



ELYS GAMEBOARD TECHNOLOGIES, LLC
&
GRAND CENTRAL, LLC

Responsible Gambling Plan



VERSION: 1.0
REVISION DATE: July 15, 2021

Contents

INTRODUCTION	4
CODE OF CONDUCT	5
Goals of the Plan.....	5
Pledge to our facility personnel...	5
Pledge to our patrons	5
TIMETABLE TO IMPLEMENT	7
INDIVIDUALS RESPONSIBLE FOR IMPLEMENTATION/MAINTENANCE OF PLAN	9
CHANGES TO THE PLAN.....	9
SPECIFIC DUTIES RELATED TO THE RESPONSIBLE GAMING PLAN	10
PROGRAM DEFINITIONS.....	11
PROBLEM/COMPULSIVE GAMBLING POLICIES & PROCEDURES	12
Symptoms of Pathological Gambling	12
Voluntary Exclusion.....	13
Self-Exclusion - Requests made directly to Grand Central	13
Self-Exclusion - Requests made directly to OLG	13
Voluntary Surrender	14
Official Voluntary Exclusion Program List	14
Tracking of Voluntarily Excluded Patrons	14
Request for Removal from the Voluntary Exclusion Program.....	15
Grand Central Involuntary Exclusion.....	16
OLG Official Involuntary Exclusion List.....	17
Tracking of Involuntary Exclusion	17
Grand Central Financial/Marketing Material Self-Limitation Programs.....	17
UNDERAGE GAMBLING POLICIES & PROCEDURES.....	18
UNATTENDED CHILDREN POLICIES & PROCEDURES	19

RESPONSIBLE ALCOHOL SERVICE POLICIES & PROCEDURES.....	20
REPORTS AND NOTIFICATION TO OLG.....	21
REQUIRED SIGNAGE / BROCHURES / GAMBLING HELP INFORMATION.....	22
RELATIONSHIP WITH NCPG.....	22
CONCLUSION.....	22

INTRODUCTION

ELYS Gameboard Technologies, LLC, a company registered in Delaware, is a Management Services Provider (“MSP”) that is partnering with Grand Central, LLC a sports wagering Class B Operator in Washington, D.C. for the purpose of conducting sports wagering activity. This plan is for the use of the management and facility personnel of Elys Game Technology, Corp. and Elys Gameboard Technologies, LLC (collectively referred to as “ELYS”) and Grand Central, LLC (“Grand Central”) as a guide to their Responsible Gaming Plan (“Plan”).

ELYS and Grand Central are anticipated to conduct small, retail scale sports wagering activities at a licensed facility that involves anonymous wagering, as permitted under Washington, D.C. laws and regulations¹. This plan shall be used by ELYS and Grand Central to ensure best practices for said operations, in addition to achieving compliance with the District of Columbia’s Office of Lottery and Gaming’s (“OLG”) minimum internal controls (“MICS”), and any other applicable regulations and standards related to responsible gaming observed by the OLG.

Grand Central, in cooperation with ELYS, is committed to providing the highest standards of customer care and to operate a venue where responsible gaming is a priority of all facility personnel as further described herein. Please note that the Plan is not just limited to responsible gaming, but also to the responsible service of alcoholic beverages. While gambling is enjoyed by many individuals responsibly, ELYS and Grand Central acknowledge that problem gambling and substance abuse are serious community issues and that a small proportion of patrons cannot or shall not gamble responsibly. The decision whether to gamble or consume alcoholic beverages are the prerogative of the individual. This Plan provides a framework through which ELYS and Grand Central can ensure its general practices are consistent with the community’s expectations and that our operation shall be conducted in a responsible manner. To this end, ELYS and Grand Central shall take steps to promote responsible gambling and responsible alcohol service.

¹ To the extent that ELYS and Grand Central’s operations evolve to offer mobile applications, ELYS and Grand Central shall revise this Plan to ensure compliance with all applicable requirements. Additional information is available upon request.

CODE OF CONDUCT

Goals of the Plan

ELYS, in cooperation with Grand Central, has developed this Code of Conduct for Responsible Gaming, consisting of, but not limited to, our goals and expectations for the Plan. Portions were provided by the American Gaming Association Code of Conduct for Responsible Gaming and Alcohol Consumption² and has been adapted for our use. Grand Central, in cooperation with ELYS, pledges to our facility personnel and patrons to make our Plan an integral part of our daily operation. This pledge encompasses all aspects of our business, from facility personnel training, operational policies & procedures, advertising and marketing. This Plan also covers the commitment of our facility personnel and their continued support of our initiatives and public awareness surrounding responsible gaming, the responsible service of alcoholic beverages and prevention of underage gambling and alcohol consumption.

Pledge to our facility personnel...

To provide a comprehensive training program to promote Responsible Gaming and Responsible Alcoholic Beverage Service.

ELYS, in cooperation with Grand Central, shall train facility personnel on responsible gaming and responsible alcohol service and provide annual refresher training. By educating our facility personnel through training, we shall enhance their understanding of the impact of problem gambling and substance abuse, on people at risk, and identified connections between excessive gambling and substance abuse on socio-economic, health and community safety issues.

Grand Central, in cooperation with ELYS, shall implement communication programs for facility personnel to improve understanding of responsible gaming, alcohol service and related policies and procedures.

Grand Central, in cooperation with ELYS, shall distribute to new facility personnel brochures describing responsible gaming and the responsible service of alcoholic beverages and where to find assistance.

Grand Central, in cooperation with ELYS, shall educate the facility personnel about their ability to utilize Employee Assistance, Local Support and Encouragement Programs to help address any gambling or alcohol related problems they may have.

Pledge to our patrons ...

...To Promote Responsible Gaming.

Grand Central, in cooperation with ELYS, shall make available brochures describing responsible gaming and where to find assistance. These shall be available at the facility, information area and Cashier Cages in accordance with Title 30 DCMR § 2110.2(b) and 2128.1(e).

² <https://www.americangaming.org/responsibility/member-code-of-conduct/>

Grand Central, in cooperation with ELYS, shall conspicuously post at the Sports Wagering Facility the Operator and the name of the Sports Wagering Manager on duty in accordance with Title 30 DCMR § 2112.2, Title 30 DCMR § 2110.1 and 2128.1(e).

Grand Central, in cooperation with ELYS, shall display at the main public entrances to the gaming area and at Kiosks signage that can be easily read bearing a toll-free helpline number and website.

Grand Central, in cooperation with ELYS, shall make available to patrons and facility personnel information generally explaining the probabilities of winning or losing at the various sports wagering related events.

Grand Central, in cooperation with ELYS, shall provide opportunities for patrons to request in writing that they not be sent promotional mailings of any kind and for revocation of financial services.

Grand Central, in cooperation with ELYS, reserves the right to exclude a patron from gaming, without a request from the patron.

Grand Central, in cooperation with ELYS, shall make available to patron information regarding the availability of problem gambling and substance abuse support services.

...To Prevent Underage Gambling and Unattended Minors in the Sports wagering facility.

Grand Central, in cooperation with ELYS, shall make a diligent effort to prevent underage individuals from entering the gaming area of the sports wagering facility. Minor is any individual under the age of eighteen (18), pursuant to D.C. Code § 36-621.07(c)(10)(A), Title 30 DCMR § 2109.1(b), 2109.1(c), and 2128.1(k).

Grand Central, in cooperation with ELYS, shall communicate the legal age to gamble through appropriate signage and/or brochures at all entrances, information area, Kiosks and Cashier Cages.

Grand Central employees working in relevant areas shall receive training in appropriate procedures for dealing with unattended children, underage persons attempting to enter the facility or gamble.

...To Serve Alcoholic Beverages Responsibly.

Grand Central shall observe a responsible alcohol beverage service policy, including the following elements:

- Grand Central shall not knowingly serve alcoholic beverages to a minor.
- Grand Central shall not knowingly serve alcoholic beverages to a visibly intoxicated patron.
- Grand Central shall make a diligent effort not to permit access to the gaming facility by a visibly intoxicated person.

Grand Central shall train facility personnel in the company's responsible alcohol beverage service policy and shall provide annual refresher training to facility personnel.

...To Advertise Responsibly.

Grand Central, in cooperation with ELYS, advertising and marketing shall:

- Contain a responsible gaming message, including the toll-free helpline number and website to the National Council on Problem Gambling 1-800-522-4700 / www.ncpgambling.org/chat
- Reflect generally accepted contemporary standards of good taste.
- Comply with all jurisdictional regulations, along with D.C.'s and federal standards.

Grand Central, in cooperation with ELYS, advertising and marketing materials shall not:

- Contain cartoon figures, symbols, celebrity/entertainer endorsements and/or language designed to appeal specifically to children and minors.
- Feature anyone who is, or appears to be, below the legal age to participate in gaming activity.
- Contain claims or representations that gaming activity shall guarantee an individual's social, financial, or personal success.
- Be placed in media specifically oriented to children and/or minors.
- Appear adjacent to, or in close proximity to, comics or other youth features, to the extent controlled by Grand Central.

...To Collaboration with Other Stakeholders.

No one group or organization has all the answers. We believe that a collaborative approach to finding solutions is the best way to reduce problem gambling and substance abuse.

- Work closely with and in partnership with the Office of Lottery and Gaming.
- Support the OLG's initiatives during the annual National Problem Gambling Awareness week.
- Learn from local service organizations and raise awareness of the impact of gambling problems and substance abuse.

...To Continuous Improvement.

The search for better ways to reduce the risk of problem gambling and substance abuse is a continuing process.

- In cooperation with ELYS, Grand Central's responsible gaming culture shall be characterized by continuous improvement, a readiness to learn from others and a determination to adopt best practices available to our patrons. ...

...To Prevent Future Problems.

- To reduce future incidents by taking a proactive approach of continuous training of our facility personnel; and
- To promote a responsible gaming experience for our patrons by continuing to foster informed player choices.

TIMETABLE TO IMPLEMENT

This Plan shall be effective at the start of gaming operations with all newly hired facility personnel trained in orientation prior to starting in their job. The sports wagering facility shall conduct annual refresher Responsible Gaming training for all facility personnel. The sports wagering facility shall provide OLG's

Responsible Gambling Program Specialist with a quarterly report detailing any new facility personnel, when they received their training, and any employee who has received their annual refresher training including date of that training.

INDIVIDUALS RESPONSIBLE FOR IMPLEMENTATION/MAINTENANCE OF PLAN

Grand Central, in cooperation with ELYS shall establish a Responsible Gaming Committee, with the Grand Central General Manager and/or ELYS' CEO acting as Chairman(s). The Responsible Gaming Committee is comprised of the following permanent members:

- Grand Central Head of Security and Surveillance
- ELYS Head of US Legal Affairs
- ELYS Head of Product Compliance
- Grand Central Sports Wagering Manager(s)

Any other personnel the General Manager believes to be necessary to accomplish the goals of the program shall be included on the Committee on an ad-hoc basis.

CHANGES TO THE PLAN

The Responsible Gaming Committee shall continue to refine the Plan and submit all amendments to the approved Responsible Gaming Plan to the OLG for approval. All submission shall also include the *Change in Operations Request Form* to the OLG for approval. In accordance with Title 30 DCMR § 2128.2, approval shall be requested within ten (10) business day of any changes to the plan and at license renewal. Submissions for revisions of our Responsible Gaming Plan shall be made to the Commission in the following format:

- a) Grand Central, in cooperation with ELYS, shall submit a copy of the impacted section of the approved plan with changes indicated utilizing the "track changes" feature of MS Word.
- b) Revised copy shall include original approval date of the existing plan and the date that the proposed revision is submitted.
- c) Grand Central, in cooperation with ELYS, shall also provide a narrative explaining the reason for the requested revision and the target date for implementation. Additional pages shall be attached if necessary.
- d) A statement from the Chairmen of the committee, or their designee, attesting that the proposed changes conform to the requirements as stated in the OLG.
- e) The revised document and required certifications shall be e-mailed to the Responsible Gambling Program Specialist Coordinator. The change document shall be sent as an attachment in MS Word format.
- f) Grand Central, in cooperation with ELYS, requests that the OLG confirm by e-mail within 3 business days that the proposed plan changes have been received.
- g) The OLG's Responsible Gambling Program Specialist shall review and work with Grand Central and ELYS on any proposed change. Once all parties are in agreement, the OLG shall be presented with the proposed changes.
- h) After the OLG approves the changes, the OLG shall communicate to Grand Central or ELYS, in writing, indicating if the OLG result of the vote and:
 - a. Shall accept the change as submitted, or

- b. Reject the submission, as not in the best interest of the District of Columbia and the OLG, or
- c. Propose a revision. In this case, the OLG shall communicate in writing to ELYS about further changes that shall have to be made to the submission before acceptance by the OLG.

If necessary and required by the OLG and if Grand Central and ELYS accept the OLG's recommended changes, Grand Central, in cooperation with ELYS shall make the changes as suggested by the OLG and re-submit the request for change document.

If Grand Central, in cooperation with ELYS, does not accept the OLG's recommended changes, an additional change request may be submitted. The process above shall be repeated until the OLG and Grand Central or ELYS are completely satisfied with the redlined document.

The OLG shall send to Grand Central and ELYS an accepted version of the submitted request for change with date and signature signifying approval.

The OLG shall make every effort to make a determination concerning a submission for change in a timely manner. If more than 60 days following receipt of the change is necessary, the OLG shall notify Grand Central or ELYS.

Grand Central, in cooperation with ELYS, shall not alter its Responsible Gaming Plan unless and until the OLG approves such changes in writing. Grand Central, in cooperation with ELYS, shall maintain a log of all changes and amendments to its Responsible Gaming Plan, including the initial submission approval date and the date the revision is approved by the OLG. Each page of the approved Responsible Gaming Plan shall contain the date on which it was approved by the OLG.

SPECIFIC DUTIES RELATED TO THE RESPONSIBLE GAMING PLAN

Responsible Gaming Committee – Develops and implements the Responsible Gaming Program; monitors compliance with and effectiveness of the Program; suggests changes to the Program; and upon approval of the OLG implements such changes.

Grand Central General Manager - Primary contact person for the OLG on issues related to responsible gaming. Responsible for ensuring that all newly hired facility personnel receive responsible gaming training prior to beginning their job duties. Ensures that all existing facility personnel receive annual refresher training in responsible gambling. Moreover, he/she is responsible for preventing the over service of alcohol to visibly intoxicated and underage individuals and for notifying the Security Department to prevent individuals from gaming after having been determined to be visibly intoxicated. Facility personnel who serve alcoholic beverages and their immediate supervisors shall be SERV Safe Food and Alcohol certified. The General Manager ensures that all individuals who have requested voluntary exclusion, or who have been placed on an exclusion list, are properly entered into appropriate Logbook. He/She is also responsible for ensuring that no individuals who are underage or who are on the exclusion or voluntary exclusion lists receive marketing materials.

Facility Teller's Operator – Responsible for attempting to recognize excluded and voluntarily excluded individuals, identification of underage and intoxicated individuals and the prevention of underage and

intoxicated gaming. Unless they are aware a player is on the exclusion list, they are also responsible for checking for exclusion or voluntary exclusion status before paying any winning wagers of \$600 or more.

Sport Book Manager - Responsible for ensuring that all individuals who have requested any restrictions are properly entered into the Surveillance Logbook and attempting to recognize persons and individuals who are underage or who are on the exclusion, voluntary exclusion or financial restricted lists attempting to cash a check/negotiable instrument.

Head of Security and Surveillance - Responsible for the electronic monitoring of all gaming areas and limited portions of the food and beverage areas in the facility. The Head of Security and Surveillance and all surveillance personnel are responsible for monitoring covered areas for intoxicated individuals, individuals appearing under the age of 18 who are in the sports wagering facility and/or are engaged in gaming activities, and visual identification of excluded and voluntarily excluded individuals. The Head of Security and Surveillance is also responsible to maintain a Surveillance Logbook (which may be a physical book or electronic media) that includes the list of Patrons that are excluded, voluntarily excluded, and financially restricted from sport wagering or that have opted to not receive marketing material.

Security Facility personnel – The Security Department is responsible for the enforcement and reporting of operational efforts which relate to the prevention of underage gambling, intoxicated gambling, and gambling by excluded and voluntarily excluded individuals. This includes identifying and removing intoxicated, underage, excluded and voluntarily excluded individuals from the sports wagering facility.

Surveillance Logbook – It's the record of all the events related to all the security and responsible gaming events. It's maintained by the Head of Security and Surveillance, and all facility authorized personnel shall be familiar with the location of the logbook and its content.

PROGRAM DEFINITIONS

The following definitions apply:

“Problem Gambling assistance message” shall mean the phrase: “Please play responsibly, for help visit <https://www.dclottersportsbetting.com/operating-sports-betting/responsible-gaming/problem-gambling-resources/> or call the National Council on Problem Gambling at 1-800-522-4700.”

“Expanded Gambling Assistance Message” shall mean the phrase: “Please play responsibly. For help, visit <https://www.dclottersportsbetting.com/operating-sports-betting/responsible-gaming/problem-gambling-resources/> or call the National Council on Problem Gambling at 1-800-522-4700. This email is not intended for any individuals who have been accepted to the self-exclusion program administered by the OLG.”

“If you or someone you know has a gambling problem, call or text the National Council on Problem Gambling at [1-800-522-4700](tel:1-800-522-4700) or chat ncpgambling.org/chat.”

The above links are operational, they have been tested and will be subject to periodic review. Where the links is no longer available or not available for a significant period of time, ELYS and Grand Central shall provide an alternative support service in accordance with MICS 10.2.2 (d).

“This email is not intended for any individuals who have been accepted to the voluntary exclusion program administered by the OLG.”

“Underage warning message” means the phrase: “No person under the age of 18 is permitted to wager in the sports wagering facility” or “The District of Columbia law requires an individual to be 18 years of age or older in order to participate in any sports wagering activity.”

“Problem Gambling”: The term “problem gambling” describes gambling behaviors that compromise, disrupt or damage personal, family or vocational pursuits. It is a treatable condition. Counseling, using a variety of treatment approaches, can provide solutions.

“Involuntary Exclusion”: At its discretion, Grand Central, may remove from the sports wagering facility an individual deemed to be unruly, intoxicated, impaired or otherwise detrimental to the safe and efficient conduct of Sports wagering operations.

“Incident Report” form is prepared to document an incident that requires an individual to be evicted from the premises that may become unruly, intoxicated or impaired and may pose a danger to patrons or facility personnel.

“Application for Voluntary Exclusion” an individual may request to be excluded from all District of Columbia sports wagering facilities, which includes Grand Central. The designated application for self-exclusion shall be provided by the OLG.

“Request for removal” means a request submitted by a voluntarily excluded individual stating that the individual wishes to be removed from the voluntary exclusion list. This request can only be submitted to the OLG after the individual has completed their duration period.

“Request for voluntary exclusion” means a request completed by an individual for placement on the voluntary exclusion list.

“Voluntarily Excluded Individual” means any individual whose name is included, at his or her request, on the voluntary exclusion list maintained by the OLG.

“Voluntary Exclusion” is an individual who wished to be excluded from participating in any gaming activity in the District of Columbia. This includes prohibiting the individual from entering any gambling facility in Washington, D.C.

“Voluntary Exclusion List” is defined as a list maintained by the OLG of individuals who requested to be excluded from properties in Washington, D.C.

PROBLEM/COMPULSIVE GAMBLING POLICIES & PROCEDURES

Symptoms of Pathological Gambling

ELYS and Grand Central undertake to monitor our patrons in order to identify signs or triggers of problem gambling, assessing and addressing situations where a player indicates they are in distress or experiencing problems. Listed below are signs and triggers that can help us recognize pathological gambling.

A gambler is affected by pathological gambling if he or she has at least five of the following symptoms:

- He is absorbed in gambling, e.g., he is continually intent on reliving past gambling experiences, planning the next gambling venture, devising ways to obtain money to gamble;
- Needs to play larger and larger amounts of money to achieve the desired state of excitement;
- Attempts to reduce, control or stop gambling, but without success;
- Is restless and irritable when attempting to reduce or stop gambling;
- Gambles to escape problems or to relieve a dysphoric mood, e.g., feelings of helplessness, guilt, anxiety, depression;
- After losing at gambling, often returns another day to gamble again, chasing his losses;
- Lies to his or her family, therapist, or others to conceal the extent of gambling involvement;
- Committed illegal acts such as forgery, fraud, theft, or embezzlement to fund gambling;
- Has jeopardized or lost a significant relationship, job, or educational or career opportunity because of gambling;
- Relying on others to raise money to alleviate the financial hardship caused by gambling.

Voluntary Exclusion

Self-Exclusion - Requests made directly to Grand Central

Any individual who requests to be placed on a list of individuals voluntarily excluded from properties in Washington, D.C. shall be referred to the OLG Responsible Gambling Program Specialist. All communication made to or by the OLG concerning the voluntary exclusion program shall be entrusted to the Grand Central General manager or the Management of ELYS.

“Application for self-exclusion” forms: An individual may request to be voluntarily excluded from all Washington, D.C. sports wagering and gambling facilities by completing an application for self-exclusion on a form designated and provided by the OLG. The application for self-exclusion shall be completed by an individual at the OLG office in the presence of the Responsible Gambling Program Specialist or designee.

Any individual requesting to be excluded from the sports wagering facility must complete “Application for Self-Exclusion” form shall be maintained as follows:

OLG’s Responsible Gambling Program Specialist shall handle all self-exclusion applications. After the application has been reviewed and approved by the OLG Responsible Gambling Program Specialist, we shall receive an Advisory notice, which shall include a photo and all pertinent information for the individual. The “Application for Self-Exclusion” form shall state that any individual making a request for self-exclusion shall be prohibited from entering any sports wagering facility in the District of Columbia for the duration period selected accordingly with the request (Title 30 DCMR § 2129.16).

Self-Exclusion - Requests made directly to OLG

Once an individual has been added to the Self-Exclusion List, a copy of the “Advisory Notice” shall be emailed by the OLG’s Responsible Gambling Specialist to the General Manager of Grand Central, along with a picture of the individual (if available).

The OLG shall notify the General Manager of Grand Central of any changes or deletions to the “Voluntary Exclusion Program” list after an individual has been processed and approved.

Voluntary Surrender

An individual who has requested voluntary exclusion must immediately surrender all unredeemed gaming tickets with monetary value that the individual has received or is due to receive from the gaming facility. Grand Central shall refer any individual requesting voluntary exclusion to the OLG Agent who shall assist the individual.

Official Voluntary Exclusion Program List

The OLG shall maintain the District of Columbia's Self-Exclusion Program list and shall notify the General Manager of Grand Central of any changes to the list by emailing an Advisory in accordance with voluntary exclusion rules and regulations. The Head of Security and Surveillance shall maintain copies of the OLG's Washington, D.C. Voluntary Exclusion advisories in a logbook (which may be a physical book or electronic media) to permit appropriate facility personnel to review and identify voluntarily excluded individuals.

The Head of Security and Surveillance shall maintain Surveillance Logbook. Security Department facility personnel shall have access to the Logbook and the Surveillance Logbook shall be placed in the monitor room.

Tracking of Voluntarily Excluded Patrons

Upon receipt of the "Self-Exclusion Advisory," Notice of Placement" from the OLG Responsible Gambling Program Specialist, the General Manager and the Head of Security and Surveillance shall be the solely responsible for placing the advisories into the Logbook.

In accordance with the OLG's guidelines, the advisory shall be entered into the logbook within 72 hours of receipt from the OLG.

Grand Central shall remove persons enrolled in the Self-Exclusion Program from any direct marketing activity, both physical and electronic. Grand Central shall also ensure that excluded person are removed from third parties mailing lists prior to mailing by comparing it to the Self-Exclusion Program list.

Additionally, these third-party mailings conducted on the behalf of Grand Central must contain the "Expanded Gambling Assistance Message".

No names or other personalized information is permitted to be included in the body of such mailings. Information furnished to or obtained by the OLG shall be deemed confidential and shall not be disclosed except to facility personnel whose duties and functions require access to the information.

Grand Central and its facility personnel or agents thereof shall not disclose the name of, or any information about, any individual who has requested voluntary exclusion to anyone other than facility personnel and agents of Grand Central whose duties and functions require access to such information.

Notwithstanding the forgoing, Grand Central, in cooperation with ELYS, may disclose the name of and information about a voluntarily excluded person to gaming affiliates of the licensee for purposes of excluding such persons from the facilities of the affiliate. There are two ways a person can be “flagged” as a voluntarily excluded person: the official Voluntary Exclusion Program list supplied by the OLG which contains all the names of individuals who are prohibited from entering the gaming area; and When a patron is “flagged” as voluntarily excluded in our system, their player account becomes invalid.

If a recognized and identified voluntarily excluded individual attempts to use Grand Central’s kiosks to place a wage, Security is called to escort the person to leave the facility and the Security personnel shall document the incident by filing an “Incident Report” form. The Security personnel or the Head of Security and Surveillance may also notify local law enforcement and proceed with criminal trespass charges against the voluntarily excluded individual. The report shall detail the following:

- Indication of ejection;
- Incident Number, date and time of incident, date and time of report;
- Location of incident;
- Name, including any aliases or nicknames;
- date of birth and address;
- Photo taken, Yes or No;
- Height, weight, hair color, and other descriptive information;
- Incident description;
- Signature of patron; and
- Signature of Security Department representatives.

The Security personnel on duty or the Head of Security and Surveillance are required to inform management of the incident. A copy of the “Incident Report” shall be forwarded to the OLG by the General Manager.

[Request for Removal from the Voluntary Exclusion Program](#)

Any voluntarily excluded individual may, upon the expiration of their duration period, may submit a request (Title 30 DCMR § 2129.16) to the OLG requesting to be removed from the voluntary self-exclusion list.

A decision whether to remove a person from the Self-Exclusion Program list shall be within the discretion of the OLG, subject to the fulfillment of all requirements by the individual making the request for removal from the Voluntary Self-Exclusion Program list.

The OLG shall notify each licensee or operating agent each time an individual is removed from the self-exclusion list. Once an individual’s name has been removed from the self-exclusion list, nothing in this rule shall prohibit a licensee or operating agent from offering:

- Marketing directly to that individual.
- Any other amenities customarily offered by Grand Central to any patron.

This section does not apply to those voluntarily excluded individuals who have elected lifetime exclusion or those individuals who have been involuntarily excluded from the premises.

Grand Central Involuntary Exclusion

At its discretion, Grand Central "...may remove a person from the sports wagering facility at such time it is determined that an individual is becoming unruly, intoxicated or impaired or otherwise detrimental to the safe and efficient conduct of sports wagering related activities."

All communication made to or by the OLG concerning an involuntary exclusion shall be entrusted to the General Manager of Grand Central.

The Security personnel on duty shall be solely responsible for the removal of any person from the facility, generating and maintaining all documentation concerning involuntary exclusions from Grand Central. Security Personnel shall notify the Head of Security and Surveillance and to monitor the incident and the person or persons being escorted from the facility.

The individual shall be removed by the Security Personnel and a report of the incident shall be recorded on Grand Central's "Incident Report" form. The Security personnel or the Head of Security and Surveillance may also notify local law enforcement and proceed with criminal trespass charges against the involuntarily excluded individual. The report shall detail the following:

- Indication of ejection or arrest (if applicable);
- Incident Number, date and time of incident, date and time of report;
- Location of incident;
- Name, including any aliases or nicknames;
- Social Security Number (if available), date of birth and address;
- Photo taken, Yes or No;
- Height, weight, hair color, and other descriptive information;
- Incident description
- Signature of patron; and
- Signature of Security Department representatives.

If obtainable, the Security personnel on duty or the Head of Security and Surveillance shall take photographs of the individual. One photograph and the "Incident Report" form shall remain on file in the Surveillance Logbook. Once an "Incident Report" form has been completed, an original copy along with a photograph shall be provided to the General Manager and finally sent to the OLG.

Reinstatement – Any individual involuntarily excluded by Grand Central, who is not also on the OLG's Self-Exclusion list, may be required to submit a request to the Grand Central's Responsible Gaming Committee to be removed from the exclusion list. The decision on whether to reinstate shall be made by the Grand Central's Responsible Gaming Committee and may also be based on information provided by the OLG. The Committee's decision shall be communicated to the OLG and the patron via letter.

Each Involuntary excluded person who has been listed on the Involuntary Exclusion List and wishes to contest being placed on the Involuntary Exclusion List may request an administrative hearing per D.C. Mun. Regs. tit. 30 § 2130.

OLG Official Involuntary Exclusion List

The OLG shall maintain the official Involuntary Exclusion List. The OLG shall notify Grand Central of any changes to the list by mailing, or emailing a notice, along with a photograph to the General Manager of Grand Central, in accordance with involuntary exclusion rules and regulations.

The form shall be date stamped immediately upon receipt, unless the form is received by email. The Head of Security and Surveillance shall update the Surveillance Logbook to permit appropriate facility personnel to review and identify an involuntarily excluded individual.

Security facility personnel shall have access to the Logbook. The Head of Security and Surveillance shall maintain the Logbook in the monitor room.

Tracking of Involuntary Exclusion

Grand Central shall ensure that those involuntary excluded individuals do not receive, any solicitations, targeted mailings, telemarketing promotions, material or other promotional materials relating to gaming activities from Grand Central.

Information furnished to or obtained by the OLG shall be deemed confidential and shall not be disclosed except to facility personnel whose duties and functions require access to the information. Grand Central and its facility personnel or agents thereof shall not disclose the name of, or any information about, any individual who has been classified as an involuntary exclusion to anyone other than facility personnel and agents of Grand Central whose duties and functions require access to such information. Notwithstanding the foregoing, Grand Central may disclose the name of and information about an involuntarily excluded individual to the OLG for the purpose of alerting another agent that an involuntarily excluded individual has been removed from the facility.

Grand Central Financial/Marketing Material Self-Limitation Programs

Financial, time and marketing material self-limitation programs are designed to allow a patron who does not want to voluntarily exclude themselves to still impose some restrictions on their own personal access to Sports wagering, as well as marketing material. The patron may specifically request to any personnel on duty at the sports wagering facility to be enrolled in such a program, to limit certain financial transactions and/or stop sports wagering to receive marketing material.

- a) **Personal Financial Restriction Program** - This option is administered by the Head of Security and Surveillance and reported in the Surveillance Logbook and promptly communicated to any facility personnel accessing the Logbook. With this option, a patron shall sign an affidavit indicating that he or she wishes to be financially restricted (i.e., up to a certain limit of spending within a period) at this sports wagering facility only. The term of the financial restriction shall last until reinstatement is requested and granted in accordance with the reinstatement procedures below. Once enrolled, the following actions shall be taken:
 - i. If Financial Restrictions are requested, the patron Logbook shall be labeled "Financially Restricted" in the Surveillance Logbook, so that any facility personnel accessing the Logbook shall know of their status and shall refuse them restricted financial services; and

- ii. If requested by the patron, the patron shall also be removed from the sports wagering facility promotional/marketing lists.
- b) **Reinstatement** – To have financial restrictions lifted, the patron must send a request to Grand Central’s Responsible Gaming Committee requesting reinstatement. The decision on whether to reinstate shall be made by the Grand Central’s Responsible Gaming Committee. The Committee’s decision shall be communicated to the patron via letter.
- c) **Marketing Material Restriction** – A patron may request that the sports wagering facility stop sending them marketing material for a variety of reasons, many of which have nothing to do with the patron’s desire or need to curtail or stop gaming. This option is administered by Grand Central General Manager.
- d) **Patrons Information, Access & Confidentiality** – Grand Central shall use a Surveillance Logbook (which may be a physical book or electronic media) as the primary means to identify excluded and voluntarily excluded persons. The Logbook Surveillance Logbook shall also be the primary means to identify excluded, financially restricted and mail restricted persons and to prevent them from completing a restricted transaction.
- e) **Confidentiality** - The identities of individuals on any exclusion, financial or marketing material restriction list are strictly confidential and may not be disclosed for any purpose other than to comply with the voluntary exclusion and financial restriction programs outlined in this document and the District of Columbia’s law. Disclosure of such names for any other purpose could result in discipline up to and including termination of employment for the individual responsible and regulatory action by the OLG. Grand Central shall control access to the names of individuals enrolled in a voluntary exclusion and/or financial restriction program through access controls to the Player Tracking System. Such controls include:
 - i. **Access Control** – Facility personnel who need access to the names of individuals on the Voluntary Exclusion and Financial Restriction List(s) shall be granted access to the Logbook Surveillance.
 - ii. **Password Control** (in case of electronic media) – Facility personnel granted such access must input a unique password to access the Surveillance Logbook.

UNDERAGE GAMBLING POLICIES & PROCEDURES

Facility personnel are advised through the Responsible Gaming Training Program of policies and procedures concerning underage gambling. Grand Central takes the issue of underage gambling very seriously and has developed policies and procedures to prevent individuals under the age of 18 (except for authorized facility personnel and accompanied minors) from accessing the facility or the gambling area:

- A. **Wagering Prohibitions** - Grand Central has established procedures to identify underage patrons in the sports wagering facility and to prevent them from entering the sports wagering facility in the first place. As such, individuals under the age of 18 may not participate in sports wagering activities or cause others to do so on their behalf, may not receive any benefits or privileges as a result of sports wagering and may not collect winnings or recover losses from a Sports wagering wager through any means. Any individual under the age of 18 who is caught gambling shall be immediately escorted from the facility
- B. **Access** – Unaccompanied individuals under the age of 18 may not enter or be in the sports wagering facility. Security personnel shall monitor all main public entrances leading to the sports

wagering facility in order to prevent access by unaccompanied underage individuals. An individual shall be carded by a security personnel at the facility if they appear to be under the age of 25. All facility personnel are responsible for ensuring that an individual under 18 years of age does not enter the facility, gamble or consume alcoholic beverages. Any facility personnel who reasonably suspects an individual may be under the age of 18 has the right and obligation to card that individual (or ask a security officer to card the individual).

- C. **Forfeiture of Winnings** - Any sports wagering winnings by an individual under the age of 18 shall be confiscated and the patron shall be ejected from the sports wagering facility.

UNATTENDED CHILDREN POLICIES & PROCEDURES

Facility personnel are advised through the Responsible Gambling Training Program of policies and procedures concerning unattended children. All facility personnel shall be on the lookout for unattended children both inside and outside of the facility. For the purposes of this policy, an unattended child shall be considered any individual who appears to be under the age of 16 and who is unaccompanied by an adult.

- A. Any facility personnel who discover an unattended child shall immediately report this to the Security personnel and, if reasonably practical, the facility personnel shall stay with the child until the intervention of the Security who shall proceed as follows:
 - a. The Security personnel shall notify the Head of Security and Surveillance and shall escort the child to the Surveillance room or another safe location. The Security personnel shall not leave the child unattended at any time.
 - b. The Security personnel shall attempt to determine the name of the child's parent(s) or guardian(s). If a name is obtained, the Security personnel and any employee on duty shall attempt to locate the parent or guardian.
 - i. Upon arrival, the parent(s) or guardian(s) shall be warned against leaving their child unattended at any time and advised of the sports wagering facility's unattended minor policy. More severe action may be taken depending on the age of the child and the incident circumstances. Such actions may include banning the parent/guardian from the facility and/or calling local Police or Child Protective Services. The child shall then be returned to the care or custody of their parent(s) or guardian(s).
 - ii. In the event the Security personnel is unable to locate the child's parent(s) or guardian(s) within 30 minutes or is unable to determine the name of the parent(s) or guardian(s) within 30 minutes, the Head of security and Surveillance shall contact an appropriate agency, such as the local Police Department or Child Protective Services.

Security may at the discretion of the Security or Supervisor on duty to remove any individual from the sports wagering facility for disruptive or unsafe actions regardless of their age. In the event that a minor is involved, then the parent or guardian shall also be removed from the facility.

RESPONSIBLE ALCOHOL SERVICE POLICIES & PROCEDURES

Facility personnel are advised through the Responsible Gaming Training Program of the policies and procedures concerning responsible alcohol service. We have established these procedures designed to discourage patrons from becoming intoxicated, to prevent serving alcohol to visibly intoxicated patrons and to prevent persons from gaming after having been determined to be visibly intoxicated. Any facility personnel who encounter a patron who appears to be visibly intoxicated shall report this information to their supervisor or a security officer. Sports wagering facility personnel have the primary responsibility for enforcing the sports wagering facility's alcohol/intoxication policies.

- A. While our patrons bear the personal responsibility to prevent themselves from consuming alcohol to the point of intoxication, we have established the following policy statements concerning alcoholic beverage service and intoxicated persons:
 - A visibly intoxicated patron shall be denied entry to the facility;
 - A visibly intoxicated patron shall not be knowingly served alcoholic beverages;
 - Sports wagering facility personnel shall make a diligent effort to not allow a visibly intoxicated patron to gamble;
 - Food & Beverage personnel shall not knowingly serve a patron alcoholic beverage to the point where the patron becomes visibly intoxicated;
 - Food & Beverage personnel shall not knowingly serve alcoholic beverages to a minor; and
 - Sports wagering facility personnel shall make a diligent effort to not allow a visibly intoxicated patron to drive a motor vehicle when leaving the facility.

- B. **Training** - The following positions (at a minimum) shall be trained in responsible alcohol service:
 - Sports wagering personnel;
 - All Security and Surveillance facility personnel;
 - All Food and Beverage facility personnel who serve alcohol (or manage those who do).

- C. Visibly intoxicated patrons shall be denied entry to the sports wagering facility by Security personnel. Security personnel shall attempt through observation to prevent intoxicated individuals from gaming and from remaining in the sports wagering facility. The procedures outlined in the Security Department section below shall be followed to ensure that the intoxicated patron does not engage in gaming activities.

- D. **Specific Responsibility for Responsible Alcohol Service** – The following departments / positions or their designees shall be responsible for matters related to responsible alcohol service as follows:
 1. **Security Personnel** - Upon visual observation or notification of any patron identified or suspected to be visibly intoxicated in the sports wagering area, the Security Personnel shall remain with the intoxicated patron until arrangements for their safe departure have been secured. The Security personnel shall make efforts to secure the patron a safe departure, such efforts may include:
 - a. Locating a sober friend or relative who may have accompanied the patron to the facility who can provide transportation;
 - b. Offering to call the patron a cab or other transportation;
 - c. Offering to call a friend or relative for the patron to take them home;

- d. The local police shall be notified immediately if the patron becomes confrontational. Any costs for cabs, lodging or other transportation shall be the responsibility of the patron.
 - e. The Security personnel shall document the incident on a Security Incident Report.
2. **Surveillance** - Upon visual observation of a patron who appears to be visibly intoxicated, the Head of Security and Surveillance when on duty shall immediately contact the Security personnel. The Surveillance personnel shall monitor the patron as necessary. The Head of Security and Surveillance shall document the incident on the Surveillance Logbook.
3. **Sports Wagering Personnel** - Upon observation of a patron who appears to be visibly intoxicated, the sports wagering facility personnel shall immediately contact the Security personnel.
4. **Food and Beverage** – Although Security facility personnel shall be asking anyone that appears to be 35 years old or under for identification, beverage servers also have the obligation to ID any individual attempting to purchase alcohol to determine if they are of legal age. Beverage servers shall not serve alcoholic beverages to a visibly intoxicated patron. A beverage server shall notify a Beverage Manager/Supervisor if a patron appears to be visibly intoxicated. The Beverage Manager/ Supervisor shall assess the condition of the patron. If the Beverage Manager/ Supervisor determines that the patron is visibly intoxicated, the sports wagering Manager and the Security personnel shall be notified, and the patron shall be removed from the sports wagering facility in accordance with the security procedures outlined above. If there is a question as to the patron’s sobriety, the Beverage Manager/Supervisor shall contact the Sport wagering Manager or the Security Manager and together they shall make the final decision.

REPORTS AND NOTIFICATION TO OLG

The Responsible Gaming Committee shall meet quarterly. Examples of the topics these meeting may include, but not be limited to:

- Responsible Gaming related policies and procedures;
- Facility personnel training sessions;
- Requests to remove self-restrictions; and
- Discussions with community leaders and/ or local support groups

Minutes of these quarterly meetings shall be maintained by the Responsible Gaming Committee. The meeting details include, but are not limited to:

- Time and date of the meeting;
- Attendees at the meeting;
- Topics discussed;
- Outcomes / action items from the meeting;
- Voluntary and Involuntary reports prepared and their content; and
- Next scheduled meeting

A OLG representative shall be notified of:

- Any individual under the age of 18 discovered gambling or found at the sports wagering facility.

- Any excluded or voluntarily excluded individual found on the premises.

On an annual basis, ELYS, in cooperation with Grand Central, shall submit to the OLG an annual report describing the operation of the Responsible Gaming Plan.

REQUIRED SIGNAGE / BROCHURES / GAMBLING HELP INFORMATION

Grand Central, in cooperation with ELYS, shall:

- a) Post signage approved by the OLG that prominently bears the gambling assistance message and the underage warning message at each customer entrance and exit of the gaming floor.
- b) Include the gambling assistance message on an advertisement that is intended to encourage play at its facility.
 - i. Ensure that a printed advertisement bears the gambling assistance message and meets requirements stated by OLG;
 - ii. Ensure that a billboard bearing a printed advertisement bears the gambling assistance message and meets requirements of OLG;
 - iii. Ensure that a television, video or radio advertisement bears the gambling assistance message and meets requirements of OLG;
- c) Ensure that the gambling assistance message is printed on the back of Players Club Cards (if any) and on any Kiosks and POS generated ticket wagers.
- d) Ensure that any advertisement, used by a gaming junket enterprise or manufacturer licensees bears the gambling assistance message.
- e) A brochure provided by the State describing the signs and symptoms that may be indicative of a gambling problem and that includes the NCPG toll-free helpline and website information shall be available at the Sportsbook Facility.

All team members shall be familiar with the brochures and know where they are located. Team members are to offer a copy of the brochure to any patron who inquiries about problem gambling issues. If a team member cannot leave his post, he should direct the patron to the location where the brochures can be found.

RELATIONSHIP WITH NCPG

The National Council on Problem Gambling (NCPG) has certified Elys Game Technology, Corp. as a Silver Organization Member since December 2020. The NCPG is widely viewed upon as the national advocate for programs and services to assist problem gamblers and their families. NCPG was founded in 1972 and is a non-partisan, non-profit organization that is neutral on legalized gambling. Their mission is to lead state and national stakeholders in the development of comprehensive policy and programs for all those affected by problem gambling. Their purpose is to serve as the national advocate for programs and services to assist people and families affected by problem gambling. Their vision is to improve health and wellness by reducing the personal, social and economic costs of problem gambling. ELYS shall continue to work closely with the NCPG and promise to be at the forefront of comprehensive policy and programs.

CONCLUSION

ELYS and Grand Central management and facility personnel are dedicated to operating a safe, enjoyable and responsible facility. While ultimate responsibility rests with our patrons for gaming responsibly and

consuming alcohol in moderation, this Responsible Gaming Plan has been developed to minimize the negative impacts of those few patrons who shall not or cannot act responsibly.