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WEEK 38

FRIDAY 23 SEP 2022

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AWARDED UK NATIONAL LOTTERY LICENCE



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DRIVING DIFFERENTIATION



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THIS WEEK

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GUEST COLUMN

Adam Doyle,
Head of Gaming,
RiskNarrative



EXCLUSIVE Q&A: GAMING REALMS CFO ON ONTARIO, MICHIGAN AND MORE

UK LOTTERY LICENCE: THEY THINK IT'S ALL-OVER

allwyn



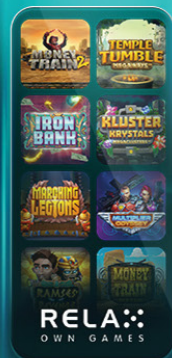
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Mark Segal, Gaming Realms CFO, joins *Gambling Insider* for an exclusive interview on the supplier's H1 results, licensing and North American markets

What's your overall impression of Gaming Realms' interim H1 results?

We're really happy with it. We've seen growth, it's what we said we were going to be doing. We're starting to see healthy growth in all the US markets we're in. We know the potential's there for more growth, as we get more games certified and go live with more operators. And we're still growing in the maturer European markets.

Can you talk me through the ins and outs of the content licensing figures that were reported?

Licensing overall grew from 5.8% to 6.7%. We have two revenue streams within licensing. One is our 'day job' – our core focus – we're a games studio, we license our content. That's the one that's had impressive 57% growth. The brand licensing – Slingo is an interesting IP; it's become a game category. If you go to lots of the partner sites we've got in the UK, you can see there are slingo tabs – and it's now a category in itself. What that means is we are looking at how we can take Slingo into adjacent markets; we have a deal with Zynga, and we've also licensed Slingo to Scientific Games for lotteries – you can buy scratchcards in over 40 states. The renewal of that was the more significant deal we had last year. Brand licensing is lumpy – it was a four-year deal but because of accounting standards, we had to report that all up front. We've had some really great progress overall.

“The Ontario market has started to grow, not where we'd like it to be, but we can see the same potential as Michigan”

We assume the long-term plan is for North America to keep forming the basis of your revenue. But how does the influx of new suppliers and increasing competition affect this strategy?

There are two things there – one is we'll help some but not all. We're helping 4ThePlayer distribute content, they have a studio and we're going to help distribute for another studio next year. But we're a boutique aggregator – we want to have complementary partners we can work well with. The other side with the US is: it's fine to come into the market, but it's not easy to have your direct integrations, because the operators are so busy doing what they're doing.

We've seen several studios go in without the content and haven't made a lot of progress yet. But we believe Slingo stands out and provides some great games for the US market. We've built bespoke reskins, for example for

BetMGM with the New York Jets and the Detroit Tigers. Slingo's already a brand in the US; it was invented in New Jersey. We're still on around 3.5% market share in New Jersey, we've gone back a little at the moment but we're well placed as it is.

Which states in particular do you see providing the highest level of growth – and what have you made of the Ontario market so far?

Michigan and Pennsylvania are similar-sized markets to New Jersey but our market shares are a lot lower. There's a much more convoluted way of certifying games there – it just takes longer. But I'm seeing results that make me think we'll get to the same level of revenue in those states. Connecticut, we'll go into soon, with two big operators there. It's the same operators across different markets, with different market shares, give or take. New markets – unfortunately there's nothing in terms of legislation at the moment. But we have a pipeline that shows there's growth – and we've still had four of five quarters – post-Covid – of consecutive growth in New Jersey.

Ontario's been an interesting one. It's smaller than I would have thought so far, albeit it's only just launched. They've had a staggered amount of operators who went live immediately – and they've been competing with the grey market. The regulator always said it would take 3-6 months before getting on top of this. And, after three months, there was the odd phone call to suppliers telling them to stop supplying grey-market operators – which we at Gaming Realms don't. It means they've started phoning some of the operators and saying, if you apply for the licence, you'd better stop in the grey market. So the regulated market has now started to grow, not where we'd like it to be, but I still believe we can see exactly the same potential as Michigan.


What kind of figures is Gaming Realms aiming for over the next five years?


I'd love to still have these numbers – I'm sure it will drop percentage wise. We may still see the same values of increase but, of course, it's over a bigger number each time. We're still not quite there in the UK. We're not live with a few big tier-one operators – and some like PokerStars we've literally just gone live with. We haven't got our platform features fully in the market, we haven't got our jackpot games, so there's a few things we can add around it.


There is the potential, as well, with the distribution of building other types of games. At the moment, Slingo does what it needs to do but we want to start adding Slingo slot games and other products, to try and keep that growth up. There's a lot of growth to go in Spain and Italy but they don't affect the global impact too much. The games are built, so it's a matter of getting them into as many places as possible.


TAKING STOCK


SHARE PRICES COVER THURSDAY
15 SEPTEMBER TO THURSDAY 22
SEPTEMBER (10:30AM GMT)


IGT
16.60 USD  7%

Tabcorp
0.98 AUD  4%


MGM Resorts
32.78 USD  5%

Playtech
452.28 GBp  1%

Bragg Gaming
6.43 CAD  12%

DraftKings
16.72 USD  13%

Elys Game Technology
0.45 USD  21%

Ebet
1.48 USD  22%

UK LOTTERY LICENCE: THEY THINK IT'S ALL-OVER

Allwyn has finally been formally awarded the Fourth Licence to operate the UK National Lottery.

The licence, which will become operational in February 2024, is scheduled to run for a decade following Allwyn's takeover.

The process has been marred by legal challenges and court battles, instigated by the current – soon to be former – operator, Camelot.

When Allwyn was announced as the preferred bidder for the Fourth Licence, of which the previous three were held by Camelot, the current operator and its technology partner, IGT, launched legal action against Allwyn and the Gambling Commission in an effort to wrestle control of the UK lottery back for themselves.

However, after Camelot and IGT withdrew their legal challenges earlier this month, the path for Allwyn to begin taking over the licence was cleared – though Camelot and IGT are still seeking over £600m (\$685m) in damages from the Gambling Commission.

After the confirmation of the award, Allwyn Chairman Justin King said: "The award formally marks a fresh start for the National Lottery. We have exciting plans for this important and cherished institution, crucially raising even more proceeds for good causes across the country, improving the player experience through the latest technology and ensuring safe participation."

Meanwhile, Allwyn CEO David Craven added: "This moment signals a time for change for the National Lottery. We have already begun this exciting new chapter;

our transformation programme has started with energy and purpose from our Watford-based headquarters.

"We must seize this moment, creating the right conditions for the National Lottery to innovate."

Andrew Rhodes, Gambling Commission CEO, commented: "We are pleased to have officially awarded the Fourth Licence to Allwyn following a highly successful competition and the court's decision to lift the suspension on the award process. We now look forward to working with all parties to ensure a smooth and efficient handover."

Allwyn has had to be patient for the awarding of the licence, with a major delay in July coming as a huge disappointment to King, when the High Court lifted an automatic suspension that prevented the GC from formally awarding the licence to Allwyn.

But Allwyn's frustrations were alleviated earlier this month when Camelot withdrew its legal challenge, with the former waiving any costs incurred by the latter during the legal process by also dropping its counterclaim.

GI Verdict: It's been a long story full of twists and turns, but all parties will now surely rest easy after the official awarding of the licence. But with an estimated worth of £6.4bn over 10 years, it's no wonder there was such a fight to gain control of it.

Allwyn can now focus on its lottery journey once and for all, and will be keen to put the unwanted attention surrounding the legal challenges and court battles behind it by operating a successful National Lottery.

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PHILIPPINES SENATOR FILES BILL TO PROHIBIT AND PENALISE ONLINE GAMBLING

The Philippines' Senate Majority Leader Joel Villanueva has filed a bill seeking to ban online gambling in the country.

Per Villanueva's request, online gaming activities such as e-sabong (online cockfighting) and offshore gambling will be banned and penalised should people be caught either organising or participating in such activities online.

The bill, titled the Anti-Online Gambling Act or Senate Bill 1281, has been introduced to counter what Villanueva claims are the "severe" consequences of gambling.

Villanueva cited examples of the so-called dangers of gambling, including the case of a 19-year-old student in Davao de Oro who was arrested for being unable to pay P500,000 (\$8,681) in bet money. The young man lost the money while gambling on e-sabong.

Villanueva said: "The bill seeks to prohibit online gambling and the placing of wagers or bets through the internet or any form of online gambling activities to



prevent further deterioration of morals and values, encourage people to work instead of relying on a game of chance, stop addiction and save lives.

"These circumstances also show that the social cost of gambling is too high - bankruptcy, broken families and criminal activities, [occur as a result]."

GI Verdict: This move from Senate Majority Leader Joel Villanueva will

come as a threat to the Philippines' thriving e-sabong industry. E-sabong, and other forms of online gambling, are regulated by the Philippine Amusement and Gaming Corporation (PAGCOR). It wasn't long ago, towards the backend of the global pandemic, that Philippine politicians called for the continuation of iGaming as a means to grow the country's economy following months of lockdown restrictions.

However, with the country's land-based sector now in a period of post-pandemic growth, the spotlight has once again fallen on the legal status of online gambling in the Philippines, which has been highlighted by some for its potentially detrimental social impacts. One would assume a regulatory to-and-fro will now ensue, with politicians taking stances on either side of the iGaming fence. After the Kazuo Okada drama at the Okada Manila, it would seem PAGCOR is in for more legal involvement, while undergoing structural changes itself.



STEPHEN A. CRYSTAL

Founder and CEO, SCCG Management

Email stephen.crystal@sccgmanagement.com
Mobile / WhatsApp +1 (702) 427-9354

On the Web at sccgmanagement.com
igaminglaw.online
stephencrystal.esq.com

On LinkedIn at [linkedin.com/company/sccg-management](https://www.linkedin.com/company/sccg-management)
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SCCG Management is a consultancy that specializes in sports betting, iGaming, sports marketing, affiliate marketing, technology, intellectual property protection, product commercialization, esports, capital formation, M&A, joint ventures, casino management, and governmental and legal affairs for the casino and iGaming industry.



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JAMIE SHEA IS STRIVE GAMING'S NEW CMO

Strive Gaming has appointed Jamie Shea as its new Chief Marketing Officer.

Shea previously held the role of VP of Sportsbook Operation and VIP Marketing at DraftKings, and played a critical role in the operator's growth following the overturning of PASPA (Professional and Amateur Sports Protection Act).

DraftKings is now the industry's seventh-biggest company according to market capitalisation.

Shea's new role will make her responsible for managing all B2B marketing activities at Strive, and all internal and external communication practices; she will also be leading the Managed Services function.

Shea will be working between Las Vegas, Nevada and Vancouver, Canada. Strive Gaming is the first platform business that was specifically set up to meet the multi-state requirements of gambling operators across North America.

Max Meltzer, Strive Gaming CEO, said: "Appointing Jamie to our C-level is another milestone moment for Strive



Gaming, as we build on our reputation for being the number one B2B player platform in North America.

"Jamie's extensive experience at DraftKings and unparalleled knowledge

working for casino operators such as Caesars means very few people have the same combined deep level of knowledge of acquisition, retention, cross-sell across different channels as it relates to physical on-premise and digital sportsbook and casino players throughout the US.

"Jamie understands platforms, technology and people and is a joy to work with which is why we all look forward to working with Jamie."

GI Verdict: Shea's appointment is a sign that female representation at senior levels in the industry is continuing to head one way – up. Coming from DraftKings, Shea's career is one marked with experience, and her latest move is a serious sign of intent. DraftKings is one of the biggest firms in the industry, so moving to Strive Gaming – a far smaller company – marks a bold statement from Shea. The CMO, no doubt, will bring a wealth of experience from DraftKings, and she obviously feels she can make a notable difference at a company looking to climb the growth ladder.

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THIS WEEK IN NUMBERS

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US state in which Kambi is present through a sportsbook agreement with ilani in Washington

£408,915 (\$463,654)

Penalty for Betway for marketing on the children's pages of West Ham United Football Club's website



2



New retail sportsbooks in Seattle for DraftKings; Tulalip Resort Casino and Quil Ceda Creek Casino

IGT SIGNS 15-YEAR CONTRACT WITH ONTARIO LOTTERY AND GAMING CORPORATION

International Game Technology (IGT) subsidiary IGT Global Solutions Corporation has been chosen by the Ontario Lottery and Gaming Corporation (OLG) as the primary technology provider of self-serve lottery terminals.

The contract will run until June 2027 and includes 10 additional one-year contract extension options. Subject to further government approvals, terminals will begin to be installed in retail locations in the second half of 2023.

The agreement marks the first time that self-serve technology is expected to be available to lottery players in the Canadian province of Ontario.

"As OLG embarks on the next evolution of lottery play in Ontario, we will work with key partners like IGT to deliver responsible, secure and convenient access to player-favourite lottery games," said OLG President and CEO Duncan Hannay.

Through the deal, IGT will provide OLG with 1,400 GameTouch 28 self-

serve lottery terminals for deployment at lottery retailers across Ontario, along with its OpenRetail terminal software application, ShowMaker multimedia content creation and management system, and retailer advisory services.

IGT Chief Operating Officer, Global Lottery Jay Gendron commented: "IGT is excited to partner with OLG to responsibly enhance the player experience in Ontario with the debut of our self-serve lottery terminals."

GI Verdict: IGT will have been hugely disappointed to lose out to Allwyn in the race for the UK National Lottery licence, but long-term deals like this will not only provide much-needed distraction, they will help the company focus on its North American growth. That said, while Ontario's iGaming market is showing signs of potential, some analysts have noted that its start has been somewhat disappointing, so IGT will be eager for the market to show those signs of potential as soon as possible.

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TABCORP TO SELL EBET1, LAUNCHES NEW APP

Tabcorp has agreed to sell its eBet1 business to Venue Digital Technology for AU\$62m (US\$41.6m) in cash.

The deal, subject to working capital and other minor adjustments, is expected to result in a pre-tax gain of around AU\$39m on completion and is targeted to be done by the end of H1 FY23.

As part of the agreement, Tabcorp has stated it'll be eligible for a break fee of AU\$3m – which could rise to AU\$10m in certain circumstances – where the agreement is terminated due to the buyer failing to obtain the necessary probity approvals or failing to complete the sale.

A supplier of loyalty and tracking systems to gaming venues in Victoria and New South Wales, eBet generated EBITDA of AU\$4.4m and an EBIT loss of AU\$2m in FY22.

Tabcorp Managing Director and CEO Adam Rytenskild said after announcing the deal: "The transaction announced today allows us to simplify our gaming services business as we pivot to an

integrity services model.

"This deal continues the urgent implementation of Tabcorp's transformation strategy. The potential sale of eBet was disclosed at the release of our FY22 results and we are pleased to have entered into the agreement swiftly and in line with our new strategic direction."

Also this week, Tabcorp has released the first version of its new wagering app. Australian bettors can now download and place wagers using the Tab app, which is built on Google's open source "Flutter" software. As a result, it is now faster to place a bet and easier to access personal betting information, among other new features.

GI Verdict: The deal appears to be ideal for Tabcorp, as it will either see its EBIT loss from eBet1 recovered by a break fee, should Venue fail to uphold the terms of the sale, or it will sell a business it was already perfectly willing to sell.

So now it seems all of the risk is on Venue Digital Technology to get the best it can from eBet1.

THE WEEK IN QUOTES

“Bodex is truly revolutionary for the sports betting market. It will allow the sports betting market, and especially the esports betting market, to fully reach its potential. This is an exciting time for the sports betting industry and we are proud of what our team has achieved to be at the forefront of this development. Our new and innovative platform Bodex creates a win-win situation for both providers and operators.”

Bayes Esports CEO and Managing Director Martin Dachzelt on the company's new central integration platform for betting odds, known as Bodex

“I am delighted to be joining FanDuel and Craig as a Responsible Gaming Ambassador. I appreciate how serious the team at FanDuel takes this issue, as it's one of personal importance to me. Being able to use my platform to advocate to sports fans a play well lifestyle is something I'm proud to be a part of.”

Seven-division boxing champion Amanda Serrano on her new position as a FanDuel Responsible Gaming Ambassador

GAMCARE TARGETS UNAFFORDABLE LENDING

GamCare this week announced its recommendations the gambling industry should take on board to mitigate unaffordable lending, following an insight workshop conducted by the charity.

The charity first highlighted the need for firms to implement programmes of cultural change. It says this could be achieved by fostering improved staff awareness and that staff should be better trained to signpost customers to free tools and services.

Second, improving affordability assessments by applying a gambling harm lens; a system that will define a meaningful set of indicators and interventions by working with charities, and those that have lived experience of harmful gambling.

Finally, GamCare recommends reducing as much friction as possible to support gamblers trying to stop; such as by not having automated credit increases for at-risk customers.

On the list of recommendations,

Colin Walsh, GamCare's Lived Experience Manager, said: “I know from my personal experiences, and I now see first-hand through our lived experience community, how quickly gambling can escalate when it becomes problematic.”

GI Verdict: As a charity, it is in GamCare's interest to continually push the industry to hold itself to account when it comes to unaffordable lending, an issue that can certainly arise when problem gambling become a factor.

Of course, the constant criticism of charities that deal with nearly anything is that none do enough to help the root cause of the problem.

Though defenders will say operators have infinitely more resources than a charity to actually deal with any issues that arise.

So, GamCare's recommendations to the industry are both helpful yet already largely known by operators when it comes to dealing with unaffordable lending.

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"We are delighted to receive approval from the Mississippi Gaming Commission, which now paves the way for an extensive rollout in this key state. We are thrilled we can now supply "Certified Perfects" dice alongside our world-renowned TCSJohnHuxley roulette wheels that integrate with our Blaze roulette tables and Winning Number displays. TCSJohnHuxley is a turnkey supplier of live table game equipment, and we hope our customers in Mississippi will enjoy the products and services we can now offer in this state!"

Phil Lee, TCSJohnHuxley Managing Director for the Americas, upon the group being granted licence approval by the Mississippi Gaming Commission

"The SportsGrid video content is immediately available for publisher websites and mobile applications. With the kickoff of the college and NFL regular seasons, SportsGrid's talent and analysts are uniquely qualified to provide publishers with unrivalled sports betting intelligence and insights."

Jason Sukhraj, GM of Syndication for SportsGrid, commenting on the group's new partnership with Sportradar

EASE GAMING SHUT DOWN BY SWEDISH REGULATOR

Earlier this week, Sweden's Gaming Inspectorate announced it had stopped Ease Gaming from operating in the country, as the company does not hold a necessary licence to do so.

The ban, which has come into immediate effect, was handed down by the regulator following a supervisory case – which found the company had provided games to the Swedish market under the brand Casineia.com.

The Inspectorate's investigation discovered the website featured Sweden as a selectable country when creating an account, offered customer service in Swedish and had information printed in the language for customers.

The licence held by Ease Gaming has no jurisdiction in Sweden, as the company operates out of Curaçao – and when asked for comment by the regulator, Ease Gaming failed to respond.

GI Verdict: Through its actions, Ease Gaming is considered an illegal offshore company, so it can have little complaint about the ban given to it by the Gaming Inspectorate.

However, the way the operator has clearly cheated the system in Sweden begs the question, how long has it done this?

And, where else is it currently operating illegally?

The rules for operating in the Nordic country are known to be stricter than others, so for Ease Gaming to return to Sweden – if it was even brazen enough to think it could – the chances now appear to be very long indeed.

After operating illegally, and subsequently being caught, Ease has now lost what must have been a valuable market – otherwise, why would it have risked operating there in the first place?

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PENNSYLVANIA- AUGUST REVENUE

Fantini Research partners with *Gambling Insider* to provide weekly gaming industry data. This week, we look at total gaming revenue in Pennsylvania for August.

Hollywood Morgantown saw the greatest year-on-year gains for August, rising 245% from August 2021. Hollywood York also had success, posting numbers 85% greater in 2022 than in 2021. Elsewhere, the Lady Luck Nemaocolin had the worst year-on-year results, dropping 27% from August 2021.

In terms of sports betting, Hollywood York saw a 520% rise in revenue, the greatest rise of any destination in Pennsylvania. Presque Isle had the most unfortunate results, with sports betting revenue dropping 36% in August 2022.

ALL-SOURCES REVENUE	AUGUST REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Hollywood Morgantown (PENN)	\$8.816	+245.27
Hollywood York (PENN)	\$8.853	+85.29
Valley Forge (BYD)	\$46.271	+46.89
Caesars Interactive	\$3.210	+33.93
Hollywood (PENN)	\$61.523	+22.12
Mohegan Lehigh Valley	\$0.090	+18.03
The Meadows (PENN)	\$26.757	+5.85
Live! Philadelphia (Cordish)	\$21.736	+1.88
Live! Pittsburgh (Cordish)	\$9.345	-1.99
Mount Airy	\$23.133	-4.31
Parx (Greenwood)	\$56.238	-4.66
Wind Creek Bethlehem	\$42.764	-5.01
Rivers (Rush St)	\$29.600	-6.62
Rivers Philadelphia (Rush St)	\$45.200	-7.21
South Philly Turf Club (Greenwood)	\$0.198	-9.59
Mohegan Sun	\$18.908	-13.68
Harrah's Philadelphia (CZR)	\$14.292	-14.68
Presque Isle (CHDN)	\$10.389	-16.83
Lady Luck Nemaocolin (CHDN)	\$1.739	-26.83
Fantasy Sports	\$0.841	-47.76
Parx at Malvern (Greenwood)	\$0.034	N/A
Total	\$429.938	+4.41

MULTIPLE PROPERTIES	AUGUST REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Penn National	\$105.949	+27.67
Greenwood	\$56.436	-4.68
Rush Street	\$74.800	-6.98
Churchill Downs	\$56.436	-18.43
Cordish	\$31.081	-29.59

LEGACY CASINOS	AUGUST REVENUE (M)	CHANGE (%) YEAR-ON-YEAR
Hollywood York	\$7.919	+71.15
Valley Forge	\$11.330	-1.48
Live! Pittsburgh	\$9.185	-2.08
Mount Airy	\$17.489	-3.14
The Meadows	\$16.158	-5.30
Live! Philadelphia	\$18.452	-5.79
Wind Creek Bethlehem	\$40.967	-6.35
Parx	\$50.180	-7.62
Rivers	\$27.794	-8.38
Presque Isle	\$9.742	-8.97
Mohegan Sun	\$17.090	-12.68
Hollywood	\$15.255	-13.78
Harrah's Philadelphia	\$13.984	-14.97
Rivers Philadelphia	\$17.518	-15.48
Lady Luck Nemaquin	\$1.739	-26.83
Total Legacy Casinos	\$279.732	-5.54

SPORTS BETTING	AUGUST REVENUE (M)	OPERATOR	CHANGE (%) YEAR-ON-YEAR
Valley Forge	\$17.202	FLTR (FanDuel)	+188.10
The Meadows	\$10.599	DKNG	+29.00
Hollywood Morgantown	\$3.887	ENT/MGM	+52.25
Hollywood	\$2.346	PENN	+6.62
Rivers	\$1.807	RSI	+32.64
Parx	\$1.297	Greenwood	+4.06
Hollywood York	\$0.933	PENN	+519.72
Rivers Philadelphia	\$0.880	RSI	+1.56
Mount Airy	\$0.805	FLTR (FOX Bet)	+5.41
Live! Philadelphia	\$0.778	SGHC	+101.60
Mohegan Sun Pocono	\$0.422	Kindred	+7.08
Harrah's	\$0.308	CZR	+1.07
Presque Isle	\$0.229	CHDN	-35.51
Wind Creek	\$0.210	Betfred	+118.94
South Philly Turf Club	\$0.198	Greenwood	-9.59
Live! Pittsburgh	\$0.159	RSI	+3.58
Mohegan - Lehigh Valley	\$0.090	Kindred	+18.03
Parx at Malvern	\$0.034	Greenwood	N/A
Total Sports Betting	\$42.185	N/A	+66.63
Total Handle	\$363.047	N/A	+4.17

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FRIDAY

GUEST
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GAMING, RISKNARRATIVE**

Doyle of RiskNarrative (of LexisNexis Risk Solutions) on why operators must adopt modern, agile solutions if they are to ensure compliance with ever-changing regulations in the UK

Expect the unexpected. That's the mindset that online gambling operators in regulated markets around the world must take if they are to keep up with the ever-changing requirements they need to comply with. This was certainly the case in the UK market earlier this month when the Gambling Commission announced a last-minute update to new customer interaction requirements due to come into force on 12 September.

On 2 September, less than two weeks prior, the regulator notified operators they would still have to meet the majority of the new requirements from that date, but that some would be delayed until further notice pending consultation.

Keeping up with these updates, changes and announcements is a task in itself, but operators must also ensure their technology is capable of adapting to them at a moment's notice. Not only that, but it also needs to be able to do this without requiring significant development work.

An agile solution allows operators to make quick strategy changes and to react to constantly evolving regulations, as well as fraud and risk trends. This helps them mitigate risk during these periods of transition while continuing to onboard players safely.

One of the main reasons the Gambling Commission opted to delay the rollout of some of its new requirements was that operators said they could not implement them within the timeline set. This should come as a surprise, given that this is a tech industry at heart.

This is why it is vital for operators to upgrade their technology

stacks now, allowing them to be agile and nimble but also to unlock the power of automation – one of the new requirements put in place by the Gambling Commission to help better protect players.

Automation removes the reliance on humans and this mitigates an operator's exposure to human error. If a player triggers a marker of harm, the required action or intervention happens automatically and this all but removes the risk of a player slipping through the cracks.

It also frees up time for responsible gambling teams to thoroughly look through any referrals that require attention, adding additional safeguards for those most at risk.

Automation is being used by some operators, but not to its full potential. For example, an operator might have a system in place that can automatically pull a player report, but it might only be able to do that 24 hours after they have finished their gaming session. It might also take several people from several departments to put the report together.

This is inefficient for the operator, but it also means the damage can already be done by the time the player is flagged as having triggered a marker of harm and the required intervention made. This can mean non-compliance and lead to the Gambling Commission handing out fines.

By upgrading to a modern, agile technology stack, operators can respond in real time when markers of harm are triggered. Of course, they will also need to set relevant markers and triggers for each player, and to do that they will need to understand their standard playing pattern.

Once that is ascertained, they then need to set markers and triggers that alert them if the player begins to deviate away from these norms. This is done by setting hard rules that are monitored and, if broken, a predetermined action takes place automatically.

Again, this is why automation is so important, and also why operators must adopt cutting-edge technologies to ensure their systems are as efficient as they are effective.

The new requirements that came into force on 12 September will be the first of several over the next 12 months. The Gambling Commission has said its consultation will have concluded, with new guidance written and published by December.

Operators will then have two months to update their systems and processes to ensure compliance with the new guidelines. This delay should therefore be seen as a stay of execution, and operators must now push adopting agile technologies to the top of their priority lists.

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THE THREE TALES OF REGULATION

During another very busy week within the gambling sector, it was unfortunately inevitable that regulation and sanctions would play a part in the news cycle.

Three examples, in particular, stood out. The first was in Australia, where Crown Resorts found itself limited to a cash cap of AU\$1,000 (US\$671.70) every 24 hours. Now, this move from the Victorian Parliament was an interesting one for two reasons: one, after all of Crown Resorts' misdemeanours (and those of the Star Entertainment, too) there were finally some genuine consequences for Australian casinos.

The \$1,000 limit significantly strengthens anti-money laundering capabilities, or at least the capability to oversee Crown's anti-money laundering policies. The caveat, however, is that anyone who gambles more than the given sum will have

to use casino-issued cards. This, ultimately, still leaves the balance of power with Crown Resorts.

In the UK, there were two less-straightforward cases. In our second case, the sanction is very clear, understandable and justified. The involvement of a third party, though, could arguably make a case for a dilution of blame.

The case in question saw Betway fined £408,915 (\$463,654) by the Gambling Commission. The operator was punished for its marketing appearing on the children's pages of West Ham United Football Club. Betway told *Gambling Insider* this was due to a "technical error" and rightly accepted the fine. However, without defending Betway (which was clearly at fault), where was West Ham's supervision of what was going on the children's pages of its website?

Finally, in a case similarly relating to marketing that targets minors, a complaint about a MrQ advert on Reddit was upheld by the Advertising Standards Authority. This one was another intriguing case – you can see the logic in banning an advert that uses the Spider-Man character (largely associated with children's comics). But the Spider-Man meme chosen by MrQ is widely used in popular culture by adults. In all three cases, there is a fine line. Yet, overall, there was enough of a lack of care from all three operators to justify the eventual sanctions.

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