 September to 12 September would not go ahead as a mark of respect

to the Queen, who passed away less than 48 hours before fixtures were scheduled to take place.

Major retailers also shut their doors, including William Hill and Betfred. In separate statements, the operators expressed their sadness, announcing closures on the evening of Thursday 8 September, and the day of Friday 9 September as a mark of respect for the passing of Her Majesty the Queen.

GI Verdict: The Queen's passing has evidently been a sad event for many people in and out of the UK, with horseracing unsurprisingly taking a pause on the day of the funeral given her close connections with the sport.

It does, however, remain up in the air whether other sports could have indeed marked her passing with a minute's silence or a special tribute, rather than cancelling fixtures altogether and bringing competitions such as the Premier League to a standstill, thus affecting millions of fans across the globe.













AN EXECUTIVE IS PROMOTED: KONAMI TAKES A PUNT ON PUNTER

Konami Australia has expanded David Punter's role to include the Asia region within his duties.

Punter – brilliantly named for this industry – is now Konami's Operations Manager Sales, Marketing and Service ANZ/APAC. This means the executive will cover the Asia Pacific area on top of his existing responsibilities within the Australian region.

Punter has over two decades of experience in sales, marketing and product strategy; his new role will focus on customer requirements, as well as driving sales and product strategies.

Before his time at Konami, Punter held roles at Aristocrat and Scientific Games (now Light & Wonder), ensuring his CV boasts some of the biggest names in B2B gaming. Prior to those roles, Punter was Manager of the Prince of Wales Hotel between 1994 and 2000.

Steve Sutherland, Konami Australia MD, and President & CEO of Konami Group's Gaming & Systems division, said: "David has been in senior roles

KONAMI

in the gaming industry for nearly two decades, with a passion for sales, marketing products and meeting customer gaming requirements.

"This has been reflected in his time with Konami for nearly five years, driving sales and customer results across the domestic markets in ANZ.

"With David's expanded leadership across Asia and passion for effective market delivery, his expanded role will drive even further momentum across ANZ and APAC."

At the end of August, Konami announced another senior appointment, with Gerard Grosby becoming the supplier's new SVP & Chief Games Product Offer.

Earlier that month, Konami released its Q2 report, with its Gaming & Systems segment generating ¥7.7bn (\$57.3m) in revenue, a year-on-year increase of 22%.

GI Verdict: Punter certainly has strong experience in the industry, and he will be using all of it in his expanded role, with Konami relying on his sales and marketing know-how to help bolster the company's presence in Asia.

With senior appointments and year-on-year revenue increases, it's a promising time for Konami, with Punter likely to continue this success into the Asia Pacific area.





THIS WEEK IN **NUMBERS**

\$100m



Total pay rise for half of Hard Rock International US workforce

€203.9m (\$207.3m)

GGR for Spain for Q2 2022



1s

Active NFL Athlete Brand Ambassador for MGM Resorts International; Las Vegas Raiders All-Pro Wide Receiver Davante Adams

PARIPLAY GAINS APPROVAL FROM PANAMA GAMING CONTROL BOARD

NeoGames subsidiary Pariplay has gained approval to supply its services in Panama.

The group is now a registered supplier with Panama's Gaming Control Board, allowing it to offer its Fusion aggregation platform to locally licensed operators.

The approval further boosts the company's presence in LatAm, with Pariplay having been approved as a registered supplier for Buenos Aires City, Argentina, earlier this month. The registration was granted by the Government of the City of Buenos Aires (LOTBA).

"The Latin American region is quickly growing, offering lucrative opportunities for Pariplay to introduce our products and content to new markets," said Pariplay Managing Director Adrian Bailey.

"We see LatAm, including Panama, as a key focus for us going forward and are certain that our top-performing slots library and ample verticals offering will resonate well with local players."

The approval to operate in the City of Buenos Aires follows similar moves from the NeoGames subsidiary in both Mexico and Colombia, with Panama now the latest country the group has targeted.

Pariplay's library of games hosted on its Fusion aggregation platform comprises 14,000 titles from over 80 providers.

Jorge L Morales, Director for Latin America and the Caribbean at Pariplay, commented: "This approval to operate in Panama is the latest in a string of regulatory green lights that have seen us significantly expand our presence in LatAm.

"It is an exciting time for us as we have ambitious plans for Panama, and I look forward to working together with local operators to offer our games to their customers."

GI Verdict: It's evident that Pariplay views LatAm as a key region going forward, with the Panama approval hot on the heels of the Buenos Aires approval, and both of these regions adding to the company's presence in Mexico and Colombia.

Just like LatAm, the group's Fusion aggregation platform is growing, and it looks likely other South American countries will follow in the near future.





120

Matches in the European Cricket Championships 2022, where Stake.com will serve as an official partner

2023

Release for Assassin's Creed Mirage, which developer Ubisoft confirmed will not feature real gambling or loot boxes



€700m



Price tag for IGT's sale of its Italian commercial payment business to PostePay (\$699.4m)

KINDRED GROUP PRESENTS NEW FINANCIAL TARGETS FOR 2025

In connection with Capital Markets Day, Kindred Group will present new financial targets for 2025, including revenue of above £1.6bn (\$1.84bn).

Other financial targets include an underlying EBITDA margin of 21-22%, and a distribution policy of approximately 75-100% of free cash flow, after M&A.

Kindred will host a Capital Markets Day in London later today, where CEO Henrik Tjärnström and members of the management team will present the company's long-term strategic direction and priorities for the coming years.

Priorities include gaining further market share by "being a trusted source of entertainment" in the group's existing core markets in Europe and Australia, which are expected to grow with a CAGR of 7% between 2021 and 2026, as well as developing a strong position in the Netherlands.

Kindred also plans to leverage strategic investments such as the Relax Gaming acquisition and the development of the Kindred Sportsbook Platform, while also building on the foundation established in North America.

"I am delighted to share a more detailed view of our strategic direction and priorities we have set out at Kindred," said Tjärnström.

"The entry into the Netherlands has also exceeded our expectations and we are well underway to reach our ambition of a 15% market share by the end of the year."

GI Verdict: Kindred is currently juggling several different items, with the company navigating through various regulations in the many different markets and verticals it is operating in.

But given the latest targets, the group is seemingly managing its assets expertly, with its North American plans just getting started.

The update from Kindred follows the group's second quarter report in July, when the company reported £238.7m in total revenue, a 34% decline from the prior-year period. It remains to be seen whether the publishing of these new targets is an astute move from the company, or whether it is just an admission that Kindred slightly miscalculated and recent months haven't gone as well as planned.



THE WEEK IN QUOTES

"Our strategy is to continuously expand our product offering and provide our customers with fresh content that is consistent with our brand. With a strong foundation in esports betting and a growing traditional sports business, offering casino in an authentically Rivalry way is the next step for us."

Rivalry Co-Founder and CEO Steven Salz on the group's expansion into the casino segment

"We are ecstatic to partner with the New England Patriots, one of the most successful and legendary franchises in the NFL. We look forward to bringing our NFL-themed slot games to casinos across Massachusetts, providing an opportunity for passionate Patriots fans to experience their favourite team in new and exciting ways."

Aristocrat Gaming CEO Hector Fernandez commenting on the supplier's multi-year partnership with the New England Patriots

SCIENTIFIC GAMES AND TEXAS CONTINUE LOTTERY PARTNERSHIP

This week, Scientific Games revealed it has extended its long-running partnership with the Texas Lottery to continue providing scratch ticket games and custom promotions in the state.

The new agreement is valid until 2034 and means the relationship between the pair will reach the 42-year mark – having started in 1992, when the state's lottery began.

As part of the latest deal, Scientific Games will provide its new SCiQ system, which it claims is a 'ground-breaking lottery retail technology ecosystem that improves in-store display and security for scratch tickets, and offers retailers inventory, marketing, accounting and operational efficiencies.'

On the deal's announcement, Gary Grief, Executive Director of the Texas Lottery, said: "Scientific Games' products and promotions played an important role in the Texas Lottery achieving more than \$6.73bn in scratch ticket sales for fiscal year 2022."

Meanwhile, John Schulz, President Americas & Global Instant Products for Scientific Games, also commented: "Scientific Games applauds the Texas Lottery for its ongoing vision in the retail and player entertainment experience, and in advancing the lottery retail environment."

GI Verdict: Seeing an extension to such a long-running partnership is hardly a surprise, as clearly both parties feel the mantra if it isn't broke, don't fix it' applies to the way the Texas Lottery is run.

Since 1992, the parties have raised over \$35bn for good causes, an enviable track record for any state lottery in the US, and a soundbite that those which sanction such agreements will adore. A fact that only strengthens the relationship between the state and Scientific Games.



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"I could not be more thrilled to partner with M88 Mansion, with a special focus on sports. M88 Mansion has always amplified international sports events and our partnership will surely take its approach to even greater heights. Our collaboration will offer huge promotions and much more."

Boxing legend Manny 'PacMan' Pacquiao on becoming an M88 Mansion Ambassador

"We're effectively blurring the lines between the worlds of iGaming and film, particularly now with these celebrity titles. Apart from yielding an all-round better experience for players, it opens up the door to some fantastic new game concepts."

Real Dealer Studios Chief Product Officer Shane Cotter upon the launch of the company's cinematic RNG casino games starring Vinnie Jones

FANATICS, MEET JASON WHITE

Fanatics has confirmed that Jason White will be the new CMO of its sports betting brand, Fanatics Betting and Gaming.

After finding success in similar roles with MTV and Beats, White now takes up his new role with the clear remit to grow the business in the betting and gaming industry.

At the announcement of White's appointment, CEO of Fanatics Betting and Gaming, Matt King, said of White: "Jason has a proven track record of helping to build globally recognised brands who are disruptors in their categories, and we're thrilled to have him join Fanatics Betting and Gaming as we ramp up to our official launch.

"As this competitive space continues to evolve, Jason will be invaluable to our long-term strategy of creating a dynamic and innovative product offering for all sports fans."

Meanwhile, White, speaking of his position, added: "I've spent a large part of my career working at moments of cultural disruption, from Beijing 2008 to

the legalisation of cannabis and the rise of Beats by Dre, and I believe legal sports betting is the next cultural touchpoint that is ripe for transformation."

The Fanatics Betting and Gaming brand is not up and running yet, though it filed a trademark application earlier this year in Maryland, which was approved. However, New York denied the application, with Fanatics now having to resubmit the proposal.

GI Verdict: Though there are clear teething problems with the new brand, evident with the trademark rejection in New York, Fanatics clearly feels it will be a strong new addition it its business.

The appointment of Jason White only compounds this belief, as he brings experience and confidence to a competitive sports betting market.

Big things are expected from Fanatics, with several industry commentators tipping the brand to be a big player when it lines all its ducks in a row.





REVENUE REPORTS: FLORIDA JULY, KANSAS AUGUST

Fantini Research partners with Gambling Insider to provide weekly gaming industry data. This week, we look at July sports betting revenue from Florida's tribal locations and land-based casino revenue from August in Kansas.

Aside from marginal improvements at two locations - Miami Jai Alai and Hialeah Park – sports betting revenue in Florida was down for July. It may be seen as a positive, however, that revenue losses for July were only slight; the Dania Jai Alai posting the biggest drop in revenue of 9%. This is the off-season of many US sports leagues (aside from Major League Baseball), so operators have done well to keep revenue decreases to a minimum.

Elsewhere, casino revenue from landbased locations in Kansas has shown mixed results for August. The state only recently launched sports betting on 1 September.

FLORIDA- JULY REVENUE			
SPORTS BETTING REVENUE	JULY REVENUE (M)	CHANGE (%) MONTH-ON-MONTH	
Miami Jai Alai	\$8.749	+1.51	
Hialeah Park	\$8.745	+0.49	
Magic City Flagler	\$10.635	-0.11	
Calder (CHDN)	\$8.651	-1.11	
Big Easy	\$3.488	-1.41	
Gulfstream	\$4.348	-2.28	
Pompano (CZR)	\$9.544	-6.93	
Dania Jai Alai	\$3.825	-8.97	
Total	\$57.985	-1.98	

KANSAS- AUGUST REVENUE			
TOTAL GAMING REVENUE	AUGUST REVENUE (M)	CHANGE (%) YEAR-ON-YEAR	
Hollywood Casino (PENN/ISCA)	\$12.409	+7.07	
Kansas Crossing	\$3.382	+4.24	
Boot Hill Casino (BUKS)	\$4.076	-1.74	
Kansas Star (BYD)	\$12.758	-6.33	
Total	\$32.625	+0.07	



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What is Neosurf's approach to the customer experience and what does it mean to you personally?

It's a passion of mine; I go on and on about it. But I never used to go on about it years before when I worked at Ukash, although it was important. I learned about it when I worked with lending company Wonga and learned from a user experience expert there.

What I learned is if you want to serve your customer well, then let them be able to do what they want to get the best experience personally. In our instance, it's depositing money into our operators, or loading/withdrawing the money. So our user experience is absolutely at the heart of what we do, we have a passion for it. You never ever take the user experience for granted. You can't say: "Right, let's review it next year;" you've got to constantly review it.

The customer experience from a Neosurf point of view is, at the end of the day, about conversion for our operators and the players. But it starts with asking: "Can I get a voucher? Can I get one online? Can I get one in a shop? What can I get if I'm a cash customer?" Or, customers may just want some privacy.

Some may ask: "Do I have to pay a premium for a voucher?" Not in the shops you don't. But, sadly some of our online retailers insist on doing it. I personally hate it; I don't like it and they know that. I don't think we should be charging the players. But access is absolutely at the forefront of what we do, just like it is for our competitors. We're all making sure

"You never ever take the user experience for granted. You can't say: 'Right, let's review it next year;' you've got to constantly review it"

we're in the latest shops, local shops, etc. Then once you've got your value as a player, how do you deposit that? Here, the operator has to be so, so swift. There are so many things in the background you can do. But the things you do here do not have to be arduous in my personal view. You have to include terms and conditions, of course, privacy policy, etc. Again, I'm a personal hater of all the different ways in which a player has to confirm it is them who is playing. It creates a process with all these multiple clunky pieces. My hope is companies and regulators can get together and make that more simplistic. For us, we are all about the least amount of effort to maintain the easiest way for you to pay legally. That's what it's all about.

Are there any other reasons why customer experience matters so much to you?

I'm a retailer; I grew up in retail. At the age of 12, I worked with my parents who had a greengrocer and florist shop. I was introduced to serving customers. The way I learned that you would earn your money is by treating customers fairly, with a smile. That is the core of giving a good customer experience; it's what is expected in any kind of service industry.

Neosurf has a customer experience pledge for the players, through our clients the operators. So we do have a direct relationship with these players because we're a payment mechanism; we're a payment processing or vouchers and prepaid company. We are also an e-money space; a local alternative payment method. But at the end of the day,



that player is going to go and spend their money – that they've used Neosurf for – with one of our clients. This is the heart of it. We have a conversions report that comes out every morning. And at six o'clock every morning, I look at that conversions report. I have a business analyst team that's analysing it. And I'm spotting if anything's gone wrong or if anything's improving. I also check to see if something looks a bit odd, which could reveal any fraudulent activity.

"The operator matters to us as much as the player, and making sure we can help and share data is very important"

The point is: the customer experience has to be something smart. With our developers, we designed something that doesn't look like other payment companies. I disliked this in the beginning because I thought it looked a bit too simplistic. But it was an important step that proved to be successful for our conversions. This isn't technical conversions, some of our competitors go on about getting conversions of 98.99%. No, they're not. That's their technical production of the payment. We should all be doing that by default in the industry. I'm talking about somebody choosing Neosurf off the cashier pay and executing and completing the deposit. Now, players are using our wallet, so the question is: do we keep offering vouchers? Because regulations would penalise players for that. There's a whole lot of stuff going on in the background. But if you've got an account and you've got the value in that account, it's less than five seconds to deposit. That's why we're getting seriously high 70% and 80% conversions.

How would you say your approach to customers differs from your competitors?

I'll get shut down for this, but I'll go ahead and say it: our app isn't the best in the world. It's not as fancy and as clean as it could be, and we're in further developments now. The actual process of depositing is clean and swift. But when you are on the operator's cashier page, at the point at which you need to make that transaction happen, I believe most of us in the payments world are pretty bad. I believe Neosurf is very good here. I don't believe we're brilliant and to the point of perfection, and if we were at perfection, I'd be bored and give up. Some payment providers are better than others; some care more than others.

There are some companies in our particular area who, the bigger the company is, the less they care about how their solution works. I'm fed up with adverts that keep showing

B2B marketing applications to operators. The app is supposed to be a customer environment. By all means, have a good app and make sure it's beautiful for the player, absolutely. But on the B2B side and with your client and the operator, make sure it works. Make sure it's accurate. Make sure it's the best experience and that you convert it. And whatever you've done, make sure it's meeting all the regulatory needs, and make sure you have responsibility and accountability as a payment provider. Support your clients. I do get on my pedestal about this.

It's interesting to hear you say you're on your pedestal!

Neosurf is a small, small part of this world really, because we were very unique. There are a number of our competitors who say cash is not so big anymore, which is not true as there's more cash in circulation than there ever was. Cash is still important; privacy is still important. Everybody should be treated fairly and everybody should be treated properly. You should be able to get the regulatory items done behind the scenes... I'm on my pedestal again! But it is important and it worries me that there is a level of flippancy from payment providers when it comes to the customer experience. For us, the player chooses Neosurf. It is a redirect which everybody hated the idea of in the beginning, but it's all been proven that it actually increases the conversion.

There is a very good discussion we have internally, and that's the balance between this customer experience positioning and the cost when it comes to regulatory requirements. We came out with something called a KYC handshake. We're very, very lucky to have some serious operators who are willing to work with us on that. Only if there's a problem do we stop the customer; we do not put barriers up for them straight away.

There are levels in the payment world. I believe we must all take our responsibility to the customer seriously. We're all in the same game; let's not judge each other. Let's work with each other and share knowledge. It does annoy me when one provider thinks they're on one level and another company is on a lower level.

What's the plan for Neosurf going forward?

The first thing is you need to constantly look at what is happening in your conversions and the reactions from your customers. You've got to look at everything, so you need to have people analysing it. We've invested heavily in data analysis and Al. We have some fabulous people in my team who deal with that.

We're constantly looking into how we improve it with different markets, new regulations and assisted regulations, etc. We'll be taking our own accountability and being part of that process with the operator. We will treat our customers, the operators' players, with respect. Also, the operator matters to us as much as the player, and making sure we can help and share data is very important – and it's a part of that relationship.



CARVING OUT A NICHE

Any gambling company – given the crowded nature of the market – faces an age-old question: 'How do we stand out?' In the B2C operator space, there are only a finite number of ways to do so. And, when brands reach a certain size, direct advertising to consumers on a wider scale becomes inevitable.

Again, the issue centres around 'how.' How does a company stand out with an advertising campaign, be it on television, billboards or social media?

Famously, Paddy Power is provocative and tongue in cheek – its Rhodri Giggs advert of 2019 is, in *Gambling Insider's* opinion, the finest gambling advert of all time. Others are arguably more boring, but certainly more straightforward. The likes of William Hill and Coral, for example, are household

names so don't need to say much. In the US, BetMGM has gone big with brand ambassadors like Jamie Foxx, while Caesars this week sent a sports betting and casino truck out on a nationwide tour (emblazoned with the words 'oh hail, yes')'. Yet, if you are not a tier-one brand name, what do you do? Smarkets recently took a different approach – and arguably set a trend. The sports betting operator's advert was not approved for TV, instead being accessible via a QR code on posters plastered around the London Underground.

This week, PointsBet followed a similar path, with an advert not quite appropriate enough for TV but, instead, launched on YouTube and the operator's social media accounts. Not only is this more targeted advertising (something we will explore in our upcoming *Malta Focus* magazine), it's a clear sign that up-and-coming operators are trying to carve out a niche, with precisely the aim of standing out versus tier-one brands.

Will it work and ultimately increase market share? Or are these operators better off following more traditional routes, perhaps simply outbidding bigger rivals for the most famous names? One thing we can commend both Smarkets and PointsBet for: their adverts are certainly more creative than Ladbrokes' silly Rocky commercial. What's that all about?

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