

# FOOTBALL INDEX

# BETTING INTEGRITY

# POLICY

## Version Control

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## 1. POLICY STATEMENT

The credibility and reputation of Football Index is paramount to its success, and a key cornerstone of that is fairness. The purpose of this policy is to identify and mitigate issues that might call the fairness of the platform into question, and to mitigate actions that might be considered cheating or otherwise unfairly advantage or disadvantage some or all of our customers.

The UK Gambling Commission published a paper in May 2019 “Protecting Betting Integrity” outlining its concerns and broadly outlining its strategy to ensure a collective approach was taken to ensure the correct levels of integrity are upheld.

In 2009, the DCMS established a Sports Betting Integrity Panel, now Forum, drawing together representatives of the betting industry, the police, players, sports governing bodies (SGBs), the legal profession and the Commission to make recommendations on the design and implementation of a collaborative approach to protect the integrity of UK sport and betting.

## 2. SCOPE

This policy applies to the operation of and activities conducted under the Football Index brand. Specifically, this comprises the limited entities of IndexLabs Ltd, BetIndex Ltd and Tradex Ltd together with any other relevant associated entities either now or which may arise in the future. Hereafter referred to as “the Company”.

## 3. LEGAL BASIS

The principal requirements and obligations on which this Policy is based are contained in:

- Section 42 of The Gambling Act 2005;
- UK Gambling Commission, Licence Conditions and Codes of Practice; specifically:
  - Operating Licence Condition clause 15.1.2
  - Code of Practice Provision 4.2.8
  - Code of Practice Provision 7.1.3
  - Code of Practice Provision 8.1.2
- Jersey Gambling Commission, Code of Practice for Responsible Gambling by Remote Gambling Operators; and
- UK Gambling Commission Enforcement Report 2018/19

Additionally, advice published by the Sports Betting Integrity Forum has been reviewed and considered. The Company is currently looking to formally join this Forum.

## 4. OVERVIEW

The sharing of “Inside Information” by anyone captured by this policy is specifically prohibited by the Company.

‘Inside Information’ means any information, which is not “Publicly Known” that would materially affect peoples’ expectations relating to the participation in, or the likely or actual outcome of a sporting competition or event. Such information includes, but is not limited to, factual information regarding the competitors, the conditions, tactical considerations, injuries, or any other aspect of the sporting competition or event.

“Publicly Known” means any information that is already published as a matter of public record, able to be readily acquired by an interested member of the public, or disclosed according to the rules and regulations governing the relevant sporting competition or event.

## 5. CONTROL PROVISIONS

### 5.1. Employee use of Football Index

Employees are not allowed to have a Football Index account for their personal gain, either in their own name or that of a friend, family member or other personal acquaintance. The Operations team regularly monitors the customer database for employee names.

### 5.2. Test Accounts

Test accounts are permitted on a strictly controlled basis, in line with our test account controls, reference Annex A.

### 5.3. Insider Information

Employees are not allowed to share internal information or knowledge that might generate an advantage for the recipients with the public, or to friends, family members or other personal acquaintances, unless authorised in writing by a company director for the purposes of surveying or feedback. This includes data, announcements of promotions or product updates or other internal information.

Contractor and supplier agreements should specify that contractors may not use Insider Information for the purposes outlined for employees.

### 5.4. Conflicts of Interest

Employees are required to disclose any possible conflict of interest in their decision making to their manager in order to ensure fair and unbiased decision making. This includes changes to the product

or platform, selection of content used in advertising and customer communication, design of promotions.

Employees should never administer their own test or historical accounts or that of a friend, family member or other personal acquaintance and should always redirect direct requests from such people to the proper official support channels.

If a customer survey is being produced to support decision making, it must be sent to an appropriate audience, and where possible assigned on the basis of account number, so that duplicate submissions and the results can be considered a balanced and representative response, not one that is skewed or influenced by particular customers for their gain.

### 5.5. Monitoring of Media Rankings

The Media monitor, Rankings and Dividend structure is designed such that unusual behaviour by individual titles Footballers or journalists seeking to influence results will be mitigated by the wide range of media titles available to contribute to scoring. Additionally the small nature of an individual dividend payment means that making a profit from influencing media dividend payments would need to be carried out over an extended and obvious period.

The Operations team regularly monitors the customer database for Footballer and Journalist names.

Some articles are removed based on our policy which is transparently communicated to customers.

The Media Rankings and Dividend structure is subject to annual internal review.

### 5.6. Monitoring of Customer Performance

The Operations team is responsible for regularly monitoring for outliers in customer profitability and consistency to identify customers that are unusually profitable or unusually unprofitable. While substantial winnings can legitimately be generated from Football Index, exceptional outlier results by a customer can indicate the possibility of unfair play, exploitation of bugs or fraud.

### 5.7. Monitoring of Market Manipulation

Because the dynamics of Football Index are in ways similar to a financial market, some of the same market abuse patterns are risks that we mitigate against.

- Self-trading (buying shares from oneself within a customer account) is not allowed systematically;
- The operations team monitor for large cancellations of the sell queue designed to allow collaborating customers to buy shares cheaply, or to generate volatility in the market;
- The operations team monitor for 'Pump and Dump' behaviour;
- The operations team monitor for unusual and exceptional trading behaviour; and
- Bot use

### 5.8. Footballer Name Changes and Aliases

In general, the name supplied by our data supplier will be used, however in some cases we have seen that media outlets consistently refer to a footballer by a commonly known alias. Special

Characters in general are replaced for ease of customer search. On the basis of customer feedback the Operations team analyse suggested aliases and may add them if the alias has been used by more than one qualifying media outlet, and does not create substantial false positive matches or the possibility of an unfair advantage for customers that hold that footballer.

## 6. REGULAR REVIEW

Assessments of the Company's gambling services will be made on a regular basis. The Company will make such changes as are reasonably necessary to comply with changes that are published in the Licence Conditions & Codes of Practice or any other applicable rules or regulations.

This Policy will also be reviewed annually or as required. Any review will be approved by the Governance, Risk and Compliance Committee in the first instance. All relevant stakeholders and decision makers will be consulted prior to final approval from the Board.

## 7. NON-COMPLIANCE

It is the responsibility of all employees to comply with this policy. Failure to do so may result in employee disciplinary action.

No changes are to be made to this policy without the approval process outlined in point 6. Policies are stored securely with restricted access.

## Annex A

### Production Testing Policy

#### 1. Scope

This policy applies to the operation of and activities conducted under the Football Index brand. Specifically, this comprises the limited entities of Index Labs Ltd, BetIndex Ltd and Tradex Ltd together with any other relevant associated entities either now or which may arise in the future. Hereafter referred to as “The Company”.

#### 2. Introduction

From time to time, it is important for us as employees, to test in production and we encourage it, however in order to minimise any potential impact on our customers and our data quality we need to set controls around how we carry that out. The purpose of this policy is to create some rules and controls and recommendations around that process.

#### 3. When to test in production

For the most part automated and pre-release tests should make it unnecessary to test in production, however good reasons to test in production include:

- Verifying a release
- Smoke testing of important functionality
- Replicating reports of bugs or issues that can't be repeated in dev or staging for some reason
- Exploratory testing
- Testing payments end to end so that transactions don't point at a sandbox account
- When not to test in production

We should first try and test any issue in a development or staging environment. If you can replicate a bug or issue there, it should be fixable on that basis without using production.

## 4. Test Account creation and registration

**You may not share any account (including test accounts), this is against our ISO security policies.**

**You must not credit your test account yourself**

### Step 1:

Please follow the normal sign up procedure to create an account, using this email procedure: When registering a Football Index account, by appending a plus (“+”) sign after your email address and after that, you can insert any combination of words or numbers to create any number of personalized email IDs with the same inbox. For example “lionel+messi@footballindex.co.uk” and “lionel+richie@footballindex.co.uk” both deliver email to the same address, so you will be able to get password resets etc. It can be useful to test with other domains and email formats as well.

### Step 2:

Email [TradexOperations](mailto:TradexOperations) on [operations@tradex-ltd.com](mailto:operations@tradex-ltd.com), with the account details so that they can flag your account as a test account. It’s important to do this promptly so that test account data is not inadvertently included in financial and regulatory reporting.

### Step 3:

If you need cash to be added to your new ‘test’ account please email [TradexOperations](mailto:TradexOperations), [operations@tradex-ltd.com](mailto:operations@tradex-ltd.com), they can credit your account up to a maximum of £50 for testing purposes, any amount higher than this requires your managers approval. If the total of your balance or portfolio increases in excess of £100 due to dividends or price changes, you must report this to the operations team.

## 5. Minimising impact on customers

- Transactions (If you require a cash balance on your new test account)
  - Unless it’s intrinsic to the test in question, use small or close to minimum transaction sizes and trade cheap players using low volumes of shares.
  - If you do a similar payment test multiple times, it can help to vary the amount by a penny
  - (£10.01, £10.02 etc..).
  - Should be as infrequent as possible while retaining the effectiveness of the test.
- User names should be discreet, follow community guidelines and not reference customers

If you believe you need to make production tests that might not have minimal to no impact on customers, this must be approved and documented by your manager.



## 6. Minimising financial impact

Creating a Football Index account has a cost in KYC checks of £1-2 per account.

Making a payment on an account has a cost in transaction fees approx. 1-2% of the transaction and a minimum of £ per withdrawal to card.

Some of our marketing is paid by performance, per install, per registration or based on buying thresholds to affiliates or other paid acquisition channels. If your test account has a cookie or is allocated to certain marketing channels, it might have a cost of up to £80 for a first deposit. It's fine for us to test functionality for those marketing partners, however, please report any examples to save us paying unnecessary marketing fees.

Unflagged test accounts could impact the amount of cash we set aside for customer protection and risk management if they have a substantial balance, portfolio or volume of bids.

Dev and staging environments may be pointed at sandbox versions of these suppliers and have less costs involved. Please note that staging environments are typically pointed at production accounts with these suppliers and could cause issues with financial reconciliation if there is significant activity over and above customer activity.

These costs and considerations should not discourage comprehensive and effective smoke tests and other areas that require testing, however we request that the volume of testing is considered against the value of its outcomes.

## 7. Test Account closure

When you finish using a test account, please let [TradexOperations operations@tradex-ltd.com](mailto:operations@tradex-ltd.com) know so that they can shut it down.

There is a manual process for the ops team to look at any test accounts that have not been active in 60 days and suspend them - please let them know if you are doing any kind of long term test on an account and they can make an exception so that your test is not interrupted.

As part of the exit processes of employees or contractors no longer employed by Football Index, test accounts should be included for closure and removal of shares and balance.

## 8. Ex-Employees and contractors and Safer Gambling

Employees at Football Index are not allowed personal customer accounts as laid out in the Betting Integrity Policy.

After finishing your employment or contract with Football Index, we withhold the right for you (as an ex-employee or contractor) not to be allowed a customer account with the company (Football Index and any related company) for a period of no less than 3 months after your end date. Employees and contractors supporting Football Index are regularly exposed to gambling advertising due to the nature of the business and should consider that in their own personal gambling. We encourage the use of gambling counselling services and in the case of having issues with their gambling, we encourage them to discuss it with their manager or the HR department.

## 9. Monitoring

- Test accounts and unreported accounts that display characteristics of test accounts are monitored by the Operations team regularly.
- Test account activity and monitoring is dip sampled regularly by the Compliance team.
- Test account activity is reported to the GRC.

## 10. Non compliance

Non-compliance with this policy may result in disciplinary action or contract review.