

PROTECTING INTEGRITY

Our approach to protecting integrity in sports and in our betting markets

Proyecto Pro B.V. (PPBV) is committed to being at the forefront of tackling corruption in sport and we believe we are 'best in class' when it comes to tackling match-fixing and betting integrity issues due to our unique approach and expertise.

- **Aligned aims:** When it comes to keeping sport and betting free from corruption, the interests of PPBV and Sports Governing Bodies (SGBs) are completely aligned. PPBV knows that its customers are only likely to bet in markets that they are confident are free from corruption, and it's fundamental to our business that we do all we can to keep them that way.
- **Transparency** is the key to fighting corruption and PPBV's exchange technology makes it among the most transparent betting platforms in the world.
- **Dedicated Integrity Team:** PPBV will dedicate an exclusive staff as Integrity Team with sophisticated forensic and analytical tools at their disposal. The Integrity Team is importantly non-commercially focused and is responsible for monitoring all betting activity on PPBV sports betting products to ensure that markets are being used in a fair manner and for investigating unusual and suspicious betting activity. All analysts within the team have extensive sporting and betting knowledge and have investigatory and intelligence analysis skill sets. The team proactively liaises with MOU partner SGBs, national betting regulators, and law enforcement agencies in the pertinent jurisdictions. Additionally, PPBV's Risk & Trading teams manage the risk across PPBV's Sportsbook products and work closely with our integrity team to provide our customers with an extra level of protection.

Our processes, tools, and systems

- **Audit trail:** Every transaction on PPBV is recorded and PPBV knows which account placed every bet. Detailed betting reports are available for the Integrity Team to utilize in real-time. For example, records are kept of every login and betting transaction.
- **Real-time monitoring and reporting:** PPBV's technology and audit trail means the Integrity Team analysts have access to a set of comprehensive reports, tools, and alerts that are used to monitor betting markets at an account level in real-time, before, during, and after an event. They are used to identify possible triggers of unusual or suspect activity.
- **Real-time alerting of suspect betting activity to sporting bodies:** In relation to PPBV MOU agreements the Integrity Team will alert an SGB MOU partner in real-time if suspect or unusual betting activity is identified on an event under their jurisdiction. This allows SGBs to implement any betting integrity-related procedures they may have.
- **Detailed account investigation:** If suspect or unusual betting is detected any accounts of interest will be thoroughly investigated by the Team's analysts. Account level analysis is important to determine if a bet is suspicious or not and whether there is a reasonable explanation for the betting that has taken place. A detailed analysis will be undertaken of the account's betting behaviour and financial transaction patterns and methods. Linkages and

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connections to other account holders or persons of interest will be explored through analysis of the accounts' registered personal details, computer forensics, and telephone calls. All this information can be shared with MOU partners and national betting regulators.

- **Action taken against suspect customers:** Customers who have bet suspiciously will have their accounts suspended and any winnings they have made from suspect betting on an event will be frozen pending investigation by the Integrity Team and any relevant external body.

- **Bet Monitor:** PPBV provides its SGB MOU partners and regulators with access to the Bet Monitor tool which allows them to monitor bets on events under their jurisdiction placed on the Betfair Exchange in real time. The betting information displayed on the Bet Monitor is in an anonymous format but is at an account level allowing MOU partners to monitor betting comprehensively and spot anomalies themselves.