

Illinois Gambling Act (230 ILCS 10)

Date: 12/3/2021

(230 ILCS 10/5.1) Section 5.1 Disclosure of Records

(a)

Notwithstanding any applicable statutory provision to the contrary, the Board shall, on written request from any person, provide information furnished by an applicant or licensee concerning the applicant or licensee, his products, services or gambling enterprises and his business holdings, as follows:

1. The name, business address and business telephone number of any applicant or licensee.  
[DGC IL LLC – 245 N. Ocean Blvd., Suite 300, Deerfield Beach, FL 33441 – Phone#: \(954\) 363-2355](#)
2. An identification of any applicant or licensee including, if an applicant or licensee is not an individual, the names and addresses of all stockholders and directors, if the entity is a corporation; the names and addresses of all members, if the entity is a limited liability company; the names and addresses of all partners, both general and limited, if the entity is a partnership; and the names and addresses of all beneficiaries, if the entity is a trust. If an applicant or licensee has a pending registration statement filed with the Securities and Exchange Commission, only the names of those persons or entities holding interest of 5% or more must be provided.
  - [DGC IL LLC – Limited Liability Company – Applicant \(Master Sports Wagering License\)](#)
  - [Charles Bernitz – \(President\) – 245 N. Ocean Blvd., Suite 300, Deerfield Beach, FL 33441](#)
  - [Keith Furlong – Vice President - 245 N. Ocean Blvd., Suite 300, Deerfield Beach, FL 33441](#)
3. An identification of any business, including, if applicable, the state of incorporation or registration, in which an applicant or licensee or an applicant's or licensee's spouse or children has an equity interest of more than 1%. If an applicant or licensee is a corporation, partnership or other business entity, the applicant or licensee shall identify any other corporation, partnership or business entity in which it has an equity interest of 1% or more, including, if applicable, the state of incorporation or registration. This information need not be provided by a corporation, partnership or other business entity that has a pending registration statement filed with the Securities and Exchange Commission. [DGC IL LLC does not have any equity interest in Digital Gaming Corporation USA \(DGC USA\) or Digital Gaming Corporation Limited \(DGC UK\).](#)
4. Whether an applicant or licensee has been indicted, convicted, pleaded guilty or nolo contendere, or forfeited bail concerning any criminal offense under the laws of any jurisdiction, either felony or misdemeanor (except for traffic violations), including the date, the name and location of the court, arresting agency and prosecuting agency, the case number, the offense, the disposition and the location and length of incarceration. [No - N/A.](#)
5. Whether an applicant or licensee has had any license or certificate issued by a licensing authority in Illinois or any other jurisdiction denied, restricted, suspended, revoked or not renewed and a statement describing the facts and circumstances concerning the denial, restriction, suspension, revocation or non-renewal, including the licensing authority, the date each such action was taken, and the reason for each such action. [No – N/A.](#)

6. Whether an applicant or licensee has ever filed or had filed against it a proceeding in bankruptcy or has ever been involved in any formal process to adjust, defer, suspend or otherwise work out the payment of any debt including the date of filing, the name and location of the court, the case and number of the disposition. **No – N/A.**

7. Whether an applicant or licensee has filed, or been served with a complaint or other notice filed with any public body, regarding the delinquency in the payment of, or a dispute over the filings concerning the payment of, any tax required under federal, State or local law, including the amount, type of tax, the taxing agency and time periods involved. **No – N/A.**

8. A statement listing the names and titles of all public officials or officers of any unit of government, and relatives of said public officials or officers who, directly or indirectly, own any financial interest in, have any beneficial interest in, are the creditors of or hold any debt instrument issued by, or hold or have any interest in any contractual or service relationship with, an applicant or licensee. **Keith Furlong, Vice President of DGC IL LLC and (Secretary/Treasurer/Director) of DGC USA, is married to Esther Suarez (Attorney), who is the Hudson County Prosecutor in Jersey City, New Jersey. However, neither Mr. Furlong, nor his spouse, Esther Suarez, have direct or Indirect, own any financial interest in, have any beneficial interest in, are the creditors of, hold any Debt Instrument issued by or hold or have any interest in any contractual or service relationship with Applicant or any of its Key Persons.**

9. Whether an applicant or licensee has made, directly or indirectly, any political contribution, or any loans, donations or other payments, to any candidate or office holder, within 5 years from the date of filing the application, including the amount and the method of payment. **None**

10. The name and business telephone number of the counsel representing an applicant or licensee in matters before the Board.

Edward R. Winkofsky  
Greenberg Traurig LLP  
77 West Wacker Drive, Suite 3100  
Chicago, IL 60601  
(312) 456-8440

11. A description of any proposed or approved gambling operation, including the type of boat, home dock, or casino or gaming location, expected economic benefit to the community, anticipated or actual number of employees, any statement from an applicant or licensee regarding compliance with federal and State affirmative action guidelines, projected or actual admissions and projected or actual adjusted gross gaming receipts. **Yes, online sports wagering operation. For more information regarding economic benefit to the community, please see information outlined in question 39(j) in the Master Sports Wagering License application submitted.**

12. A description of the product or service to be supplied by an applicant for a supplier's license. **Please see the information outlined in the Master Sports Wagering response, specifically, section 39(f) for more detailed information.**



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**BINDING COMMITMENTS [230 ILCS 45/25-45(i)]:** Those additional commitments which shall become a condition of the license. Failure to comply with binding commitments may subject the master sports wagering licensee to discipline pursuant to the Act.

- 1. Bid Amount: Provide the amount of the Applicant's License bid. Include additional license fees, revenue share, or other financial commitments.**

From a financial perspective Applicant's bid includes:

- \$22.5 million to the Illinois Gaming Board ("IGB") being the minimum \$20 million bid that applicants must make, with a further \$2.5 million committed at the Applicant's discretion.
- A minimum of 1.5% percent of post-tax Net Gaming Revenue ("NGR") donated annually to Common Goal USA that funds projects that harness the power of sports to advance the UN Global Goals and empower disadvantaged young people and their communities.

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- 2. Non-Financial Commitments: Identify any other non-financial binding commitments being offered. This may include, but is not limited to, in-state hiring plans, in-state economic development plans, in-state supplier commitments, or affirmative action plans.**

*Diversity of Ownership*

Prior to submitting its application, the Applicant committed itself to achieving a minimum of 15% minority and/or diverse equity investment. To that end, the Applicant engaged in discussions, both directly and indirectly via liaisons, with numerous potential investors who are minority persons, women, persons with a disability, and veterans of service in the armed forces of the United States, regarding potential investment in the Applicant.

As of the filing of this application, the Applicant has obtained term sheets from four individual investors. These individuals have been vetted and will ensure that the Applicant's ownership table is consistent with the business' wider operational approach to equal opportunity and diversity. Specifically, the Applicant's structure will include 15% persons of color, which 15% includes 4.5% women and 3.5% veterans.

*Diversity of Employment and Affirmative Action*

The Applicant will, at a minimum, initially employ a state manager in Illinois. As the state grows, the Applicant will expand the team with additional in-state functions including local marketing, sponsorships, regulatory employees, key account managers, and others as needs dictate. Believing that diversity is essential to its success, the Applicant will strive to achieve and maintain a workforce that reflects the diversity of Illinois. In this context, diversity specifically focuses on differences among people with respect to age, sex, culture, race, ethnicity, religion, color, disability, national origin, ancestry, sexual orientation, and veteran status. Particular attention will be given to individuals and groups that historically have been the targets of discrimination, racism, sexism, and harassment.

*Diversity of Vendors and Other Business Associates*

The Applicant will provide equal opportunity to all individuals and entities seeking to do business with us in Illinois. Beyond this, the Applicant will proactively seek opportunities to engage with minority and diverse business entities by reaching out to organizations that represent such entities.

*Corporate Responsibility*

The Applicant understands that, during the course of the Pritzker administration, government officials have prioritized important initiatives to invest in communities impacted by the war on drugs, invest record funds to reimagine public safety, and address systemic racism.

In 2015, the United Nations (UN) adopted a set of Global Goals as a universal call to action to end poverty, protect the planet, and ensure that by 2030, all people enjoy peace and prosperity. The UN stated that these goals are integrated and "recognize[d] that action in one area will affect outcomes in others, and that development must balance social, economic and environmental sustainability."

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If licensed, the Applicant intends to partner with Common Goal to donate, throughout the term of its license, 1.5% of its post-tax NGR to projects that harness the power of sports to advance the UN Global Goals and empower disadvantaged young people and their communities. In supporting Common Goal, the Applicant will be joining a number of leading athletes, sporting organizations and sports teams, including local soccer team Chicago House AC.

While the Applicant considered making a fixed fee donation, it believes that linking the high growth potential of the business with the size of the donation to Common Goal will be more impactful over a long period of time. This is consistent with DGC's broader principles and multi-pronged focus on equal opportunity and the promotion of diversity across the business.

Just recently, Lt. Governor Stratton stated that "we have to address the root causes of violence and invest in communities and the people who deserve more resources and opportunities than they have historically been given" as it relates to an announcement regarding cannabis revenues. The Applicant's commitment to dedicate 1.5% percent of its annual post-tax NGR in perpetuity answers the call from the Pritzker administration, legislators, and community advocates, to invest in the social determinants of health and help restore, reinvest in, and renew Illinois' most deserving communities. In doing so, the Applicant can help to establish an intrinsic link between sports as a business and sports as a tool for social development, ensuring that, if granted, the Applicant's license will play a role in tackling the biggest global challenges of our time - from advancing gender equality to driving employment and growth to promoting greater peace and social justice.

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**APPLICANT SUMMARY**

- 3. Prospective Revenue: Provide the highest prospective total revenue to be derived by the State from the conduct of Sports Wagering. Submit all reports, feasibility studies or other documents to support this statement.**

The Applicant's forecasts supplied confidentially to the regulators are based on Eilers & Krejcik's February 2020 outlook on the size of the Illinois market, being \$622 million gross gaming revenue at maturity (year five post go-live). Other variables are based on the Applicant's best estimates, also supplied confidentially to the regulators, of the Applicant's potential market share.

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**4. Experience: Describe the character, reputation, and experience of the Applicant, its Key Persons, and any other person that directly or indirectly controls or is controlled by the Applicant or a Key Person or Affiliate of the Applicant.**

The Applicant

The character and reputation of the Applicant is best evidenced by the fact that its parent company, DGC USA (DGC), as well as DGC's holding company and qualifiers, have thus far received licenses or approvals to participate in B2C sports betting (plus iGaming where allowed by law) in seven US states: Arizona; Colorado; Indiana; Iowa; New Jersey; Pennsylvania; and Virginia (through a subsidiary). In addition to this, DGC USA has licenses or approvals to operate B2B services for iGaming in Michigan, Connecticut, New Jersey, and Pennsylvania, providing casino content to some of the leading operators in the industry.

Insofar as experience is concerned, DGC has since its inception offered an innovative and creative suite of first-class digital casino content. The driving force behind DGC's success has been the establishment of its iGaming product development division, formerly known as Mahi Gaming. Through its game design studios, Mahi's experienced team demonstrated the ability to develop innovative and successful online games for use in regulated markets outside the US. Another division of DGC acquired US rights to the IP for many of the most popular and successful games in the world which could be modified for the US market.

Following the Supreme Court's 2018 decision overturning a 1992 federal law that effectively banned commercial sports betting in most states, DGC found itself in a strategically and technologically ideal position to grow in the swiftly regulating online sports betting and iGaming markets in the US. On the sports betting side, DGC entered into a licensing agreement for the exclusive use of the "Betway" name within the US and established its DGC-Betway Division, which is the vehicle through which DGC has gone live or is working to go live with online sports betting in multiple US states.

DGC's brand partner, SGHC Ltd. ("Super Group") has successful licensed and regulated sports betting and gaming operations in the UK, Europe, and many other jurisdictions outside the US and will provide all necessary brand and marketing services needed to establish the strongest presence for the Applicant within Illinois (see Super Group summary below). Super Group has entered into a definitive written agreement to acquire full ownership of the Applicant's ultimate holding company, Digital Gaming Corporation Ltd. ("DGC UK"), subject to obtaining the requisite gaming regulatory approvals. This transaction is expected to close in the first half of 2022.

DGC and the DGC-Betway combination are viewed with high regard within the US gaming industry. This is demonstrated by the fact that DGC has already secured market access with well-established US casino operators (including Boyd Gaming, The Cordish Companies and Golden Nugget), and one Native American Tribe, for online sports betting and iGaming (where allowed by law) in up to an initial 12 states. Most recently, DGC was awarded a permit to operate online sports betting in Virginia in a competitive process not dissimilar to this Illinois application process.

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Key Persons of the Applicant are as follows:

*Charles Bernitz – Owner, President, and Chairman of the Board*

Charles Bernitz is the sole owner of DGC UK, the ultimate holding company of the Applicant. He is also the President and Chairman of the Board of DGC UK. Mr. Bernitz was born in South Africa and is a citizen of the UK. He has had a long and successful career introducing industry-changing technologies into a variety of manufacturing and service industries in the US, Europe, and the Far East.

Since 2000, Mr. Bernitz has been a founder of and sole investor in multiple gaming-related software development companies in the UK and US including DGC UK and its subsidiaries (together “DGC”).

*Bruce Watermeyer-International Vice President – Sports Betting Strategic Initiatives*

Bruce Watermeyer, DGC’s International Vice President of Sports Betting Strategic Initiatives, is an experienced iGaming and sports betting executive with a strong background in product marketing and business management. He is a professional with more than 22 years of diverse e-commerce start-up experience across a selection of successful global IT and e-commerce businesses, culminating in an extensive online gaming management career which has covered every aspect of the industry for the past 18 years.

Mr. Watermeyer is committed to delivery, with a proven track record of delivering excellent results in challenging environments through leadership of diverse teams and prioritization of strategic and tactical goals. His track record has shown delivery across business strategy, marketing, business development, customer retention, yield management, product management, analytics, and business intelligence.

He has spent years managing and developing teams across multiple countries, languages, and cultures, and has played a leading role in expanding operations into new regulated jurisdictions across the world.

*Adam Felman – CFO*

After receiving a joint degree in Mathematics and Business with honors, Mr. Felman qualified in 2013 as a Chartered Accountant with the Institute of Chartered Accountants in England and Wales, while at Blick Rothenberg LLP (formerly Hazlems Fenton LLP), a prestigious London accountancy firm.

Mr. Felman joined DGC in 2017 as CFO. He now has overall financial responsibility and has assisted in growing DGC’s business and managing its financial affairs. Mr. Felman also serves as a director of DGC UK.

*Charl Baard – Head of Operations (Sports Betting)*

Charl Baard has spent more than 20 years in the online gaming industry, with extensive experience in customer retention marketing, operations management, online transactional risk management, and regulatory compliance.

Prior to joining DGC, Mr. Baard worked as a risk systems administrator, responsible for research and development of one of the industry’s first real-time transactional risk management systems. This system

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offered a configurable rules engine that identified patterns of fraudulent behavior and suspicious transactions, protecting operators by allowing them to customize and streamline their risk screening processes.

Mr. Baard also served as a responsible gambling compliance officer, ensuring that responsible gambling policies were enforced. He was also responsible for ensuring compliance with anti-money laundering (AML) policies.

Super Group

Super Group is a privately held Guernsey corporation which is the holding company for leading global online sports betting and gaming businesses: Betway, a premier online sports betting brand; and Spin, a multi-brand online casino offering. Collectively, Super Group, its subsidiaries and affiliates:

- Comprise over 3,700 people across 17 offices around the globe
- Are licensed in 25 jurisdictions throughout Europe, the Americas, and Africa
- Took in more than \$44 billion in handle in the 12 months ending in June 2021
- Currently have over 2.5 million monthly unique active customers
- Are forecast to generate over \$1.5 billion of NGR in 2021, resulting in EBITDA of \$350 million

Consistent with its strategy of international expansion, and as previously mentioned, Super Group licensed the “Betway” brand to DGC for exclusive use in the US, where DGC and Super Group have been working together for more than two years. Super Group has also entered into a definitive agreement to acquire full ownership of the Applicant’s ultimate holding company, DGC UK, subject to obtaining the requisite gaming regulatory approvals. Concurrently, but independent of the acquisition of DGC UK, Super Group is combining with Sports Entertainment Acquisition Corporation (NYSE:SEAH) (“SEAH”), a publicly traded special purpose acquisition company (“SPAC”) in a transaction that values Super Group at \$4.75 billion. The transaction is expected to close in December 2021 or January 2022 and will see Super Group listed on the New York Stock Exchange.

Super Group’s approach to online sports betting is to leverage a single global sportsbook brand, Betway, across the world. The thrust of Betway’s marketing strategy is to align the brand with relevant sports teams across the globe, making use of sponsorships, television ads, and digital media, in a coordinated, multi-channel approach. Betway’s current sponsorship portfolio comprises more than 65 different partnerships spanning a range of sports and eSports across the US, Europe, Latin America, and Africa.

In the US, this includes deals with 13 major-league sports franchises including the Miami Heat, Cleveland Cavaliers, Golden State Warriors, LA Clippers, and New York Islanders, in addition to a league deal with the NHL that displayed the Betway brand on the ice during the Stanley Cup Playoffs. Most recently, Betway has also announced sponsorship agreements with the Dallas Mavericks, Philadelphia 76ers, and Minnesota Timberwolves.

Of particular significance in Illinois is Betway’s five-year partnership with the Chicago Bulls which runs through the 2024-25 NBA season and under which Betway becomes an “Official Sports Betting Partner” of the franchise. Within that partnership, Betway receives TV-visible branding, social media, and digital assets, as well as hospitality assets that include tickets, VIP experiences, and exclusive memorabilia.

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While this deal is important for Illinois, it also forms part of a broader global strategy to have Betway's brand recognized and strengthened through partnerships with franchises playing in leagues that are highly popular around the world.

Super Group is actively looking at more deals of this nature, with some already in advanced stages of negotiation. These deals will be complemented by localized sponsorships and digital spend in Illinois, as the Applicant endeavors not only to gain market share but also to grow the entire sports betting industry in the state.

Super Group holds licenses in 25 jurisdictions around the world outside the US. While it is a truly global business, Super Group is made up of numerous local offerings which have been tailored over a number of years to meet specific customer appetites in these different markets. In the same way that each country is treated separately, Super Group understands that each US state is different, so that for the brand to be successful, it is necessary to build for each market a tailored strategy and approach that will resonate with the local target consumers and deliver long-term profitable growth.

From a technology perspective, Super Group uses a unique hybrid model, whereby its own proprietary technology is seamlessly integrated with the technology of select leading providers, to enable Super Group to optimize speed-to-market and accelerate the growth of the Group's existing global footprint. Irrespective of the technology stack used, Super Group plugs in its own proprietary data and analytics engine, which provides it with a holistic view of its customers. Through data-modelling and real-time events processing, this enables the business to make the right decisions, at the right time, in the right market. As a business focused on its customers and the unique value proposition offered to them, using data to drive a highly personalised and customised entertainment offering in a safe and secure environment is key to Super Group's ongoing engagement with its customers.

Additionally, using information processed via Super Group's leading proprietary behavioral data analytics engine, the team are able to leverage this data in real-time to fine-tune products, communications, marketing messaging, and responsible gaming interventions, to shape the customer journey, delivering a truly customized and personalized offering to each and every customer, in a safe environment. We believe this feature is industry-leading, having been developed over two decades, and has been the key to the success of the Betway brand around the world.

Key Persons of Super Group are as follows:

Neal Menashe – CEO

As CEO of Super Group, Neal Menashe leads the development and execution of Super Group's strategy and growth. In driving the company forward, Mr. Menashe draws upon more than two decades' experience in the online gaming industry, which he has helped to shape.

In 2001, Mr. Menashe co-founded Win Technologies, a leader in online marketing support, customer relationship management, and technological solutions, which was acquired by the Betway Group in 2011. Over his extended tenure, Mr. Menashe has developed a deeply embedded understanding of product and customers.

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After qualifying as a chartered accountant at Arthur Andersen in 1998, Mr. Menashe started his journey in the online world and has never looked back.

*Richard Hasson – President and COO*

Richard Hasson is a highly experienced leader in the betting and gaming industry who has played a key role in supporting Super Group's global expansion.

A chartered accountant and corporate financier by background, Mr. Hasson joined Win Technologies in 2012 after successful periods at KPMG, Goldman Sachs, and Prodigy Finance. Mr. Hasson's experience includes corporate development, strategy, commercial, and partnerships in new markets, bringing his industry-leading direction to Super Group's acclaimed online sports betting and gaming brands.

*Alinda van Wyk – CFO*

Alinda van Wyk qualified as an accountant in South Africa and has more than 20 years' experience in senior financial positions within the online gaming industry. She is responsible for the financial affairs and stewardship of Super Group, including its reporting and structured financial systems that enable the company to seamlessly integrate all its business activities.

Working closely with the business at all levels, Ms. van Wyk plays a crucial role in advising on the Group's strategic direction and ensures that the company's finances are fully aligned with its wider commercial activities.

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- 5. Diversity: Unless already part of a binding commitment described above, provide a detailed explanation of the extent to which the ownership of the Applicant reflects the diversity of the State by including minority persons, women, persons with a disability, and veterans of service in the Armed Forces of the United States.**

The Applicant realizes that business and corporate culture are intertwined. Diversity starts with the owners' and senior management's commitment to equal opportunity in all facets of operations, as reflected in the Company's leadership team. To that end, the Applicant has been committed to starting with a diverse ownership team, with the belief that this structure is essential to establishing the culture and image of the organization, both internally and externally.

As mentioned above, prior to submitting its application, the Applicant committed itself to achieving a minimum of 15% minority and/or diverse equity investment. Toward that end, the Applicant engaged in discussions, both directly and indirectly via liaisons, with numerous potential investors who are minority persons, women, persons with a disability, and veterans of service in the armed forces of the United States, regarding potential investment in the Applicant.

As of the filing of this application, the Applicant has obtained term sheets from four individual investors. These individuals have been vetted, and will ensure that, if granted a license, the Applicant will reflect diversity where it matters most – at the ownership table. Specifically, the Applicant's founding structure will include 15% persons of color, which 15% includes 4.5% women and 3.5% veterans.

These four prospective minority owners have extensive experience in highly regulated industries, have been champions for diversity in their respective fields, and have tangible connections to communities that have suffered from disinvestment. We have confidence that, as owners and Illinois residents, they will ensure that our team remain good stewards of an Illinois license if granted.

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- 6. Affirmative Action Plan: Unless already part of a binding commitment described above, provide a detailed explanation of the Applicant's commitment to diversity in the workplace, including the Applicant's good faith affirmative action plan to recruit, train and upgrade minority persons, women, persons with a disability, and veterans of service in the Armed Forces of the United States in all employment classifications.**

The Applicant is committed to a diverse workforce, providing equal employment opportunity to all prospective and actual employees at all levels. The Applicant's efforts will include advertising and networking, recruiting, mentoring, training, and staff development, with particular focus on minorities and other diverse groups.

Both DGC and Super Group also provide equal opportunity to all individuals and entities seeking to do business with them in all jurisdictions in which they currently operate, and the Applicant will do the same in Illinois. The Applicant will proactively seek opportunities to engage with minority and diverse business entities by reaching out to organizations that represent such entities.

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**7. Financing: Describe the expected capitalization of the Sports Wagering Operation, including the source(s) and amounts of debt financing and equity financing to be employed to obtain and operate the License. Please include letters from third parties affirming their role and level of interest in providing potential financing.**

The Applicant's initial capitalization will be sourced via direct capital contributions from its members. Subsequent funding will be in the form of debt financing provided by the managing member and parent entity, DGC. Further information has been provided confidentially to the IGB.

As mentioned, DGC is currently in the process of being acquired by Super Group, a leading global sports betting and gaming business. Super Group has entered into a binding, definitive agreement to acquire DGC, subject to regulatory approvals and other customary closing conditions. Upon closing, which is expected to be during the first half of 2022, DGC will become a part of Super Group.

Concurrently, but independent of the acquisition of DGC, Super Group is combining with Sports Entertainment Acquisition Corporation (NYSE:SEAH) ("SEAH"), a publicly traded special purpose acquisition company ("SPAC") in a transaction that values Super Group at \$4.75 billion. This transaction is expected to close in December 2021 or January 2022 and will see Super Group listed on the New York Stock Exchange.

Super Group is a debt-free, highly profitable global sports betting and gaming business which is expected to deliver Net Gaming Revenue ("NGR") of more than \$1.5 billion and EBITDA of \$350 million in 2021. Upon completion of the combination with SEAH, Super Group will be listed on the New York Stock Exchange which will provide the business with access to the public capital markets, providing an alternative source of funds to further finance the execution of its global expansion plans.

Please refer to the below links for further information on Super Group's financial position:

Link 1 – [Super Group's Investor Presentations](#)

Link 2 – [Super Group's announcement of the SPAC transaction](#)

Link 3 – [Super Group's Registration Statement on Form F-4 to the U.S. Securities and Exchange Commission with respect to the proposed business combination](#)

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- 8. Other Factors for Consideration: Please summarize any other facts or circumstances that the Board should consider in evaluating your Application. The Board may give favorable consideration to qualified applicants presenting plans that provide for economic development and community engagement.**

A safe and responsible gaming environment for all DGC's and Super Group's customers is the cornerstone of their global sports betting and iGaming organizations. If its bid is accepted in Illinois, the Applicant will be applying this same philosophy of a safe, responsible, fair, and transparent gaming environment to its Illinois operations.

To keep abreast of evolving best practices in responsible gambling, DGC is a member of the following oversight organizations:

- National Council on Problem Gambling (NCPG): <https://www.ncpgambling.org/>.
- iDevelopment and Economic Association (iDEA): <https://ideagrowth.org/online-gaming/>.
- US Integrity (USI): [www.usintegrity.com/](http://www.usintegrity.com/)

Additionally, Betway is a member of the American Gaming Association (AGA) Sports Betting Task Force.

DGC has also partnered with an industry-leading company that will provide, among other things, responsible gambling awareness training courses to ensure that DGC's staff remain up to date on the latest skills and compliance knowledge. Safer gambling is at the core of what Super Group, and thus Betway, does, and all customers have access to comprehensive information about how to gamble responsibly.

DGC's responsible gambling policies are fully applicable to the Applicant and all brands operating under any of DGC's licenses and to all third-party companies that provide services to DGC's affiliated entities.