

Regulatory Scrutiny of B2B Suppliers

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It's business. But it's personal.



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Outline

Evolving Regulatory Landscape

Gambling Commission Approach

Considerations for B2B Suppliers

Implications for B2C Operators

Conclusion

Evolving Regulatory Landscape



UK

Warning to suppliers
about content appearing
on unlicensed websites



Michigan

New requirement for disclosures about supply of unlicensed operators



Sweden

Financial penalties issued after suppliers' games appeared on unlicensed websites



Romania

Licensed suppliers must report every deal they sign with any operator



UK

Jurisdictional explanation
document

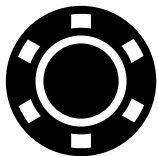


Gambling Commission Approach

Over 770 cease
and desist and
disruption notices

102,000 URLs have
been referred to
Google

264 websites have
been taken down



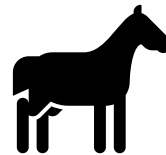
Dedicated Illegal
Markets Team

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It is ready to act if
supplier games
appear on illegal
sites



It will address any
failure to consider
illegal activities by
B2C operators



More compliance
assessments and
investigations into
B2B businesses

Gambling Commission Approach

Considerations for B2B Suppliers

Evaluate
onboarding
procedures to
elicit info from
outset

Ensure contracts
mitigate legal,
regulatory and
reputational risk &
enforce them

Demand
compliance
from all B2C
operator
clients

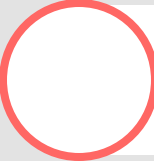
Use internet
scraping to
identify
unauthorised use
and issue cease
and desist

How can suppliers improve
their processes?

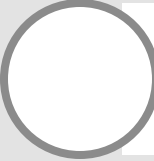
Implications for B2C Operators




Operators



Operators must adhere to the licensing objective to keep crime out of gambling



Social Responsibility Code provision 1.1.2 makes operators responsible for third parties they do business with, including suppliers



The Commission expects operators to have sufficient oversight of suppliers and receive necessary assurances



Have robust
onboarding
procedures in
place



Check whether they
have been subject to
regulatory
enforcement action

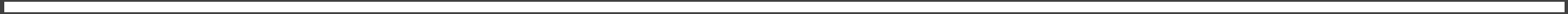


Have well-drafted
licensing
agreements in place



Include short notice
termination rights if
supplier actions
could affect the
operator's
reputation

Conclusion



Thank you.

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This presentation is intended only as a general statement of the law and no action should be taken in reliance on it without specific legal advice.