

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: BI share funds
Date: 06 July 2021 16:25:16
Attachments: [REDACTED]

All

Apologies that I am late in responding to this, however, if it helps, please see attached our previous advice which touches on this topic.

Kind regards

[REDACTED]

From: [REDACTED]
Sent: Friday, July 2, 2021 9:18 AM
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Subject: Re: BI share funds

Fab thanks all

Sent from my iPhone

On 2 Jul 2021, at 09:14, [REDACTED]
wrote:

Hi All

I would agree with [REDACTED] notes. Stakes committed to bets are NOT captured by our definition of customer funds within licence condition 4. Thereafter, we would expect licensees to manage their exposure/liabilities in a responsible way – as per para 4.2 of our Statement of Principles which requires licensees to, amongst other things, 'maintain adequate financial resources'.

Thanks

[REDACTED]
Gambling Commission
Victoria Square House
Victoria Square

Birmingham B2 4BP

[REDACTED]

www.gamblingcommission.gov.uk

From: [REDACTED]

Sent: Thursday, July 1, 2021 10:06 PM

To: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: BI share funds

Hi [REDACTED]

My view would be that, under the GC remit, the shares were set out as a bet i.e. the customer had put their money at risk buying a share/bet on the basis they believed they would get more money back via dividends, an increased cash out value (increase in the share price) or combination of both.

As with other operators, once a customer puts funds at risk those monies are removed from their wallet and become the Licensee's monies. In the period between the bet being placed and outcome being known our expectation is that the Licensee manages its cash flow such that it has sufficient monies to cover its cash out exposure and/or ability to pay out winning bets.

[REDACTED]

[REDACTED] We would then have expected BI to manage its dividend exposure and exposure to the portfolio instant sell value. During the compliance assessment it appeared the BI did manage its dividend exposure and but did not have full cover for the portfolio instant sell value. During the assessment the protection of the share portfolio was discussed with Commission Officials suggesting an insurance policy or an alternative would be prudent.

Kind regards

[REDACTED]

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From: [REDACTED]

Sent: Thursday, July 1, 2021 6:26 PM

To: [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: BI share funds

All

An interesting question from [REDACTED] which I think may be one for [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

We might have considered this but I cant bring it to mind.

[REDACTED]

[REDACTED]

GAMBLING COMMISSION

[REDACTED]
[REDACTED]

Website: www.gamblingcommission.gov.uk