

# Guidance for Completion of the Industry Performance Return

Malta Gaming Authority



## Contents

1	Introd	luction	5
2	Guide	elines on Required Data - Remote Channel	5
	2.1 IF	PR for B2C - Gaming Service Licence holders	5
	2.1.1	Customer Accounts	5
	2.1.2	Suspicious Betting	9
	2.1.3	Responsible Gambling	12
	2.1.4	Financial Info - Section A	14
	2.1.5	Financial Info - Section B	15
	2.1.6	Employment – Section A	15
	2.1.7	Employment – Section B	16
	2.1.8	Outsourcing	18
	2.1.9	Business Trends	19
	2.1.10	Skills Gap	19
	2.1.11	Additional Notes	20
	2.2 IF	PR for B2B - Critical Gaming Supply Licence ho	lders20
	2.2.1	Customer Accounts	20
	2.2.2	Suspicious Betting	20
	2.2.3	Responsible Gambling	22
	2.2.4	Financial Info – Section A	23
	2.2.5	Financial Info – Section B	23
	2.2.6	Employment – Section A	23
	2.2.7	Employment – Section B	24
	2.2.8	Outsourcing	26
	2.2.9	Business Trends	27
	2.2.10	Skills Gap	27
	2.2.11	Additional Notes	28
	2.3 IF	PR for B2C & B2B - Gaming Service Licence an	d Critical Gaming Supply Licence holders29
-	2.3.1	Customer Accounts	29
	2.3.2	Suspicious Betting	32
	2.3.3	Responsible Gambling	35



	2.3.4	Financial Info - Section A	37
	2.3.5	Financial Info - Section B	39
	2.3.6	Employment – Section A	39
	2.3.7	Employment – Section B	40
	2.3.8	Outsourcing	41
	2.3.9	Business Trends	42
	2.3.10	Skills Gap	43
	2.3.11	Additional Notes	43
3	Guide	elines on Required Data - Land-based Channel	44
	3.1 IF	PR for B2C - Gaming Service Licence holders	44
	3.1.1	Players' Visits	44
	3.1.2	Suspicious Betting	45
	3.1.3	Tables & Gaming Devices	48
	3.1.4	Financial Information	49
	3.1.5	Employment	50
	3.1.6	Outsourcing	51
	3.1.7	Business Trends	52
	3.1.8	Additional Notes	52
	3.2 IF	PR for B2B - Gaming Service Licence holders	53
	3.2.1	Players' Visits	53
	3.2.2	Suspicious Betting	53
	3.2.3	Tables & Gaming Devices	55
	3.2.4	Financial Information	56
	3.2.5	Employment	56
	3.2.6	Outsourcing	57
	3.2.7	Business Trends	58
	3.2.8	Additional Notes	58
	3.3 IF	PR for B2C & B2B - Gaming Service Licence and Crit	ical Gaming Supply Licence holders59
	3.3.1	Players' Visits	59
	3.3.2	Suspicious Betting	60
	3.3.3	Tables & Gaming Devices	63



	3.3.	3.4 Financial Information	6	34
	3.3.	3.5 Employment	6	35
	3.3.	3.6 Outsourcing	6	6
	3.3.	3.7 Business Trends	6	37
	3.3.	3.8 Additional Notes	6	37
4	Fre	equently Asked Questions (FAQs)	6	8
	4.1	When are the IPRs due?	6	8
	4.2	How do I submit the IPR?	6	8
	4.3	Do I have to complete the IPR?	6	8
	4.4	Am I required to fill in a separate form for eac	th licence type held with the MGA?6	8
	4.5 under	If I am a Corporate Licence holder, do I need to the group?	to fill in a separate form for each company fallir	_
	4.6	I am having trouble with filling in or submitting	g the IPR, who should I contact?6	8
	4.7	Am I required to send a copy of the original R	eturn by post?6	39
	4.8	Will I receive a confirmation of my submission	n from the MGA?6	39
	4.9 IPR?	, , ,	period under review. Do I still need to submit th	ne
	4.10	We did not have any revenue during the period 69	od under review. Do I still need to submit the IPF	₹?
	4.11	Our company is in the termination process. D	o I still need to submit the IPR?6	39
	4.12	The company is in the application stage / has	not gone live yet. Do I need to submit IPR?6	39
	4.13 be au	Since our business cycle differs from the time udited. How should we report our numbers?	e frame of the IPR, our financial information will no	
	4.14	How does the MGA use the information collec	cted through the IPR?	71
	4.15	I am unable to provide the MGA with all the in	nformation requested. What should I do?	71



#### 1 Introduction

This document provides guidelines to gaming operators on the submission of the Industry Performance Return (IPR/Return). Following the enactment of the new Gaming Act, the IPRs were reviewed and updated to reflect changes in legislation. Furthermore, informal feedback received from operators was taken into account which helped in fine-tuning the definitions and overall requirements.

This document consists of the following sections:

- Guidelines on clarifying the required data for the licensees, operating in the online and landbased channels, in possession of:
  - Business-to-Consumer (B2C) Gaming Service Licence; and/or
  - o Business-to-Business (B2B) Critical Gaming Supply Licence.
- Frequently Asked Questions (FAQs)

### 2 Guidelines on Required Data - Remote Channel

#### 2.1 IPR for B2C - Gaming Service Licence holders

The following section aims to provide the necessary supporting information on how to fill each request for data which is set out in the IPRs.

#### 2.1.1 Customer Accounts

1. Number of **all unique registered accounts** <u>as at the end</u> of reporting period (30 June or 31 December) per company licensed by the MGA.

In this question, the data provided should represent the total number of unique registered accounts (irrespective of their status, be it, active, suspended, inactive etc.) under the Maltese gaming licence as at the end of June or the end of December for the year under review.

The word unique implies that any accounts that may exist across multiple brands and/or websites are not to be counted more than once.

2. Number of **new registered accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

This question requires the number of player accounts that were registered during the reporting period (1 January - 30 June or 1 July - 31 December).

Public Page 5 of 72



3. Number of **active player accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

The data submitted in this question should reflect the total number of active player accounts for the MGA licensed activity, defined as:

those accounts for customers that played at least once during the specified reporting period.

It is accepted that there might be an overlap of players which were active in both reporting periods (1 January - 30 June <u>and</u> 1 July - 31 December). To this end, when the IPR refers to the reporting period 1 July - 31 December, the following question applies:

3.1 Number of **unique active player accounts** <u>during the year</u> (1 January - 31 December) per company licensed by the MGA.

The intention of this question is to capture the <u>unique and distinctive</u> number of active player accounts <u>during the entire year</u> that should not include any double counting of accounts.

4. Number of **new active player accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

The data provided for this question should reflect the total number of <u>new</u> active player accounts under the MGA licensed activity, defined as:

those accounts on which customers played <u>for the first time</u> during their lifetime with the company licensed by the MGA during the specified reporting period.

5. Number of **suspended player accounts** during the reporting period (1 January – 30 June or 1 July – 31 December) per company licensed by the MGA.

The number of suspended player accounts refers to the total number of <u>active accounts that have been suspended/blocked by the operator</u>, for any reason, during the specified reporting period. This should exclude accounts that were suspended due to self-exclusion.

6. In actual terms, indicate the **age distribution of the active players** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

Question 6 requires the age distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

7. In actual terms, indicate the **gender of the active players** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

This question requires the gender distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

Public Page 6 of 72



In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under the header "not specified", please report all players that did not indicate their gender upon registration. This field can also be used by the licensees who did not collect information on gender. In such a case, a note in the Additional Notes section should be included.

8. In actual terms, indicate the distribution of the active players based on the amount of money wagered during the reporting period (1 January - 30 June / 1 July - 31 December) per company licensed by the MGA.

This question requires the active customer distribution in actual terms, according to the money wagered by players, based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

9. Does the company offer a mobile application to its players?

This question requires a yes or no answer as to whether the licensee offers games to its players via a mobile application.

10. In monetary terms, indicate the **methods of payment for both deposits and withdrawals** used during the reporting period (1 January - 30 June or 1 July - 31 December).

This question requires in actual monetary terms (€), the methods of payment, for both deposits and withdrawals, broken down by the various methods provided, namely:

- Credit/debit cards
- Pre-paid vouchers
- Pre-paid debit cards
- E-wallet
- Online money remittance services
- Bank transfer
- Mobile Payment services (incl. by telecoms providers)
- Cash
- Virtual Financial Assets
- Other\*

Public Page **7** of **72** 

<sup>\*</sup>When the category of "Other" is filled in, a description of such method should be provided in the relevant field.



11. Kindly list the exchange used to transfer VFA to and from fiat currency.

In this question, information on the exchange used to transfer VFA to and from fiat currency is required.

12. Do you hold other gaming licences apart for the one offered by the MGA, under the same company?

This question requires a yes or no answer as to whether the licensee holds any gaming licence apart from that granted by the MGA.

12.1 Indicate the jurisdiction(s) under which the company is licensed.

The above information must be added for <u>each country</u> by clicking on the red button "Add Country".



Country 🕇

The following set of questions aims at capturing information on betting shops that are operated by the companies licensed by MGA **by country** during the six-month period under review.

13. Do you operate **betting shops** to provide services to customers?

Question 13 requires information on whether the licensee operates any betting shops.

13.1 Indicate the following information on betting shops per country: (a) **country** where the betting shops are located; (b) **total number of betting shops**; (c) total number of **unique** registered customers as at the end of the reporting period; (d) total **number of new registered customers**; (e) total number of **active** customers during the reporting period; (f) total **Money Wagers**; (g) total **Gaming Revenue**.

In the case where betting shops are operated, the following information must be provided in Question 13.1:

- Country where the betting shops are located;
- Total number of betting shops;
- Total number of unique registered customers as at the end of the reporting period;
- Total number of new registered customers;
- Total number of active customers;
- Total Money Wagers;
- Total Gaming Revenue.

The above information must be added for <u>each country</u> separately by clicking on the red button "Add Betting Shop".

Public Page 8 of 72



Add Betting Shop

ountry Betting Sho

Unique Registered Customer

ew Registered Customers

No. Active Customers

Money Wagers (€

Gaming Revenue (€

#### 2.1.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of "suspicious betting" can vary among companies. To this end, an activity may be considered to be "suspicious" when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term "unusual activity" may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- · Significant price movements;
- · Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (eg. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously.
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

#### 1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

Public Page 9 of 72



3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January - 30 June or 1 July - 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent four questions should be answered.

3.1. Indicate the following information on suspicious betting events: (a) which **type of sports** pertain to suspicious betting events; (b) how many **instances relating to suspicious betting** were noted per sport, during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the operator shall provide the following information (a) which type of sports pertain to suspicious betting events and (b) how many instances relating to suspicious betting were noted per sport.

The above information must be added for <u>each event</u> separately by clicking on the red button "Add Event". The type of sport is to be selected from the list provided.



Type of Sport

Instances of Suspicious Betting

3.2. From the total events noted in Q3.1, indicate how many suspicious betting events linked with sports integrity were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

In Question 3.2 the operator is requested to indicate how many of the suspicious betting events listed in Question 3.1 were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

3.3. How many **player accounts** linked with suspicious betting were noted during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3.3 required the licensee to provide how many player accounts were noted to be linked with suspicious betting during the respective reporting period, (1 January - 30 June or 1 July - 31 December).

Public Page 10 of 72



3.4. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January - 30 June or 1 July - 31 December)?

In Question 3.4 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period, (1 January – 30 June or 1 July – 31 December).

4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January - 30 June / 1 July - 31 December)?

- If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
- If the licensee did offer any betting on sports events held in Malta, then an additional set of
  questions have to be answered.

4.1. Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) the number of **markets**, (b) the total **Real Money Wagers**, (c) the total **Winnings**, (d) the percentage share of **Real Money Wagers** out of total business, (e) the percentage share of **Gaming Revenue** out of total business, and (f) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport
- Number of markets offered
- Total real money wagers
- Total winnings
- Percentage of real money wagers out of total business
- Percentage of gaming revenue out of total business
- Percentage share of real money wagers for live events, and for pre-events (separately)

The above information must be added for <u>each type of sport</u> separately by clicking on the red button "Add Sport".

Add Sport

Gaming Revenue Real Money Real Money

No. of Markets
Real Money Wagers out out of Total Wagers on live Wagers on pre
Type of Sport Offered Real Money Wagers (€) Winnings (€) of Total Business (%) Business (%) events (%) events (%)

Public Page 11 of 72



#### 2.1.3 Responsible Gambling

This section aims to provide further insights to the MGA on the responsible gambling tools implemented by the operators. This will assist the Authority to further consolidate its knowledge on the subject and impact of gambling and ensure the regulation is updated accordingly in the area.

1. Number of self-exclusion requests (sign-ups) by player.

The data provided in this question should reflect the number of <u>self-exclusion requests made by players</u> within the reporting period, categorised by age and duration (definite/indefinite).

The data provided under "definite" must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

2. Number of exclusions imposed by the B2C licensee.

The data provided in this question should reflect the number of <u>self-exclusion requests imposed by the licensee</u> within the reporting period, categorised by age and duration (definite/indefinite). It is important to note that the exclusions imposed by the B2C licensee refer **solely** to exclusions that relate to Responsible Gambling and exclude any other exclusions imposed for other reasons, such as AML issues.

The data provided under "definite" must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

3. In actual terms, indicate the number of players who communicated to the operator that they were suffering from gambling addiction problems during the reporting period (1 January - 30 June or 1 July - 31 December):

This will require the operator to specify the number of players who have communicated to the operator that they were suffering from issues related to gambling addiction. In the case that the licensee does not have this information at their disposal, the field may be reported as 'N/A'.

- 4. Does your company offer **self-exclusion reversals/cancellations** (excluding removals upon expiry) on player's request?
- 4.1 Indicate the **number of requests, made by players, for self-exclusion reversals/cancellations** during the reporting period (1 January 30 June or 1 July 31 December).

Question 4 starts with a leading question in order to establish whether the company offers self-exclusion reversals on player's request. Such requests refer to cancellations of self-exclusions which are solely by the relevant player and exclude those requests which are upon expiry of the set duration.

If the company offers such reversals, Question 4.1 should be filled in and provide for the number of requests, made by players, for self-exclusion reversals during the reporting period (1 January - 30 June or 1 July - 31 December).

Public Page 12 of 72



5. Does your company offer the possibility to reduce self-exclusion period?

Question 5 requires the operator to indicate if the company offers players the possibility of reducing the self-exclusion period.

- 6. Does your company offer the possibility to set deposit limits?
- 6.1 Indicate the **unique number of players** that **set a deposit limit** on their account and the **unique number of players** that **hit this deposit limit** during the reporting period (1 January 30 June or 1 July 31 December).

Question 6 requires the operator to indicate whether it allows players to set a personal deposit limit (the amount of money or money's worth the player can deposit is limited for a period of time).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 6.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

- 7. Does your company offer the possibility to set wagering limits?
- 7.1 Indicate the **unique number of players** that **set a wagering limit** on their account and the **unique number of players** that **hit this wagering limit** during the reporting period (1 January 30 June or 1 July 31 December)

Question 7 requires the operator to indicate whether it allows players to set a wagering limit (the amount of money or money's worth the player can wager is limited for a period of time).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 7.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

- 8. Does your company offer the possibility to set loss limits?
- 8.1 Indicate the **unique number of players** that **set a loss limit** on their account and the **unique number of players** that **hit this loss limit** during the reporting period (1 January 30 June or 1 July 31 December).

Question 8 requires the operator to indicate whether it allows players to set a loss limit (the amount of money or money's worth that can be lost by the player is limited for a period of time).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 8.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

Public Page 13 of 72



- 9. Does your company offer the possibility to set time/session limits?
- 9.1 Indicate the unique number of players that set a time/session limit on their account and the unique number of players that hit this time/session limit during the reporting period (1 January 30 June or 1 July 31 December).

Question 9 requires the operator to indicate whether it allows players to set a time/session limit, (the amount of time which a player spends playing is limited).

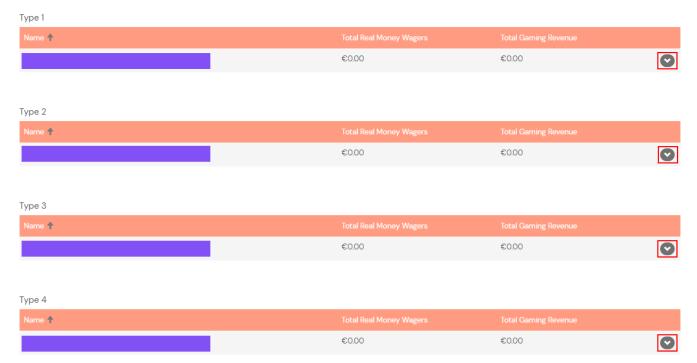
In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 9.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

#### 2.1.4 Financial Info - Section A

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the <u>Gaming Licence Fees Regulations</u> and the <u>Directive on the Calculation of Compliance Contribution</u>.

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields circled in red in the below screenshot, the list of verticals will appear on the screen.



Public Page 14 of 72



It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

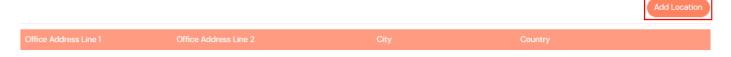


In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports an explanation should be provided in Question 1.1.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the <u>sole location</u> where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".



#### 2.1.5 Financial Info - Section B

This section aims at capturing the GR generated through the activities licensed by MGA, as defined by the <u>Gaming Licence Fees Regulations</u> and the <u>Directive on the Calculation of Compliance Contribution</u> **by country** during the six-month period under review.

1. Provide the breakdown of the **Gaming Revenue** generated solely through the MGA licences **by country** during the reporting period (1 January – 30 June or 1 July – 31 December).

The GR for <u>each country</u> needs to be added through the field provided separately. Ultimately, the total GR in both Section A and Section B of the Financial Info should tally.

#### 2.1.6 Employment – Section A

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. <u>Data provided should not include persons not employed in relation to the licensed activity</u>.

Public Page 15 of 72



1. Number of employees **working solely in Malta** on the **remote gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a work-week, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".
- 2. Out of the total number of non-Maltese employees, indicate how many are non-EU nationals?

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1 (Employment - Section A), are non-EU nationals, if any. In case there were not any, this question will not appear on your screen.

- 3. Do you operate through a physical office in Malta?
  - If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
  - If the licensee operated through a physical office in Malta, it can proceed to the next question.

3.1. Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for <u>each office</u>, the size in square meters of the office space together with the corresponding locality. The above information must be added for <u>each office</u> separately by clicking on the red button "Add Office Space".



Square Meter

Locality

#### 2.1.7 Employment – Section B

This section has been tweaked to capture <u>any additional staff in Malta</u> which is employed by the company and that does not work on the MGA licensed activities. To this end the summation of Section A and Section B should reflect the total employment of the company in Malta.

Public Page 16 of 72



Such typical other staff reported in Section B should include:

- (1) Additional employees engaged with the licensed entity working in Malta on the activities <u>not licensed</u> by the MGA; and/or
- (2) Employees that are employed with another associated/related company that is not licensed by the MGA (employees do not necessarily need to be on the payroll of the licensed entity).

For the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

1. In addition to employees working in Malta on the remote gaming activities licensed by the MGA (as reported in the Employment – Section A), does your company employ any other staff in Malta who do not work on the remote gaming activities licensed by the MGA?

In Question 1, the operator should indicate if such employment exists.

If there is no such employment, the operator can indicate a 'No' and proceed to the next section. However, if such employment exists then Question 1.1 and 1.2 should be filled in.

- 1.1 List down **all the entities** through which your company employs any other persons in Malta that were not reported in the Employment Section A.
- 1.2 Provide the aggregate number of **employees working with the entities** listed in Q1.1 as at the end of reporting period (30 June or 31 December).

In Question 1.1, the operator should provide a list of all the entities with which the other staff is employed.

In Question 1.2, the aggregate number of employees working with such entities should be reported. Such employment refers to (1) additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees do not necessarily need to be on the payroll of the licensed entity).

Again, for the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

In similarity with Section A, the data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management).

Public Page 17 of 72



2. Out of the total number of non-Maltese employees, indicate how many are non-EU nationals.

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1.2 (Employment - Section B), are non-EU nationals, if any. In case there weren't any, this question will not appear on your screen.

#### 2.1.8 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the <u>Policy on Outsourcing by Authorised Persons</u>, where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if the company had any arrangements of this kind during the said reporting period. If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section. If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based** in Malta?

1.2 Which of the following services, functions and/or processes were outsourced to **companies** based abroad?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and, or managing player funds
- Internal Audit

Public Page 18 of 72



- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game

#### 2.1.9 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year for Gaming Revenue and Employment.

It should be noted that this Section is only applicable for the reporting period 1 July - 31 December.

#### 2.1.10 Skills Gap

In order to obtain a better understanding of the existing skills gap in the gaming industry, the MGA is collecting data on a six-monthly basis which is then aggregated and presented in a report which is published on an annual basis. To access the latest report, please refer to the <u>Publication page</u> on the MGA's website.

This section includes a set of questions which should be answered specifically to the licensee's opinion about the Maltese gaming employment market.

In the case where the licensee <u>did not have</u> any vacancies in Malta as at the end of the reporting period, questions 2 and 2.1 should be answered as zero.

In terms of questions 2, 3 and 3.1, the below is a non-exhaustive list of the typical job roles included within the categories listed:

- Game operation and development: Head of Poker, Poker Manager, Casino Coordinator, Casino Campaign Manager, Mobile Product Manager, Head of Sportsbook, Sportsbook Manager/Product Development, Odds Compiler Specialist, Senior Bookmaker, Senior Trader.
- **Data and analysis:** Head of Analytics, Analytics Manager, Business Data Analyst, Data Warehouse Architect, Head of BI, BI developer.
- Marketing (incl. Customer Care): CRM Manager, Head of Brand, Digital Marketing Manager, Head
  of Affiliates, Head of SEO, Chief Commercial Officer, Head of Customer Care, Sportsbook
  Marketing Manager, Digital Content Manager, Copywriter, Social Media analyst, Graphic Designer.
- Legal and compliance, risk and fraud: Legal Compliance Manager, Legal Counsel, Chief Risk Officer, Fraud Manager, Fraud Analyst.
- **Technology**: Senior Software Developer, Front-end Developer, Back-end Developer, Web Developer, Web UX/UI Designer, Senior QA-Engineer, Platform Engineer, Software Engineer.
- **Finance, payment and human resources**: Chief Financial Officer, Payments and Reconciliation Analyst, HR Manager, Recruiter, Trainer.

Public Page 19 of 72



#### 2.1.11 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

#### 2.2 IPR for B2B - Critical Gaming Supply Licence holders

#### 2.2.1 Customer Accounts

This section <u>only applies</u> to B2C – Gaming Service licence holders. It <u>does not apply</u> to B2B – Critical Gaming Supply licence holders. Please move to the next section.

#### 2.2.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of "suspicious betting" can vary among companies. To this end, an activity may be considered to be "suspicious" when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term "unusual activity" may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- · Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (eg. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously.
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

#### 1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

Public Page 20 of 72



2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January - 30 June or 1 July - 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent four questions should be answered.

3.1. Indicate the following information on suspicious betting events: (a) which **type of sports** pertain to suspicious betting events; (b) how many **instances relating to suspicious betting** were noted per sport, during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the operator shall provide the following information (a) which type of sports pertain to suspicious betting events and (b) how many instances relating to suspicious betting were noted per sport.

The above information must be added for <u>each event</u> separately by clicking on the red button "Add Event". The type of sport is to be selected from the list provided.

Add Event

ype of Sport

nstances of Suspicious Betting

3.2. From the total events noted in Q3.1, indicate how many suspicious betting events linked with sports integrity were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

In Question 3.2 the operator is requested to indicate how many of the suspicious betting events listed in Question 3.1 were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

Question 3.3 is not applicable to this scenario.

3.4. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

Public Page 21 of 72



In Question 3.4 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period, (1 January – 30 June or 1 July – 31 December).

- 4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January 30 June / 1 July 31 December)?
  - If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
  - If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1. Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) the number of **markets**, (b) the total **Real Money Wagers**, (c) the total **Winnings**, (d) the percentage share of **Real Money Wagers** out of total business, (e) the percentage share of **Gaming Revenue** out of total business, and (f) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport
- Number of markets offered
- Total real money wagers
- Total winnings
- Percentage of real money wagers out of total business
- Percentage of gaming revenue out of total business
- Percentage share of real money wagers for live events, and for pre-events (separately)

The above information must be added for <u>each type of sport</u> separately by clicking on the red button "Add Sport".



Gaming Revenue Real Money Real Money

No. of Markets Real Money Wagers out out of Total Wagers on live Wagers on pre
Type of Sport Offered Real Money Wagers (€) Winnings (€) of Total Business (%) Business (%) events (%) events (%)

#### 2.2.3 Responsible Gambling

This section <u>only applies</u> to B2C – Gaming Service licence holders. It <u>does not apply</u> to B2B – Critical Gaming Supply licence holders. Please move to the next section.

Public Page 22 of 72



#### 2.2.4 Financial Info – Section A

1. For solely the activity generated through the MGA B2B licence, on the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the <u>Gaming Licence Fees Regulations</u>, where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act.

Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the <u>sole location</u> where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".



City Country

#### 2.2.5 Financial Info – Section B

This section <u>only applies</u> to B2C – Gaming Service licence holders. It <u>does not apply</u> to B2B – Critical Gaming Supply licence holders. Please move to the next section.

#### 2.2.6 Employment - Section A

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. Data provided should not include persons not employed in relation to the licensed activity.

Public Page 23 of 72



1. Number of employees **working solely in Malta** on the **remote gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a work-week, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".
- 2. Out of the total number of non-Maltese employees, indicate how many are non-EU nationals?

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1 (Employment - Section A), are non-EU nationals, if any. In case there were not any, this question will not appear on your screen.

- 3. Do you operate through a **physical office** in Malta?
  - If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
  - If the licensee operated through a physical office in Malta, it can proceed to the next question.
- 3.1. Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for <u>each office</u>, the size in square meters of the office space together with the corresponding locality. The above information must be added for <u>each office</u> separately by clicking on the red button "Add Office Space".



Square Meters

Locality

#### 2.2.7 Employment – Section B

This section has been tweaked to capture <u>any additional staff in Malta</u> which is employed by the company and that does not work on the MGA licensed activities. To this end the summation of Section A and Section B should reflect the total employment of the company in Malta.

Such typical other staff reported in Section B should include:

Public Page 24 of 72



- (1) additional employees engaged with the licensed entity working in Malta on the activities <u>not licensed</u> by the MGA; and/or
- (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees do not necessarily need to be on the payroll of the licensed entity).

For the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

In Question 1, the operator should indicate if such employment exists.

1. In addition to employees working in Malta on the remote gaming activities licensed by the MGA (as reported in the Employment – Section A), does your company employ any other staff in Malta who do not work on the remote gaming activities licensed by the MGA?

If there is no such employment, the operator can indicate a 'No' and proceed to the next section. However, if such employment exists then Question 1.1 and 1.2 should be filled in.

- 1.1. List down **all the entities** through which your company employs any other persons in Malta that were not reported in the Employment Section A.
- 1.2. Provide the aggregate number of **employees working with the entities** listed in Q1.1 as at the end of reporting period (30 June or 31 December).

In Question 1.1, the operator should provide a list of all the entities with which the other staff is employed.

In Question 1.2, the aggregate number of employees working with such entities should be reported. Again, such employment refers to (1) additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees do not necessarily need to be on the payroll of the licensed entity).

Again, for the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

In similarity with Section A, the data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management).

2. Out of the total number of non-Maltese employees, indicate how many are **non-EU nationals**.

Public Page 25 of 72



In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1.2 (Employment - Section B), are non-EU nationals, if any. In case there weren't any, this question will not appear on your screen.

#### 2.2.8 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the <u>Policy on Outsourcing by Authorised Persons</u>, where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if it had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based** in Malta?

1.2 Which of the following services, functions and/or processes were outsourced to **companies** based abroad?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and, or managing player funds

Public Page 26 of 72



- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game

#### 2.2.9 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year for Revenue and Employment.

It should be noted that this Section is only applicable for the reporting period 1 July - 31 December.

#### 2.2.10 Skills Gap

In order to obtain a better understanding of the existing skills gap in the gaming industry, the MGA is collecting data on a six-monthly basis which is then aggregated and presented in a report which is published on an annual basis. To access the latest report, please refer to the <u>Publication page</u> on the MGA's website.

This section includes a set of questions which should be answered specifically to the licensee's opinion about the Maltese gaming employment market.

In the case where the licensee <u>did not have</u> any vacancies in Malta as at the end of the reporting period, questions 2 and 2.1 should be answered as zero.

In terms of questions 2, 3 and 3.1, the below is a non-exhaustive list of the typical job roles included within the categories listed:

- Game operation and development: Head of Poker, Poker Manager, Casino Coordinator, Casino Campaign Manager, Mobile Product Manager, Head of Sportsbook, Sportsbook Manager/Product Development, Odds Compiler Specialist, Senior Bookmaker, Senior Trader.
- **Data and analysis:** Head of Analytics, Analytics Manager, Business Data Analyst, Data Warehouse Architect, Head of BI, BI developer.
- Marketing (incl. Customer Care): CRM Manager, Head of Brand, Digital Marketing Manager, Head
  of Affiliates, Head of SEO, Chief Commercial Officer, Head of Customer Care, Sportsbook
  Marketing Manager, Digital Content Manager, Copywriter, Social Media analyst, Graphic Designer.
- Legal and compliance, risk and fraud: Legal Compliance Manager, Legal Counsel, Chief Risk Officer, Fraud Manager, Fraud Analyst.
- **Technology**: Senior Software Developer, Front-end Developer, Back-end Developer, Web Developer, Web UX/UI Designer, Senior QA-Engineer, Platform Engineer, Software Engineer.
- **Finance, payment and human resources**: Chief Financial Officer, Payments and Reconciliation Analyst, HR Manager, Recruiter, Trainer.

Public Page 27 of 72



#### 2.2.11 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

Public Page **28** of **72** 



# 2.3 IPR for B2C & B2B - Gaming Service Licence and Critical Gaming Supply Licence holders

The following section aims to provide the necessary supporting information on how to fill each request for data which is set out in the IPRs.

#### 2.3.1 Customer Accounts

1. Number of **all unique registered accounts** <u>as at the end</u> of reporting period (30 June or 31 December) per company licensed by the MGA.

In this question, the data provided should represent the total of registered accounts (irrespective of their status, be it, active, suspended, inactive etc.) under the Maltese gaming licence as at the end of June or the end of December for the year under review.

The word unique implies that any accounts that may exist across multiple brands and/or websites are not to be counted more than once.

2. Number of **new registered accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

This question requires the number of new registered player accounts during the reporting period (1 January - 30 June or 1 July - 31 December).

3. Number of **active player accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

The data submitted in this question should reflect the total number of active player accounts for the MGA licensed activity, defined as:

those accounts for customers that played at least once during the specified reporting period.

It is accepted that there might be an overlap of players which were active in both reporting periods (1 January - 30 June <u>and</u> 1 July - 31 December). To this end, when the IPR refers to the reporting period 1 July - 31 December, the following question applies:

3.1 Number of **unique active player accounts** <u>during the year</u> (1 January - 31 December) per company licensed by the MGA.

The intention of this question is to capture the <u>unique and distinctive</u> number of active player accounts <u>during the entire year</u> that should not include any double counting of accounts.

Public Page 29 of 72



4. Number of **new active player accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

The data provided for this question should reflect the total number of <u>new</u> active player accounts under the MGA licensed activity, defined as:

those accounts on which customers played <u>for the first time</u> during their lifetime with the company licensed by the MGA during the specified reporting period.

5. Number of **suspended player accounts** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

The number of suspended player accounts refers to the total number of <u>active accounts that have been suspended/blocked by the operator</u>, for any reason, during the specified reporting period. This should exclude accounts that were temporarily suspended due to self-exclusion.

6. In actual terms, indicate the **age distribution of the active players** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

Question 6 requires the age distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

7. In actual terms, indicate the **gender of the active players** during the reporting period (1 January - 30 June or 1 July - 31 December) per company licensed by the MGA.

This question requires the gender distribution of the active players based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under the header "not specified", please report all players that did not indicate their gender upon registration. This field can also be used by the licensees who did not collect information on gender. In such a case, a note in the Additional Notes section should be included.

8. In actual terms, indicate the distribution of the active players based on the amount of money wagered during the reporting period (1 January - 30 June / 1 July - 31 December) per company licensed by the MGA.

This question requires the active customer distribution in actual terms, according to the money wagered by players, based on the figures reported in Question 3. It is important that the total of this question is equal to the total in Question 3.

Public Page **30** of **72** 



9. Does the company offer a mobile application to its players?

This question requires a yes or no answer as to whether the licensee offers games to its players via a mobile application.

10. In monetary terms, indicate the **methods of payment for both deposits and withdrawals** used during the reporting period (1 January – 30 June or 1 July – 31 December).

This question requires in actual monetary terms (€), the methods of payment, for both deposits and withdrawals, broken down by the various methods provided, namely,

- Credit/debit cards
- Pre-paid vouchers
- Pre-paid debit cards
- E-wallet
- Online money remittance services
- Bank transfer
- Mobile Payment services (incl. by telecoms providers)
- Cash
- Virtual Financial Assets
- Other\*

\*When the category of "Other" is filled in, a description of such method should be provided in the relevant field.

11. Kindly list the exchange used to transfer VFA to and from fiat currency.

In this question, information on the exchange used to transfer VFA to and from fiat currency is required.

12. Do you hold other gaming licences apart for the one offered by the MGA, under the same company?

This question requires a yes or no answer as to whether the licensee holds any gaming licence apart from that granted by the MGA.

12.1 Indicate the jurisdiction(s) under which the company is licensed.

The above information must be added for <u>each country</u> by clicking on the red button "Add Country".

Add Country

Country 🕇

The following set of questions aims at capturing information on betting shops that are operated by the companies licensed by MGA **by country** during the six-month period under review.

Public Page 31 of 72



#### 13. Do you operate **betting shops** to provide services to customers?

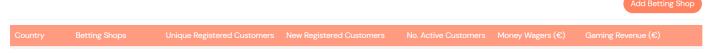
Question 13 requires information on whether the licensee operates any betting shops.

13.1 indicate the following information on betting shops per country: (a) **country** where the betting shops are located; (b) **total number of betting shops**; (c) total number of **unique** registered customers as at the end of the reporting period; (d) total **number of new registered customers**; (e) total number of **active** customers during the reporting period; (f) total **Money Wagers**; (g) total **Gaming Revenue**.

In the case where betting shops are operated, the following information must be provided in Question 13.1:

- Country where the betting shops are located;
- Total number of betting shops;
- Total number of unique registered customers as at the end of the reporting period;
- Total number of new registered customers;
- Total number of active customers;
- Total Money Wagers;
- Total Gaming Revenue.

The above information must be added for <u>each country</u> separately by clicking on the red button "Add Betting Shop".



#### 2.3.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of "suspicious betting" can vary among companies. To this end, an activity may be considered to be "suspicious" when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term "unusual activity" may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (eg. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously.
- New accounts that appear to have been opened specifically to bet on an event;
- · Accounts betting outside of their usual parameters;

Public Page 32 of 72



- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- · Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

#### 1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

## 2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January - 30 June or 1 July - 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent four questions should be answered.

3.1. Indicate the following information on suspicious betting events: (a) which **type of sports** pertain to suspicious betting events; (b) how many **instances relating to suspicious betting** were noted per sport, during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the operator shall provide the following information (a) which type of sports pertain to suspicious betting events and (b) how many instances relating to suspicious betting were noted per sport. The above information must be added for <u>each event</u> separately by clicking on the red button "Add Event". The type of sport is to be selected from the list provided.

Add Event

ype of Sport Instances of Suspicious Bettii

Public Page 33 of 72



3.2. From the total events noted in Q3.1, indicate how many suspicious betting events linked with sports integrity were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

In Question 3.2 the operator is requested to indicate how many of the suspicious betting events listed in Question 3.1 were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

3.3. How many **player accounts** linked with suspicious betting were noted during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3.3 required the licensee to provide how many player accounts were noted to be linked with suspicious betting during the respective reporting period, (1 January - 30 June or 1 July - 31 December).

3.4. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.4 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period, (1 January – 30 June or 1 July – 31 December).

- 4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January 30 June / 1 July 31 December)?
  - If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
  - If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1. Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) the number of **markets**, (b) the total **Real Money Wagers**, (c) the total **Winnings**, (d) the percentage share of **Real Money Wagers** out of total business, (e) the percentage share of **Gaming Revenue** out of total business, and (f) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport
- Number of markets offered
- Total real money wagers
- Total winnings

Public Page **34** of **72** 



- Percentage of real money wagers out of total business
- Percentage of gaming revenue out of total business
- Percentage share of real money wagers for live events, and for pre-events (separately)

The above information must be added for <u>each type of sport</u> separately by clicking on the red button "Add Sport".



	No. of Markets			Real Money Wagers out			
Type of Sport	Offered	Real Money Wagers (€)	Winnings (€)	of Total Business (%)	Business (%)	events (%)	events (%)

#### 2.3.3 Responsible Gambling

This section aims to provide further insights to the MGA on the responsible gambling tools implemented by the operators. This will assist the Authority to further consolidate its knowledge on the subject and impact of gambling and ensure the regulation is updated accordingly in the area.

1. Number of self-exclusion requests (sign-ups) by player.

The data provided in this question should reflect the number of <u>self-exclusion requests made by players</u> within the reporting period, categorised by age and duration (definite/indefinite).

The data provided under "definite" must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

2. Number of exclusions imposed by the B2C licensee.

The data provided in this question should reflect the number of <u>self-exclusion requests imposed by the licensee</u> within the reporting period, categorised by age and duration (definite/indefinite). It is important to note that the exclusions imposed by the B2C licensee refer **solely** to exclusions that relate to Responsible Gambling and exclude any other exclusions imposed for other reasons, such as AML issues.

The data provided under "definite" must **not** include time/session limits as these should be reported separately under Questions 9 and 9.1 within this section.

3. In actual terms, indicate the number of players who communicated to the operator that they were suffering from gambling addiction problems during the reporting period (1 January - 30 June or 1 July - 31 December):

This will require the operator to specify the number of players who have communicated to the operator that they were suffering from issues related to gambling addiction. In the case that the licensee does not have this information at their disposal, the field may be reported as 'N/A'.

Public Page **35** of **72** 



- 4. Does your company offer **self-exclusion reversals/cancellations** (excluding removals upon expiry) on player's request?
- 4.1 Indicate the number of requests, made by players, for self-exclusion reversals/cancellations during the reporting period (1 January 30 June or 1 July 31 December).

Question 4 starts with a leading question in order to establish whether the company offers self-exclusion reversals on player's request. Such requests refer to cancellations of self-exclusions which are solely by the relevant player and exclude those requests which are upon expiry of the set duration.

If the company offers such reversals, Question 4.1 should be filled in and provide for the number of requests, made by players, for self-exclusion reversals during the reporting period (1 January - 30 June or 1 July - 31 December).

5. Does your company offer the possibility to reduce self-exclusion period?

Question 5 requires the operator to indicate if the company offers players the possibility of reducing the self-exclusion period.

- 6. Does your company offer the possibility to set deposit limits?
- 6.1 Indicate the **unique number of players** that **set a deposit limit** on their account and the **unique number of players** that **hit this deposit limit** during the reporting period (1 January 30 June or 1 July 31 December).

Question 6 requires the operator to indicate whether it allows players to set a personal deposit limit (the amount of money or money's worth the player can deposit is limited for a period of time).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 6.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

- 7. Does your company offer the possibility to set wagering limits?
- 7.1 Indicate the **unique number of players** that **set a wagering limit** on their account and the **unique number of players** that **hit this wagering limit** during the reporting period (1 January 30 June or 1 July 31 December)

Question 7 requires the operator to indicate whether it allows players to set a wagering limit (the amount of money or money's worth the player can wager is limited for a period of time).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 7.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

Public Page **36** of **72** 



- 8. Does your company offer the possibility to set loss limits?
- 8.1 Indicate the **unique number of players** that **set a loss limit** on their account and the **unique number of players** that **hit this loss limit** during the reporting period (1 January 30 June or 1 July 31 December).

Question 8 requires the operator to indicate whether it allows players to set a loss limit (the amount of money or money's worth that can be lost by the player is limited for a period of time).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 8.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

- 9. Does your company offer the possibility to set time/session limits?
- 9.1 Indicate the unique number of players that set a time/session limit on their account and the unique number of players that hit this time/session limit during the reporting period (1 January 30 June or 1 July 31 December).

Question 9 requires the operator to indicate whether it allows players to set a time/session limit, (the amount of time which a player spends playing is limited).

In case it is allowed, the operator is required to provide the unique number of players that have set and hit (reached) this limit in Question 9.1. In case the requested information cannot be provided, an 'N/A' should be included in the dedicated filed.

## 2.3.4 Financial Info - Section A

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the <u>Gaming Licence Fees Regulations</u> and the <u>Directive on the Calculation of Compliance Contribution</u>.

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields circled in red in the below screenshot, the list of verticals will appear on the screen.

Public Page 37 of 72





It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.



In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports an explanation should be provided in Question 1.1.

2. For solely the activity generated through the MGA B2B licence, the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the <u>Gaming Licence Fees Regulations</u>, where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act. Such revenue needs to be provided for the reporting period under consideration.

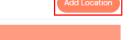
Public Page 38 of 72



Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the <u>sole location</u> where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".



Office Address Line 1

Office Address Line 2

City

Country

#### 2.3.5 Financial Info - Section B

This section aims at capturing the GR generated through the activities licensed by MGA, as defined by the <u>Gaming Licence Fees Regulations</u> and the <u>Directive on the Calculation of Compliance Contribution</u> **by country** during the six-month period under review.

1. Provide the breakdown of the **Gaming Revenue** generated solely through the MGA licences **by country** during the reporting period (1 January – 30 June or 1 July – 31 December).

The GR for <u>each country</u> needs to be added through the field provided separately. Ultimately, the total GR in both Section A and Section B of the Financial Info should tally.

## 2.3.6 Employment - Section A

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA, located in Malta and working solely on the gaming activities licensed by the MGA. <u>Data provided should not include persons not employed in relation to the licensed activity</u>.

1. Number of employees **working solely in Malta** on the **remote gaming activities** licensed by the MGA as at the end of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

• *Top Management*: executive top management and key function roles excluding any which are outsourced.

Public Page **39** of **72** 



- Full-Time: the employees who work for 40 hours or more in a work-week, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

## 2. Out of the total number of non-Maltese employees, indicate how many are non-EU nationals?

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1 (Employment - Section A), are non-EU nationals, if any. In case there were not any, this question will not appear on your screen.

## 3. Do you operate through a physical office in Malta?

- If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
- If the licensee operated through a physical office in Malta, it can proceed to the next question.

3.1. Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for <u>each office</u>, the size in square meters of the office space together with the corresponding locality. The above information must be added for <u>each office</u> separately by clicking on the red button "Add Office Space".



Square Meter

Locality

## 2.3.7 Employment – Section B

This section has been tweaked to capture <u>any additional staff in Malta</u> which is employed by the company and that does not work on the MGA licensed activities. To this end the summation of Section A and Section B should reflect the total employment of the company in Malta.

Such typical other staff reported in Section B should include:

- (1) additional employees engaged with the licensed entity working in Malta on the activities <u>not licensed</u> by the MGA; and/or
- (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees do not necessarily need to be on the payroll of the licensed entity).

For the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

Public Page **40** of **72** 



1. **In addition** to employees working in Malta on the remote gaming activities licensed by the MGA (as reported in the Employment – Section A), does your company employ **any other staff** in Malta who **do not work** on the remote gaming activities licensed by the MGA?

In Question 1, the operator should indicate if such employment exists.

If there is no such employment, the operator can indicate a 'No' and proceed to the next section. However, if such employment exists then question 1.1 and 1.2 should be filled in.

- 1.1 List down **all the entities** through which your company employs any other persons in Malta that were not reported in the Employment Section A.
- 1.2 Provide the aggregate number of **employees working with the entities** listed in Q1.1 as at the end of reporting period (30 June or 31 December).

In Question 1.1, the operator should provide a list of all the entities with which the other staff is employed.

In Question 1.2, the aggregate number of employees working with such entities should be reported. Again, such employment refers to (1) additional employees engaged with the licensed entity working in Malta on the activities not licensed by the MGA; and/or (2) employees that are employed with another associated/related company that is not licensed by the MGA (employees do not necessarily need to be on the payroll of the licensed entity).

Again, for the sake of clarity, in cases where the company filling the IPR falls within a group of companies which includes other MGA-licensed companies, each company filling the IPR shall not report in Employment – Section B any employees who work on MGA-licensed activities of any other company; such employees would be included in the Employment – Section A of the other company's IPR.

In similarity with Section A, the data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management).

2. Out of the total number of non-Maltese employees, indicate how many are non-EU nationals.

In this question, the data provided should indicate how many employees, out of the total number of non-Maltese employees reported in Question 1.2 (Employment - Section B), are non-EU nationals, if any. In case there weren't any, this question will not appear on your screen.

#### 2.3.8 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the <u>Policy on Outsourcing by Authorised Persons</u>, where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third party supplier may itself be an authorised or unauthorised person.

Public Page 41 of 72



1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January - 30 June or 1 July - 31 December)?

This question allows the licensee to indicate if it had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies based** in Malta?

1.2 Which of the following services, functions and/or processes were outsourced to **companies** based abroad?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and, or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game.

#### 2.3.9 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year for Gaming Revenue, Revenue and Employment.

Public Page **42** of **72** 



It should be noted that this Section is only applicable for the reporting period 1 July - 31 December.

## 2.3.10 Skills Gap

In order to obtain a better understanding of the existing skills gap in the gaming industry, the MGA is collecting data on a six-monthly basis which is then aggregated and presented in a report which is published on an annual basis. To access the latest report, please refer to the <u>Publication page</u> on the MGA's website.

This section includes a set of questions which should be answered specifically to the licensee's opinion about the Maltese gaming employment market.

In the case where the licensee <u>did not have</u> any vacancies in Malta as at the end of the reporting period, questions 2 and 2.1 should be answered as zero.

In terms of questions 2, 3 and 3.1, the below is a non-exhaustive list of the typical job roles included within the categories listed:

- Game operation and development: Head of Poker, Poker Manager, Casino Coordinator, Casino Campaign Manager, Mobile Product Manager, Head of Sportsbook, Sportsbook Manager/Product Development, Odds Compiler Specialist, Senior Bookmaker, Senior Trader.
- **Data and analysis:** Head of Analytics, Analytics Manager, Business Data Analyst, Data Warehouse Architect, Head of BI, BI developer.
- Marketing (incl. Customer Care): CRM Manager, Head of Brand, Digital Marketing Manager, Head
  of Affiliates, Head of SEO, Chief Commercial Officer, Head of Customer Care, Sportsbook
  Marketing Manager, Digital Content Manager, Copywriter, Social Media analyst, Graphic Designer.
- Legal and compliance, risk and fraud: Legal Compliance Manager, Legal Counsel, Chief Risk Officer, Fraud Manager, Fraud Analyst.
- **Technology**: Senior Software Developer, Front-end Developer, Back-end Developer, Web Developer, Web UX/UI Designer, Senior QA-Engineer, Platform Engineer, Software Engineer.
- **Finance, payment and human resources**: Chief Financial Officer, Payments and Reconciliation Analyst, HR Manager, Recruiter, Trainer.

#### 2.3.11 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

Public Page **43** of **72** 



## 3 Guidelines on Required Data - Land-based Channel

## 3.1 IPR for B2C - Gaming Service Licence holders

## 3.1.1 Players' Visits

This section focuses on obtaining information pertaining to the players, in terms of the total number of visits as well as their age, gender, nationality, the number of new registrations and junket players (for casinos' operators only). This data should be provided separately for each operator category that the licensee holds, namely, casino, gaming parlours and commercial bingo halls, through the designated field.

For each relevant operator category data should be provided for the following questions:

1. Total number of unique players' visits the reporting period (1 January - 30 June or 1 July - 31

The data provided in this question should capture the total number of unique player visits' in the particular operator category during the reporting period under review. The total provided for the sixmonth period needs to be aligned with the licensee's monthly players' visits submissions.

A unique visit is defined to be the single count of a distinct player that visited the gaming establishment during a business day, irrespective of the number of times a player frequented the gaming establishment during the same business day.

Furthermore, a Business Day is defined as follows:

- In the case of a Casinos gaming establishment, in accordance with Directive 6 of 2019 Enhanced Automated Reporting Platform, a casino business day is defined to be the twenty-four hours ranging from 0800 of the preceding day to 0800 of the following day.
- In the case of Controlled Gaming Premises, in accordance with Article 16 (2) (h) of the Gaming Premises Regulations, a business day is defined to be the twelve hours ranging from 1100 to 2300 of the same day.
- In the case of other authorised land-based gaming establishments, namely commercial bingo halls and national lottery outlets, a business day is defined to be the daily hours when such establishments are open for players.

2. In actual terms, indicate the **age distribution** of players based on their visits, during the reporting period (1 January - 30 June or 1 July - 31 December).

Based on the total number of player visits reported in the previous question, Question 2 requires the age distribution of players. The total of the two questions should tally.

3. In actual terms, indicate the **gender of players** based on their visits, during the reporting period (1 January - 30 June or 1 July - 31 December).

Question 3 requires the gender distribution of players. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

Public Page **44** of **72** 



In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under "not specified", please report all players that did not indicate their gender.

4. In actual terms, indicate/split the no. of visits based on the **players' nationality**, during the reporting period (1 January - 30 June or 1 July - 31 December)

Question 4 requires the nationality of players, split between Maltese and Non-Maltese. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

5. Number of **new (unique) customer registrations** during the reporting period (January - 30 June or 1 July - 31 December).

Question 5 requires the number of new (unique) customer registrations made during the reporting period. It is generally accepted that there might be an overlap of players which registered more than once during the reporting period. In such cases exclude any double counting and provide the <u>unique</u> and <u>distinctive</u> number of new registrations during the reporting period.

6. Indicate the total number of **junket players**, in-house and with junket leader, visiting your premises during the reporting period (1 January - 30 June or 1 July - 31 December).

This question is solely applicable in the case when the operator category is Casinos. The data provided should reflect the number of junket players, split between in-house and with junket leader, for the reporting period in question.

## 3.1.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of "suspicious betting" can vary among companies. To this end, an activity may be considered to be "suspicious" when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term "unusual activity" may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (eg. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously.
- New accounts that appear to have been opened specifically to bet on an event;

Public Page **45** of **72** 



- · Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

## 1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.
- 2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January - 30 June or 1 July - 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent four questions should be answered.

3.1. Indicate the following information on suspicious betting events: (a) which **type of sports** pertain to suspicious betting events; (b) how many **instances relating to suspicious betting** were noted per sport, during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the operator shall provide the following information (a) which type of sports pertain to suspicious betting events and (b) how many instances relating to suspicious betting were noted per sport.

The above information must be added for <u>each event</u> separately by clicking on the red button "Add Event". The type of sport is to be selected from the list provided.

Public Page **46** of **72** 



Add Event

Type of Sport

Instances of Suspicious Betting

3.2. From the total events noted in Q3.1, indicate how many suspicious betting events linked with sports integrity were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

In Question 3.2 the operator is requested to indicate how many of the suspicious betting events listed in Question 3.1 were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

Question 3.3 is not applicable to this scenario.

3.4. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January - 30 June or 1 July - 31 December)?

In Question 3.4 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period, (1 January – 30 June or 1 July – 31 December).

- 4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January 30 June / 1 July 31 December)?
  - If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
  - If the licensee did offer any betting on sports events held in Malta, then an additional set of questions have to be answered.

4.1. Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) the number of **markets**, (b) the total **Real Money Wagers**, (c) the total **Winnings**, (d) the percentage share of **Real Money Wagers** out of total business, (e) the percentage share of **Gaming Revenue** out of total business, and (f) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport
- Number of markets offered
- Total real money wagers

Public Page **47** of **72** 



- Total winnings
- Percentage of real money wagers out of total business
- Percentage of gaming revenue out of total business
- Percentage share of real money wagers for live events, and for pre-events (separately)

The above information must be added for <u>each type of sport</u> separately by clicking on the red button "Add Sport".



					Gaming Revenue	Real Money	Real Money
	No. of Markets			Real Money Wagers out		Wagers on live	Wagers on pre-
Type of Sport	Offered	Real Money Wagers (€)	Winnings (€)	of Total Business (%)	Business (%)	events (%)	events (%)

## 3.1.3 Tables & Gaming Devices

This section aims at collecting information about the number of tables and the number of gaming devices as at the end of the reporting period.

Question 1 needs to be answered by all licensees holding a B2C licence.

1. Indicate the **number of gaming devices** (slot-type gaming machines and sports betting devices) as at the end of reporting period (30 June or 31 December).

The number of gaming devices, as at the end of the period under consideration, should be provided in this question. The data should be split between slot-type gaming machines and sports betting devices.

Questions 2 should only be answered if the operator category is that of a Casino.

2. Indicate the **number of tables** as at the end of reporting period (30 June or 31 December) for the following games.

The data provided in this question should be broken down further as per the following games:

- Blackjack
- Baccarat
- Casino Poker
- Casino Stud Poker
- Craps
- Punto Banco
- Roulette
- Russian Poker
- Super Pairs
- Texas Hold'em
- Three Card Poker
- Three Card Prime

Public Page 48 of 72



- WPT Heads up Hold'em
- Other\*

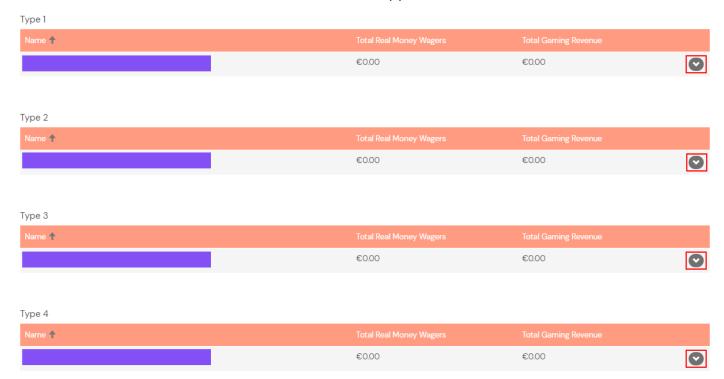
\*When the category of "Other" is filled in, a description of such method should be provided in the relevant field.

#### 3.1.4 Financial Information

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the <u>Gaming Licence Fees Regulations</u> and the <u>Directive on the Calculation of Compliance Contribution</u>.

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields circled in red in the below screenshot, the list of verticals will appear on the screen.



It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

Public Page **49** of **72** 



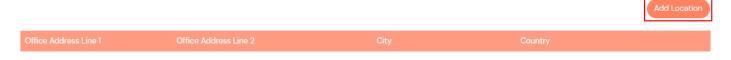


In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports an explanation should be provided in Question 1.1.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the <u>sole location</u> where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".



#### 3.1.5 Employment

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA. <u>Data provided should not include persons not employed in relation to the licensed activity</u>. The data provided should be split further by each operator category that the licensee holds, namely, casino, gaming parlours and commercial bingo halls, through the designated field.

1. Number of employees **working solely** on **land-based gaming activities** licensed by the MGA <u>as at the end</u> of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a work-week, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

Public Page **50** of **72** 



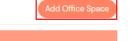
Question 2 is not applicable to this scenario.

#### 3. Do you operate through a physical office in Malta?

- If the licensee did not operate through a physical office in Malta, it can proceed to the next section.
- If the licensee operated through a physical office in Malta, it can proceed to the next section.

3.1. Indicate the location and relative **office space** from where the company operates in **Malta**, on the remote gaming activities licensed by the MGA as at the end of reporting (30 June / 31 December).

This question requires, for <u>each office</u>, the size in square meters of the office space together with the corresponding locality. The above information must be added for <u>each office</u> separately by clicking on the red button "Add Office Space".



Square Meter

Locality

## 3.1.6 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the <u>Policy on Outsourcing by Authorised Persons</u>, where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January - 30 June or 1 July - 31 December)?

This question allows the licensee to indicate if it had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

Public Page 51 of 72



1.1 Which of the following services, functions and/or processes were outsourced to **companies based** in Malta?

1.2 Which of the following services, functions and/or processes were outsourced to **companies** based abroad?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- · Holding and, or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game.

#### 3.1.7 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year for Gaming Revenue and Employment.

It should be noted that this Section is only applicable for the reporting period 1 July - 31 December.

## 3.1.8 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

Public Page **52** of **72** 



## 3.2 IPR for B2B - Gaming Service Licence holders

## 3.2.1 Players' Visits

This section <u>only applies</u> to B2C – Gaming Service licence holders. It <u>does not apply</u> to B2B – Critical Gaming Supply licence holders. Please move to the next section.

## 3.2.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of "suspicious betting" can vary among companies. To this end, an activity may be considered to be "suspicious" when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term "unusual activity" may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (eg. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously.
- New accounts that appear to have been opened specifically to bet on an event;
- Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

#### 1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.

## 2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

Public Page **53** of **72** 



3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January - 30 June or 1 July - 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent four questions should be answered.

3.1. Indicate the following information on suspicious betting events: (a) which **type of sports** pertain to suspicious betting events; (b) how many **instances relating to suspicious betting** were noted per sport, during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the operator shall provide the following information (a) which type of sports pertain to suspicious betting events and (b) how many instances relating to suspicious betting were noted per sport.

The above information must be added for <u>each event</u> separately by clicking on the red button "Add Event". The type of sport is to be selected from the list provided.



Type of Sport

Instances of Suspicious Betting

3.2. From the total events noted in Q3.1, indicate how many suspicious betting events linked with sports integrity were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

In Question 3.2 the operator is requested to indicate how many of the suspicious betting events listed in Question 3.1 were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

Question 3.3 is not applicable to this scenario.

3.4. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January - 30 June or 1 July - 31 December)?

In Question 3.4 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period, (1 January - 30 June or 1 July - 31 December).

Public Page **54** of **72** 



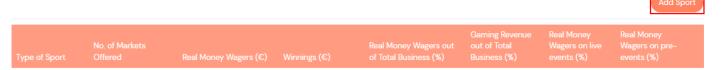
- 4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January 30 June / 1 July 31 December)?
  - If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
  - If the licensee did offer any betting on sports events held in Malta, then an additional set of
    questions have to be answered.

4.1. Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) the number of **markets**, (b) the total **Real Money Wagers**, (c) the total **Winnings**, (d) the percentage share of **Real Money Wagers** out of total business, (e) the percentage share of **Gaming Revenue** out of total business, and (f) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

- Type of sport
- Number of markets offered
- Total real money wagers
- Total winnings
- Percentage of real money wagers out of total business
- Percentage of gaming revenue out of total business
- Percentage share of real money wagers for live events, and for pre-events (separately)

The above information must be added for <u>each type of sport</u> separately by clicking on the red button "Add Sport".



## 3.2.3 Tables & Gaming Devices

This section <u>only applies</u> to B2C – Gaming Service licence holders. It <u>does not apply</u> to B2B – Critical Gaming Supply licence holders. Please move to the next section.

Public Page **55** of **72** 



#### 3.2.4 Financial Information

1. For solely the activity generated through the MGA B2B licence, on the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the <u>Gaming Licence Fees Regulations</u>, where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act.

Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the <u>sole location</u> where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".

Add Location

Office Address Line

Office Address Line 2

City

Country

## 3.2.5 Employment

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA located in Malta. <u>Data provided should not include persons not employed in relation to the licensed activity</u>. The data provided should be split further by each operator category that the licensee holds, namely, casino, gaming parlours and commercial bingo halls, through the designated field.

1. Number of employees **working solely** on **land-based gaming activities** licensed by the MGA <u>as at the end</u> of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl.

Public Page **56** of **72** 



Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the Total number of working hours per week should be recorded in the space provided.

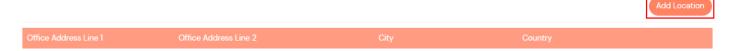
For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a work-week, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the addresses of the location/s where the company holds the accounting records. The above information must be added for <u>each location</u> separately by clicking on the red button "Add Location".



## 3.2.6 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the <u>Policy on Outsourcing by Authorised Persons</u>, where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January – 30 June or 1 July – 31 December)?

This question allows the licensee to indicate if it had any arrangements of this kind during the said reporting period.

- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

Public Page 57 of 72



1.1 Which of the following services, functions and/or processes were outsourced to **companies based** in Malta?

1.2 Which of the following services, functions and/or processes were outsourced to **companies** based abroad?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- · Holding and, or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game.

#### 3.2.7 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year for Revenue and Employment.

It should be noted that this Section is only applicable for the reporting period 1 July - 31 December.

#### 3.2.8 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

Public Page **58** of **72** 



## 3.3 IPR for B2C & B2B - Gaming Service Licence and Critical Gaming Supply Licence holders

### 3.3.1 Players' Visits

This section focuses on obtaining information pertaining to the players, in terms of the total number of visits as well as their age, gender, nationality, the number of new registrations and junket players (for casinos' operators only). This data should be provided separately for each operator category that the licensee holds, namely, casino, gaming parlours and commercial bingo halls, through the designated field.

For each relevant operator category data should be provided for the following questions:

1. Total number of **unique players' visits** the reporting period (1 January - 30 June or 1 July - 31

The data provided in this question should capture the total number of unique player visits' in the particular operator category during the reporting period under review. The total provided for the sixmonth period needs to be aligned with the licensee's monthly players' visits submissions.

A unique visit is defined to be the single count of a distinct player that visited the gaming establishment during a business day, irrespective of the number of times a player frequented the gaming establishment during the same business day.

Furthermore, a Business Day is defined as follows:

- In the case of a Casinos gaming establishment, in accordance with Directive 6 of 2019 Enhanced Automated Reporting Platform, a casino business day is defined to be the twenty-four hours ranging from 0800 of the preceding day to 0800 of the following day.
- In the case of Controlled Gaming Premises, in accordance with Article 16 (2) (h) of the Gaming Premises Regulations, a business day is defined to be the twelve hours ranging from 1100 to 2300 of the same day.
- In the case of other authorised land-based gaming establishments, namely commercial bingo halls and national lottery outlets, a business day is defined to be the daily hours when such establishments are open for players.

2. In actual terms, indicate the **age distribution** of players based on their visits, during the reporting period (1 January - 30 June or 1 July - 31 December).

Based on the total number of player visits reported in the previous question, Question 2 requires the age distribution of players. The total of the two questions should tally.

3. In actual terms, indicate the **gender of players** based on their visits, during the reporting period (1 January - 30 June or 1 July - 31 December).

Question 3 requires the gender distribution of players. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

Public Page **59** of **72** 



In this question, Gender X refers to:

a gender type which is not exclusively male or female, including those who identify with a gender other than male or female, as more than one gender, or as no gender, identifying as a combination of genders or not identifying with either gender at all.

Under "not specified", please report all players that did not indicate their gender.

4. In actual terms, indicate/split the no. of visits based on the **players' nationality**, during the reporting period (1 January - 30 June or 1 July - 31 December)

Question 4 requires the nationality of players, split between Maltese and Non-Maltese. This should be based on the total numbers reported in Question 1. The total of the two questions should tally.

5. Number of **new (unique) customer registrations** during the reporting period (January – 30 June or 1 July – 31 December).

This question requires the number of new (unique) customer registrations made during the reporting period. It is generally accepted that there might be an overlap of players which registered more than once during the reporting period. In such cases exclude any double-counting and provide the <u>unique</u> and <u>distinctive</u> number of new registrations during the reporting period.

6. Indicate the total number of **junket players**, in-house and with junket leader, visiting your premises during the reporting period (1 January - 30 June or 1 July - 31 December).

This question is solely applicable in the case when the operator category is Casinos. The data provided should reflect the number of junket players, split between in-house and with junket leader, for the reporting period in question.

## 3.3.2 Suspicious Betting

The IPR includes a section on Suspicious Betting. The Authority understands that the definition of "suspicious betting" can vary among companies. To this end, an activity may be considered to be "suspicious" when it is unusual in nature and cannot be explained or clarified via information procured from the public domain. The term "unusual activity" may refer to one of the following instances:

- Stakes and volumes above the average expectations for a particular market;
- Significant price movements;
- Price changes do not deter further unusual activity;
- Activity focused on specific markets when little other interest in an event (eg. a specific game betting market in tennis);
- In-play prices do not reflect the action in the relevant event;
- Activity focused on a participant or team who has appeared in suspicious matches previously.
- New accounts that appear to have been opened specifically to bet on an event;

Public Page **60** of **72** 



- · Accounts betting outside of their usual parameters;
- Accounts grouped in the same location/area, particularly if the area can be linked to the teams/participants or from a region where suspicious activity often occurs;
- Activity from accounts already being monitored due to activity of concern or accounts linked to previously suspended/closed/restricted accounts;
- Out of the ordinary deposits or funding method; and
- Activity from accounts of sporting participants or accounts likely linked to a participant.

## 1. Does your company possess a Type 2 approval?

Question 1 requires the licensee to indicate if the company has a Type 2 approval.

- If the licensee does not hold a Type 2 approval, it can proceed to the next section.
- If the licensee possesses a Type 2 approval, then an additional set of questions have to be answered.
- 2. Does your company have a system that flags out the instances of **suspicious betting linked with sports integrity**?

In Question 2 the operator is requested to indicate if the company makes use of a system that can flag out any instances of suspicious betting linked with sports integrity.

3. Did your company flag out any instances of **suspicious betting linked with sports integrity** during the reporting period (1 January - 30 June or 1 July - 31 December)?

Question 3 requests the licensee to indicate if the company did flag out any instances of suspicious betting linked with sports integrity during the reporting period, (1 January - 30 June or 1 July - 31 December).

In case the company did flag out instances of suspicious betting linked with sports integrity, then the subsequent four questions should be answered.

3.1. Indicate the following information on suspicious betting events: (a) which **type of sports** pertain to suspicious betting events; (b) how many **instances relating to suspicious betting** were noted per sport, during the reporting period (1 January – 30 June or 1 July – 31 December)?

In Question 3.1 the operator shall provide the following information (a) which type of sports pertain to suspicious betting events and (b) how many instances relating to suspicious betting were noted per sport.

Public Page **61** of **72** 



The above information must be added for <u>each event</u> separately by clicking on the red button "Add Event". The type of sport is to be selected from the list provided.

Add Event

Type of Spor

Instances of Suspicious Betting

3.2. From the total events noted in Q3.1, indicate how many suspicious betting events linked with sports integrity were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

In Question 3.2 the operator is requested to indicate how many of the suspicious betting events listed in Question 3.1 were reported to (a) Gambling regulator; (b) Betting integrity agency; (c) Sport governing body; and (d) Law enforcement agency.

Question 3.3 is not applicable to this scenario.

3.4. How many **sports betting markets** had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period (1 January - 30 June or 1 July - 31 December)?

In Question 3.4 the licensee is to indicate how many instances there were of sports betting markets that had all the bets placed on them cancelled due to suspicious activity, after the event took place during the reporting period, (1 January – 30 June or 1 July – 31 December).

- 4. Did your company offer any betting on sports events held in Malta during the reporting period (1 January 30 June / 1 July 31 December)?
  - If the licensee did not offer any betting on sports events held in Malta, it can proceed to the next section.
  - If the licensee did offer any betting on sports events held in Malta, then an additional set of
    questions have to be answered.

4.1. Solely for the **sporting events that were played in Malta** during the reporting period (1 January – 30 June / 1 July – 31 December) per company licensed by the MGA, provide the breakdown by the type of sports: (a) the number of **markets**, (b) the total **Real Money Wagers**, (c) the total **Winnings**, (d) the percentage share of **Real Money Wagers** out of total business, (e) the percentage share of **Gaming Revenue** out of total business, and (f) the percentage share of **Real Money Wagers** between live events and pre-event.

In the case where the company offered any betting on sports events held in Malta, the following information must be provided in Question 4.1:

Type of sport

Public Page **62** of **72** 



- Number of markets offered
- Total real money wagers
- Total winnings
- · Percentage of real money wagers out of total business
- Percentage of gaming revenue out of total business
- Percentage share of real money wagers for live events, and for pre-events (separately)

The above information must be added for <u>each type of sport</u> separately by clicking on the red button "Add Sport".



	No. of Markets			Real Money Wagers out	Gaming Revenue	Real Money Wagers on live	
Type of Sport		Real Money Wagers (€)	Winnings (€)	of Total Business (%)		events (%)	

#### 3.3.3 Tables & Gaming Devices

This section aims at collecting information about the number of tables and the number of gaming devices as at the end of the reporting period.

Question 1 needs to be answered by all licensees holding a B2C licence.

1. Indicate the **number of gaming devices** (slot-type gaming machines and sports betting devices) as at the end of reporting period (30 June or 31 December).

The number of gaming devices, as at the end of the period under consideration, should be provided in this question. The data should be split between slot-type gaming machines and sports betting devices.

Question 2 should only be answered if the operator category is that of a Casino.

2. Indicate the **number of tables** as at the end of reporting period (30 June or 31 December) for the following games.

The data provided in this question should be broken down further as per the following games:

- Blackjack
- Baccarat
- Casino Poker
- Casino Stud Poker
- Craps
- Punto Banco
- Roulette
- Russian Poker
- Super Pairs
- Texas Hold'em
- Three Card Poker

Public Page **63** of **72** 



- Three Card Prime
- WPT Heads up Hold'em
- Other\*

\*When the category of "Other" is filled in, a description of such method should be provided in the relevant field.

#### 3.3.4 Financial Information

1. Provide the breakdown of **Real Money Wagers** and **Gaming Revenue** generated solely through the MGA licences as submitted through the monthly Compliance Contribution reports to the MGA for the reporting period (1 January – 30 June or 1 July – 31 December).

This question refers to the totality of Real Money Wagers as well as the Gaming Revenue (GR) generated per game type for the MGA licensed activity which is in line with the definition provided by the <u>Gaming Licence Fees Regulations</u> and the <u>Directive on the Calculation of Compliance Contribution</u>.

The data needs to be provided by the various games for each of the four Game Types (Type 1, Type 2, Type 3 and/or Type 4). Operators need to complete only the relevant tables depending on the Game Types they offer. In order to report Real Money Wagers and GR, please click on one of the fields circled in red in the below screenshot, the list of verticals will appear on the screen.



It should be noted that in the Total summary fields (refer to screenshot below), which are computed automatically, the Total GR submitted through the Compliance Contribution reports for the period under review is also visible.

Public Page **64** of **72** 





In the case that the Total GR of the IPR does not match the Total GR of the Compliance Contribution reports an explanation should be provided in Question 1.1.

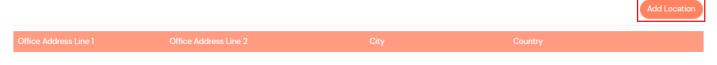
2. For solely the activity generated through the MGA B2B licence, the basis of generally accepted accounting principles, indicate the company's **revenue generated (as recorded in the financial statements/management accounts)** during the reporting period (1 January – 30 June or 1 July – 31

This question refers to the revenue generated split between the Game provider and the Back-end provider for the MGA licensed activity in line with the definition provided by the <u>Gaming Licence Fees Regulations</u>, where "revenue" shall, for the purposes of regulation 4(1) and (2), the Second Schedule and the Third Schedule, mean the actual revenue derived by the person in possession of the licence referred to in regulation 4(1) and (2) during the licence period and which revenue shall be determined on the basis of generally accepted accounting principles and practice as defined in article 2(4) of the Companies Act.

Only revenue generated under the B2B licence for the reporting period under consideration is to be provided.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the address of the <u>sole location</u> where the company holds the accounting records. The above information must be added for the location by clicking on the red button "Add Location".



#### 3.3.5 Employment

In this section, the data provided should indicate the total number of employees directly employed with the company licensed by the MGA. <u>Data provided should not include persons not employed in relation to the licensed activity</u>. The data provided should be split further by each operator category that the licensee holds, namely, casino, gaming parlours and commercial bingo halls, through the designated field.

Public Page **65** of **72** 



1. Number of employees **working solely** on **land-based gaming activities** licensed by the MGA <u>as at the end</u> of reporting period (30 June or 31 December).

The data reported in this question should be subdivided by nationality (Maltese and Non-Maltese) and gender (Male, Female or Gender X), and split between three categories, Top Management, Full-time (excl. Top Management) and Part-Time (excl. Top Management). In the case where Part-Time employees are reported, the total number of working hours per week should be recorded in the space provided.

For clarity's sake the subcategories are defined as follows:

- Top Management: executive top management and key function roles excluding any which are outsourced.
- Full-Time: the employees who work for 40 hours or more in a work-week, excluding those listed as "Top Management".
- Part-Time: the employees who work between 1 to 39 hours a week, excluding those listed as "Top Management".

Question 2 is not applicable to this scenario.

3. Indicate the **location and office address** where the company keeps the accounting records of the gaming activities licensed by the MGA as at the end of the reporting period (30 June or 31 December).

Question 3 requires the addresses of the location/s where the company holds the accounting records. The above information must be added for <u>each location</u> separately by clicking on the red button "Add Location".



Office Address Line 1

ffice Address Line 2

City

country

## 3.3.6 Outsourcing

The section on Outsourcing services focuses on the arrangements the licensee might have to outsource services, functions and, or processes in line with the <u>Policy on Outsourcing by Authorised Persons</u>, where outsourcing is defined as:

an authorised person's use of a third party, whether or not forming part of the same corporate group, to perform functions or provide services which would otherwise be undertaken by the authorised person. The third party supplier may itself be an authorised or unauthorised person.

1. Did your company **outsource any services, functions and/or processes** during the reporting period (1 January - 30 June or 1 July - 31 December)?

This question allows the licensee to indicate if it had any arrangements of this kind during the said reporting period.

Public Page **66** of **72** 



- If the licensee did not outsource any services during the reporting period, the licensee can proceed to the next section.
- If the licensee outsourced services during the reporting period, an additional two questions (Q1.1 & Q1.2) have to be answered, as per below:

1.1 Which of the following services, functions and/or processes were outsourced to **companies** based in Malta?

1.2 Which of the following services, functions and/or processes were outsourced to **companies** based abroad?

In case that there were any such arrangements, questions 1.1 and 1.2 should be filled in by indicating which type of services were outsourced to companies based in Malta and which were those outsourced to companies based abroad, as per the categories provided, namely:

- Accounting and/or tax advisory
- Back-up and disaster recovery
- Co-location services & other IT services
- Compliance
- Customer due diligence
- Event, content and odds provision for betting
- Fraud management
- General risk management services
- Holding and, or managing player funds
- Internal Audit
- Legal
- Marketing and advertising
- Player identity verification
- Player support
- Risk management services for the operation of a licensable game.

## 3.3.7 Business Trends

The Section on Business Trends requires some insights on the company's expectations during the current and coming year for Gaming Revenue, Revenue and Employment.

It should be noted that this Section is only applicable for the reporting period 1 July - 31 December.

#### 3.3.8 Additional Notes

In this section, it is possible to include any additional information which is necessary to support the submission made. In the case where the licensee is unable to provide complete information or is unsure whether the information provided meets the requirements of the IPR, such concerns should be listed in the Additional Notes section. Kindly provide a reference to which tab and question the comment relates.

Public Page **67** of **72** 



## 4 Frequently Asked Questions (FAQs)

#### 4.1 When are the IPRs due?

The MGA's Information Management unit approaches the industry on a bi-annual basis with the aim of collecting industry performance data. Data is collected for the following periods:

Time frame	Due Date		
1 January - 30 June	7 September		
1 July - 31 December	28 February		

#### 4.2 How do I submit the IPR?

The IPR is available on the Licensee Relationship Management System (LRMS) which can be accessed through <a href="https://portal.mga.org.mt/">https://portal.mga.org.mt/</a> and all operators are required to fill in and submit the IPR through that portal. The MGA will not be accepting any submissions made via other sources, like excel files, email or physical copies.

## 4.3 Do I have to complete the IPR?

Yes, all companies having an MGA's licence must complete the IPR form in a correct, complete and accurate manner, and submission is due every six months as requested by the Authority. This request for information is being made in terms of Article 7(2)(d) of the Gaming Act (Chapter 583 of the Laws of Malta).

## 4.4 Am I required to fill in a separate form for each licence type held with the MGA?

Once you log into the MGA online portal, the system will automatically provide you with the forms which need to be filled in and cover B2C - Gaming Service licence holders, B2B - Critical Gaming Supply licence holders as well as those holding both.

# 4.5 If I am a Corporate Licence holder, do I need to fill in a separate form for each company falling under the group?

In the case of Corporate Licence, you are requested to fill in and submit one form covering all the group companies with aggregate data for the entities falling under the group.

## 4.6 I am having trouble with filling in or submitting the IPR, who should I contact?

Contact the Information Management department via email on <a href="mailto:research.mga@mga.org.mt">research.mga@mga.org.mt</a> if any difficulty is encountered.

Public Page **68** of **72** 



## 4.7 Am I required to send a copy of the original Return by post?

No, there is no need to send a copy of the original IPR by post. The MGA will not be accepting any submissions if they are not made via the LRMS portal.

## 4.8 Will I receive a confirmation of my submission from the MGA?

Once you submit the IPR, you will not be receiving a message however the status of the Industry Performance Return will change to "Submitted" on the LRMS portal timeline.

Please note that after the IPR has been submitted, the MGA may still need to contact you for any further information it deems necessary in order to process your submission. The status of the submission will update accordingly on the LRMS portal.

## 4.9 My company was not operational during the period under review. Do I still need to submit the IPR?

Yes, if a licence holder has ceased trading in a particular activity, but still holds a valid licence at the time when a Return is due, a NIL Return must be submitted. A note to this effect should be included in the Additional Notes section.

## 4.10 We did not have any revenue during the period under review. Do I still need to submit the IPR?

Yes, kindly complete all other required fields and indicate "O" in the relevant fields. A note to this effect should be included in the Additional Notes section.

## 4.11 Our company is in the termination process. Do I still need to submit the IPR?

The MGA still requires your submission if the company had a valid licence (which was not yet terminated) during the period under review.

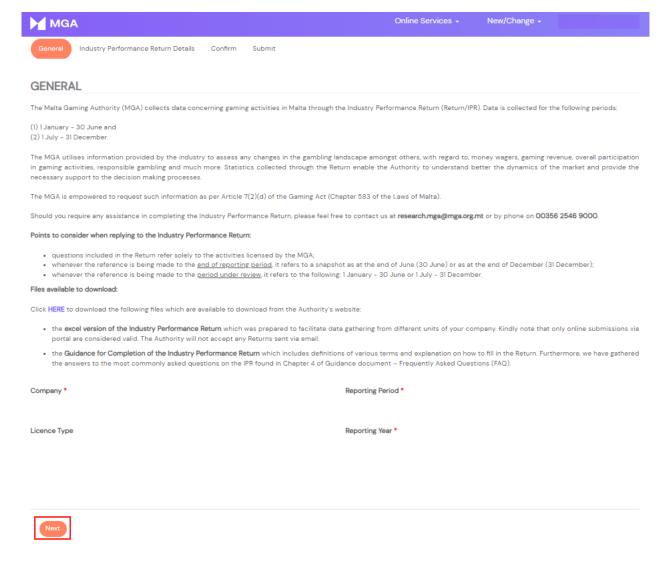
## 4.12 The company is in the application stage / has not gone live yet. Do I need to submit IPR?

If the company has not yet commenced any operation or has not gone live, but has received a general email from the Information Management team to submit the IPR and the IPR form appeared on the licensee's timeline on the LRMS portal, you are still requested to submit the Return by going through the following steps:

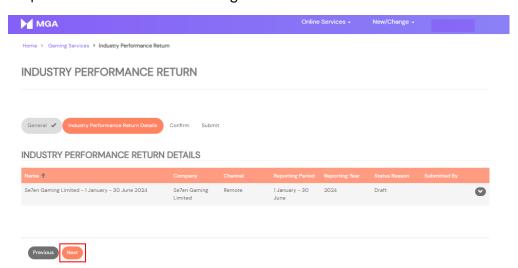
Step 1: Click Next on the following screen

Public Page **69** of **72** 





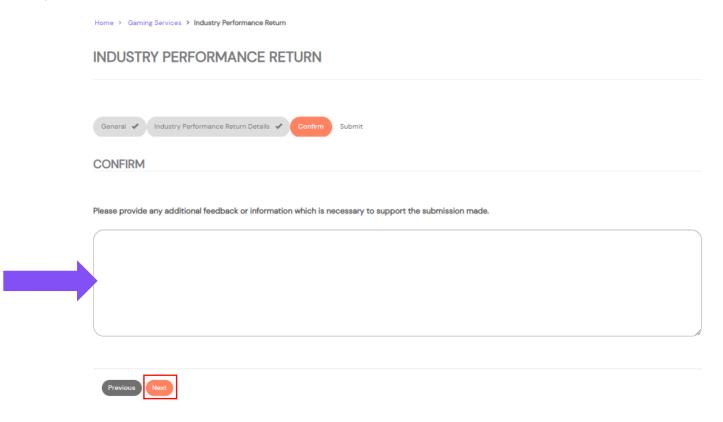
## Step 2: Click Next on the following screen



Public Page **70** of **72** 



Step 3: Include a note explaining that the Company has not yet commenced any operation or has not gone live and click Submit



# 4.13 Since our business cycle differs from the time frame of the IPR, our financial information will not be audited. How should we report our numbers?

The Authority accepts that financial information is unlikely to have been audited. Hence, you need to provide us with the most accurate information that you can generate for the given time frames.

## 4.14 How does the MGA use the information collected through the IPR?

The data collected is mainly utilised for regulatory, statistical and reporting purposes, with aggregate information being used for the publishing of both Interim and Annual Reports. In addition, the data collected assists the Authority to better regulate the sector and carry out its functions based on updated industry performance. It is believed that such industry performance reporting is beneficial and value adding to all stakeholders.

## 4.15 I am unable to provide the MGA with all the information requested. What should I do?

If you are unable to provide complete information or are uncertain that your information meets the requirements of the IPR, you should record this in the Additional Notes section. Kindly ensure that you record the question number to which your comment relates.

Public Page 71 of 72

