GLI STANDARD SERIES

GLI-33:

STANDARDS FOR EVENT WAGERING SYSTEMS

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About This Standard

Gaming Laboratories International, LLC (GLI) has developed this technical standard for the purpose of providing independent technical analysis and/or certifications to event wagering industry stakeholders indicating the state of compliance for event wagering operations and systems with the requirements set forth herein.

Operators and suppliers are expected to provide documentation, credentials, and associated access to source code and a production equivalent test environment with a request to the independent testing laboratory that it be evaluated in accordance with this technical standard. Upon the successful completion of testing, the independent testing laboratory will provide a report evidencing the evaluation of, or certification to, this standard.

GLI-33 should be viewed as a living document that will be tailored periodically to align with this developing industry over time as event wagering implementations and operations evolve.

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Chapter 1: Introduction to Event Wagering Systems

1.1 Introduction

1.1.1 General Statement

Gaming Laboratories International, LLC (GLI) has been testing Gaming Equipment since 1989. Over the years, GLI has developed numerous technical standards utilized by jurisdictions all over the world. This document, *GLI-33*, sets forth the technical standards for Event Wagering Systems.

1.1.2 Document History

This document is a compilation based upon many standards documents from around the world. Some were written by GLI; others were written by industry regulators with input from independent test laboratories and event wagering operators, developers, and suppliers. GLI has taken each of the standards documents and merged the unique rules, eliminated some rules and updated others, to reflect both the change in technology and the purpose of maintaining an objective standard that achieves common regulatory objectives without unnecessarily impeding technological innovation. It is the policy of GLI to update this document as often as warranted to reflect changes in technology and/or testing methods. This document will be distributed without charge and may be obtained by downloading it from the GLI website at www.gaminglabs.com or by contacting GLI at:

Gaming Laboratories International, LLC.
600 Airport Road
Lakewood, NJ 08701
Phone: (732) 942-3999
Fax: (732) 942-0043

1.1.3 Acknowledgment of Other Standards Reviewed

GLI acknowledges and thanks the regulatory bodies and other industry participants who have assembled rules, regulations, technical standards, and other documents which have been influential in the development of this document.

1.2 Purpose of Technical Standards

1.2.1 General Statement

The purpose of this technical standard is as follows:

a) To eliminate subjective criteria in the evaluation and/or certification of Event Wagering Systems.
b) To assess the criteria that impact the credibility and integrity of event wagering from both revenue collection and player perspectives.
c) To establish a standard that will ensure event wagering is fair, secure, auditable, and able to be operated correctly.

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d) To distinguish between local public policies and Independent Test Laboratory criteria, acknowledging that it is the prerogative of each regulatory body to set its own public policies with respect to event wagering.
e) To recognize that the evaluation of internal control procedures (such as anti-money laundering, financial, and business processes) employed by Event Wagering Operations should not be incorporated into the laboratory testing of the standard. Instead, these should be addressed within operational audits and assessments performed for local jurisdictions.
f) To develop a standard that can be easily revised to allow for new technology.
g) To formulate a standard that does not specify any particular design, method, or algorithm, thereby allowing a wide range of methods to conform to the standards while simultaneously encouraging the development of new methods.

1.2.2 No Limitation of Technology

One should be cautioned that this document shall not be read in such a way that limits the use of future technology. This document should not be interpreted to mean that if the technology is not mentioned, then it is not allowed. On the contrary, GLI will periodically review this standard and update it to include minimum standards for any new and relevant technology.

1.2.3 Adoption and Observance

This technical standard can be adopted in whole or in part by any regulatory body that wishes to implement a comprehensive set of technical requirements for Event Wagering Systems.

1.3 Other Documents That May Apply

1.3.1 Other GLI Standards

This technical standard covers the requirements for Event Wagering Systems. Depending on the technology utilized by a system, additional GLI technical standards may also apply.

NOTE: The entire family of GLI Standards is available free of charge at www.gaminglabs.com.

1.3.2 Minimum Internal Control Standards (MICS)

Implementing Event Wagering Systems is a complex endeavor, necessitating the development of internal processes and procedures to ensure that the Event Wagering System's Gaming Production Environment (GPE) is secure and controlled adequately. To that end, it is expected that a set of Minimum Internal Control Standards (MICS) will be established by the regulatory body to determine the minimum required internal processes for the management and handling of event wagering as well as the requirements for internal control of any system or component software and hardware within the system's GPE, and their associated accounts. The regulatory body's MICS may also include technical security controls and testing requirements as well as change management policies for the system's GPE.

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1.3.3 Gaming Security Framework (GSF)

Adherence to the *GLI Gaming Security Framework (GLI-GSF)* is strongly recommended for Event Wagering Systems. The GLI-GSF details technical security controls and testing requirements, which will be assessed during evaluations of the Event Wagering System's Gaming Production Environment (GPE) as described in Appendix B: Integrity and Security Assessments. This includes, but is not limited to, operational process reviews critical to compliance, vulnerability and penetration testing of the external and internal infrastructure and applications handling sensitive information, and any other criteria set by the regulatory body.

NOTE: The *GLI Gaming Security Framework (GLI-GSF)* is available free of charge at www.gaminglabs.com.

1.4 Interpretation of this Document

1.4.1 General Statement

This technical standard applies to systems that support wagering on sporting events or games, competitions, contests, matches, races, or other occurrences or type of activity approved by the regulatory body. The requirements in this technical standard apply to wagering on events in a way that is general in nature and does not limit or authorize specific wagering events, markets, or wager types. The intent is to provide a framework to cover those currently known and permitted by law.

1.4.2 System Configuration and Operational Responsibilities

The components of an Event Wagering System, although they may be constructed in a modular fashion, are intended to function cohesively.

a) Event Wagering Systems may be developed to have configurable features; the final configuration of which depends on the options selected for the Event Wagering Operation. From a testing perspective, it might not be possible to test all of the configurable features of an Event Wagering System submitted by a Software Supplier in the absence of the final configuration; however, the configuration that will be utilized in the system's GPE shall be communicated to the independent test laboratory to facilitate creating a production equivalent test environment.
b) Because of the integrated nature of the Event Wagering Operation, requirements in this document may be satisfied through the technological capabilities of the Event Wagering System, internal control procedures, or a combination thereof, as applicable. The collection of systems and solutions deployed to support event wagering shall be considered the system's GPE, and the individual entities providing them shall meet such eligibility requirements as the regulatory body deems appropriate for their respective functions.

NOTE: Unless otherwise specified, requirements applicable to the Event Wagering Operation may be satisfied by the Operator, Software Suppliers, Third-Party Service Providers, or other parties, individually or collectively, according to their respective responsibilities. This document is not intended to prescribe the allocation of responsibilities among these parties, except where expressly stated, or to alter their regulatory accountability under applicable regulatory requirements.

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1.4.3 Use of "Mechanisms"

When a requirement in this technical standard requires that a "mechanism" be in place, it means that the Event Wagering Operation shall use a critical component, an integrated solution, or a clear, documented process that has been effectively implemented to achieve the desired outcome. Event Wagering Operations have the flexibility to determine what type of mechanism is best for the situation at hand, whether it is by the use of technology, an operational procedure, or a mix of activities. Compliance shall be evaluated based on the effectiveness of the overall mechanism rather than the use of any specific implementation approach.

1.5 Testing and Auditing

1.5.1 Laboratory Testing

The independent test laboratory will test and evaluate or certify components of the Event Wagering System against the applicable requirements of this technical standard within a production equivalent test environment, where applicable.

a) Unless otherwise directed by the regulatory body, the independent test laboratory shall be provided access to the source code of each component submitted for evaluation or certification, along with sufficient documentation or evidence to verify that the submitted component was compiled from that source code and is identical to the resulting compiled output.
b) As determined by the regulatory body, additional laboratory testing may be required when components are integrated with the Event Wagering System, particularly where integration involves modifications to previously evaluated or certified components.
c) Where the regulatory body has adopted a change management program (CMP), such as the *GLI Change Management Program Guide (GLI-CMP)*, the CMP will be used to determine which changes to previously evaluated or certified components require modification testing. The scope of such testing will depend on the nature, extent, and potential impact of the changes.
d) Requirements of this technical standard that necessitate supplemental operational procedures to demonstrate compliance may be identified in the evaluation or certification report and incorporated into the scope of applicable operational audits and assessments.

NOTE: Upon request or as required by the regulatory body, the independent test laboratory will conduct additional compliance testing to verify that the Event Wagering System, as implemented within its Gaming Production Environment (GPE), is configured and operating in accordance with these standards and any additional requirements specified by the regulatory body.

1.5.2 Operational Audits and Assessments

The integrity and reliable operation of an Event Wagering System depend not only on laboratory evaluation and certification but also on the operational procedures, system configurations, and network infrastructure supporting its Gaming Production Environment (GPE). Accordingly, where required by the regulatory body, the following operational audits and assessments shall be performed at the frequency adopted or specified by the regulatory body:

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a) An Internal Controls Audit, against the applicable internal control procedures identified in Appendix A: Internal Control Procedures and the regulatory body's Minimum Internal Control Standards (MICS); and
b) An Integrity and Security Assessment, as described in Appendix B: Integrity and Security Assessments, against the applicable controls and tests identified in the *GLI Gaming Security Framework (GLI-GSF)* and any other controls and tests identified by the regulatory body.

NOTE: Regulatory bodies are encouraged to allow flexibility in audit and assessment schedules for multi-jurisdictional Event Wagering Operations to allow the consolidation of audits and assessments across multiple jurisdictions on a common schedule, provided applicable regulatory requirements are met.

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Chapter 2: Platform/System Requirements

2.1 Introduction

2.1.1 General Statement

If the Event Wagering System is comprised of multiple computer systems at various sites, the system as a whole and all communication between its components shall conform to the applicable technical requirements within this document.

2.2 System Clock Requirements

2.2.1 System Clock

The Event Wagering System shall maintain an internal clock that reflects the current date and time that shall be used to provide for the following:

a) Time stamping of all transactions, wagering events, and configuration changes related to the regulated functions of the system;
b) Time stamping of significant events; and
c) Reference clock for reporting.

2.2.2 Date and Time Synchronization

The Event Wagering System shall implement a mechanism to ensure that the date and time of all components that comprise the system are synchronized daily or operate on a common date and time reference sufficient to maintain the validity of time-based communications.

2.3 Control Program Requirements

2.3.1 Control Program Self-Verification

The Event Wagering System shall be capable of verifying that all critical control program components contained on the system are unaltered versions of authentic components of the system using a software solution evaluated by the independent test laboratory or other method approved by the regulatory body. The critical control program verification function shall:

a) Perform self-verification of the critical control programs at least once every twenty-four hours, or at another frequency specified by the regulatory body, and on demand.
b) Employ a cryptographic secure hash algorithm or equivalent that produces a message digest of at least 128 bits. Other test methodologies may be used where determined to be suitable by the independent test laboratory and approved by the regulatory body on a case-by-case basis in accordance with recognized industry standards.
c) Include all critical control programs which may affect regulated functions of the system, including but not limited to executables, libraries, wagering or system configurations, server-side wagering files, customized operating system files, components that directly control required system reporting, and database elements that directly affect system operations.

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d) Record the results of each self-verification in a log maintained for at least ninety days or for another period specified by the regulatory body, including:
   i. The date and time of the verification;
   ii. For on demand verifications, unique user account ID or equivalent executing the verification;
   iii. Identification of each critical control program, its expected signature, and the signature generated by the verification; and
   iv. Any other pertinent validation information (e.g., hash results and seeds used).
e) Provide an indication of the verification failure if any critical control program is determined to be invalid.

NOTE: To ensure full compliance, the critical control program verification function may need to be installed on each server hosting critical control programs that comprise the system, including all Player Account Managers and Wagering Platforms, if such functionality is not centralized to a single server.
NOTE: This requirement does not apply to Player Applications, including client-side graphics and audio files (e.g., wagering rules, help screens, etc.).

2.3.2 Control Program Independent Verification

Each critical control program of the Event Wagering System shall have a method to be verified via an independent third-party verification process. The third-party verification process shall operate independently of any process or security software within the system.

NOTE: The independent test laboratory, prior to system certification, will evaluate the verification process in accordance with recognized industry standards.

2.4 Wagering Communications and Controls

2.4.1 Communication Loss

If communications between critical components of the Event Wagering System are lost which would impact the overall operation of the system, the affected components shall cease operations related to that communication. Detection of such communication failures may occur upon an attempted communication between components.

2.4.2 Wagering Management

The Event Wagering System shall be able to disable or suspend the following on demand, as applicable. A mechanism shall be in place to record the date and time for disabling or suspending:

a) All event wagering activity;
b) Individual wagering events and markets;
c) Individual bonusing/promotional offers;
d) Individual Retail Wagering Terminals; and
e) Individual Remote Player Device logins.

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2.5 Information to be Maintained

2.5.1 Information Retention

The Event Wagering System shall be capable of maintaining and backing up all applicable recorded information as discussed within this section, with timestamps and versioned data fields where relevant to the integrity and auditability of the records, unless properly communicated to or recorded by another Gaming System or Solution, which will assume these responsibilities:

a) Where applicable, bonusing/promotional amounts shall be recorded separately from other amounts (e.g., for wagers, wins or payouts, voids or cancellations, etc.); and
b) There shall be a mechanism to export this recorded information in machine-readable format for the purposes of analysis and auditing/verification (e.g., CSV, JSON, XLS, PDF, etc.).

NOTE: Internal control procedures shall be in place to ensure this information is recorded by the operator or a Third-Party Service Provider where it is not maintained directly by the system.

2.5.2 Wager Record Information

The information to be maintained and backed up for each individual wager placed by the player shall include, as applicable:

a) Unique wager record ID;
b) The date and time the wager was placed;
c) Each player choice involved in the wager:
    i. Unique wagering event ID and/or market ID, if different;
    ii. The description of the wagering event, market, and wager type (e.g., moneyline, point spreads, over/under, win/place/show, parlay, etc.);
    iii. Wager selection (e.g., athlete or team name and number) or combination of selections chosen, including selection names where practical;
d) Odds/payouts applicable at the time the wager was placed;
e) Total amount wagered;
f) Total amount paid or to be paid for settled or redeemed wagers;
g) Total amount voided or cancelled;
h) Rake, commission, or fees collected;
i) Any special conditions applying to the wager;
j) Unique player account ID, for wagers placed using a player account;
k) Unique user account IDs or equivalent of any authorized personnel assisting the player;
l) For any retail wagers:
    i. Unique terminal IDs or equivalent which issued, settled, redeemed, voided, and cancelled the wager record;
    ii. Wagering Venue Name/Site IDs where issuance, settlement, redemption, voiding, and cancellation occurred;
    iii. The payment method (e.g., cash, personal check, cashier's check, wire transfer, money order, debit instrument, electronic payment account);
    iv. The redemption period;
    v. Open text field for attendant input of player description or picture file, if supported;

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m) For any remote wagers:
   i. Relevant player access information (e.g., device identifier and type, application identifier and version, and connection type);
   ii. Relevant device location data from the most recent geolocation check, where geolocation is supported or required by the regulatory body;
n) The outcome of the wager, if known, including whether the wager was settled through an early settlement feature; and
o) The current status of the wager (e.g., pending, active, settled, redeemed, void, cancelled, expired, etc.) and, where recorded, the history of previous status changes, including their dates and times.

2.5.3 Wagering Event/Market Information

The information to be maintained and backed up for each individual wagering event and market available for wagering shall include, as applicable:

a) Unique wagering event ID and/or market ID, if different;
b) The description of the wagering event, market, and wager type (e.g., moneyline, point spreads, over/under, win/place/show, parlay, etc.);
c) Available wager selections (e.g., athletes or team names and numbers) and amount wagered per wager selection;
d) The date and time the wagering period started or is scheduled to start, if known;
e) The date and time the wagering period ended or is expected to end, if known;
f) Total amount wagered;
g) Total amount paid or to be paid for settled or redeemed wagers;
h) Total amount voided or cancelled;
i) Total rake, commission, or fees collected;
j) The date and time the wagering event occurred or is expected to occur, if known;
k) The wagering event and market result (e.g., winning wager selection);
l) The date and time that the wagering event and market result was confirmed, if known; and
m) The current status of the wagering event and market (e.g., pending, in progress, interrupted, void, cancelled, confirmed, etc.) and, where recorded, the history of previous status changes, including their dates and times.

2.5.4 Contest/Tournament Information

Where contests/tournaments are supported, the information to be maintained and backed up for each contest/tournament shall include, as applicable:

a) Name or identification of the contest/tournament;
b) The participating wagering event IDs and/or market IDs, if different;
c) The date and time the contest/tournament occurred or is expected to occur, including any applicable participation period, if known;
d) For each participating player:
   i. Unique player account ID and/or name;
   ii. Amount of entry fee collected, if any, and the date and time collected;
   iii. Player scores, rankings, or completion of defined wagering or activity objectives;
   iv. Amount of winnings paid or awards issued, and the date and time paid or issued;

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e) Total amount of entry fees collected;
f) Total amount of winnings paid or awards issued to players;
g) Total amount voided or cancelled;
h) Total rake, commission, or fees collected; and
i) The current status of the contest/tournament (e.g., pending, in progress, interrupted, void, cancelled, complete, etc.) and, where recorded, the history of previous status changes, including their dates and times.

2.5.5 Player Account Information

Where player account management is supported, the information to be maintained and backed up for each player account shall include, as applicable:

a) Unique player account ID and username, if different;
b) The date and method of account registration (remote or on-site), including relevant device location data, where geolocation is supported or required by the regulatory body;
c) The personally identifiable information (PII) collected to register a player and create the account, including their full legal name, date of birth, residential address, contact information, and any other information required by the Event Wagering Operation or the regulatory body;
d) The following items, which shall be protected using industry-standard cryptographic controls (e.g., encryption, hash algorithms, etc.):
    i. The player's full or partial government identification number (driver's license number, social security number, taxpayer identification number, passport number, or equivalent);
    ii. The player's current payment methods or identifiers that link the player account to personal financial information maintained by the Payment Processor (e.g., debit instrument numbers, electronic payment account numbers, or equivalent information), and any previous such payment methods or identifiers stored on the system in whole or in part;
    iii. The player's current authentication credentials, and any previous credentials stored in whole or in part on the system;
e) The date and method of identity verification (automatic or manual) and details, including:
    i. If a government-issued identification credential is used for identity verification, a description of the credential provided by the player to confirm their identity and its date of expiration;
    ii. If a government-issued identification credential is not used for identity verification, a description of the mechanism used to confirm the player's identity;
f) The date of player agreement to the applicable terms and conditions and privacy policies;
g) Previous player accounts, if any, and reason for closure;
h) Account details and current account balance. All discretionary account funds (i.e., restricted bonusing/promotional credits and bonusing/promotional credits that have a possible expiration) shall be maintained separately;
i) The date and time the account is accessed by any person (e.g., player, authorized personnel, etc.), including any relevant player access information (e.g., device identifier and type, application identifier and version, and connection type);
j) Limitation/time-out/suspension information:
    i. The date and time of the request;
    ii. Description of limitation/time-out/suspension, including the reason, if recorded;
    iii. The type of limitation/time-out/suspension (e.g., self-imposed weekly deposit limitation, three-day time-out, involuntary suspension, etc.);

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iv. The date and time limitation/time-out/suspension commenced;
v. The date and time limitation/time-out/suspension ended;

k) Financial Transaction information:
i. Unique transaction ID;
ii. The date and time of the transaction;
iii. The type of transaction (e.g., deposit, withdrawal, adjustment, non-wager purchase, etc.);
iv. The transaction amount;
v. Total account balance before/after transaction;
vi. Total amount of fees paid for transaction, if any;
vii. The payment method (e.g., cash, personal check, cashier's check, wire transfer, money order, debit instrument, electronic payment account);
viii. Deposit authorization number or equivalent;
ix. For non-wager purchases, a description of the item or entitlement acquired (cosmetic items, display customization options, etc.) and any applicable expiration date or period;
x. Relevant player access information (e.g., device identifier and type, application identifier and version, and connection type);
xi. Relevant device location data from the most recent geolocation check, where geolocation is supported or required by the regulatory body;
xii. The current status of the transaction (e.g., pending, in progress, interrupted, void, cancelled, complete, etc.) and, where recorded, the history of previous status changes, including their dates and times;

l) Player attribute information, if supported by the Event Wagering System:
i. Unique assignment or use ID;
ii. If tied to a particular wagering event or market, unique wagering event ID and/or market ID, if different;
iii. The date and time of its assignment or use;
iv. The criteria for its assignment or use (e.g., quantity of winning wagers, subscriptions, account memberships, player tracking information, wager requirements of the wagering event or market, etc.);
v. The type of action taken, or alteration made to wagering (e.g., wagering events, markets, and wager types offered, wagering rule change, odds/payouts and prices change, or other configuration change related to the wager or wager result, etc.);
vi. Any other information necessary to reconcile its assignment or use;
vii. The current status of its assignment or use (e.g., pending, active, inactive, paused, cancelled, etc.) and, where recorded, the history of previous status changes, including their dates and times;

m) The date and method of account closure (remote or on-site), including the reason for closure;
n) Unique user account IDs or equivalent of any authorized personnel assisting the player or accessing their account; and
o) The current status of the player account (e.g., pending, active, inactive, closed, suspended, etc.) and, where recorded, the history of previous status changes, including their dates and times.

2.5.6 Bonusing/Promotional Offer Information

Where bonusing/promotional offers are supported, the information to be maintained and backed up for each bonusing/promotional offer shall include, as applicable:

a) Unique bonusing/promotional offer ID;

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b) The bonusing/promotional offer terms, or a reference to their retained version, specifying the applicable wagering events or markets and offer parameters (e.g., value, eligibility, restrictions, order of precedence, etc.);
c) The date and time the offer was or is scheduled to be made active, if known;
d) The date and time the offer was or is scheduled to be retired, if known;
e) Current amount available under the bonusing/promotional offer, where quantifiable;
f) Total bonusing/promotional amounts issued;
g) Total bonusing/promotional amounts redeemed;
h) Total bonusing/promotional amounts expired;
i) Total bonusing/promotional offer adjustments; and
j) The current status of the bonusing/promotional offer (e.g., pending, active, disabled, retired, etc.) and, where recorded, the history of previous status changes, including their dates and times.

2.5.7 Retail Wagering Terminal Information

Where retail wagering is supported, the information to be maintained and backed up for each Retail Wagering Terminal shall include, as applicable:

a) Unique terminal ID or description (e.g., serial number, manufacturer, asset ID, etc.);
b) Wagering Venue Name/Site ID;
c) The type of terminal (e.g., OTC Wagering Terminal, Self-Service Wagering Terminal, etc.);
d) Terminal configuration data (e.g., peripherals, communications including IP Address, etc.);
e) Locally installed critical control programs;
f) For Self-Service Wagering Terminals:
    i. Significant event information required for that type of terminal;
    ii. Metering information required for that type of terminal;
g) For OTC Wagering Terminals:
    i. Unique user account ID or equivalent for the attendant session;
    ii. The date and time the attendant session began and ended;
    iii. The terminal balances at the start and end of the attendant session;
h) For each wager, wagering instrument, or financial transaction:
    i. Unique transaction ID;
    ii. The date and time of the transaction;
    iii. For wagers, the type of transaction (e.g., placement, redemption, void, cancellation, etc.) and the unique wager record ID;
    iv. For wagering instruments, the type of transaction (e.g., issuance, redemption, void, etc.) and the unique validation number;
    v. For financial transactions, the type of transaction (e.g., deposit, withdrawal, adjustment, etc.) and the unique player account ID;
    vi. The transaction amount;
    vii. The current status of the transaction (e.g., pending, in progress, interrupted, void, cancelled, complete, etc.) and, where recorded, the history of previous status changes, including their dates and times;
i) The current status of the terminal (e.g., active, disabled, decommissioned, etc.) and, where recorded, the history of previous status changes, including their dates and times.

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2.5.8 System Significant Event and Alteration Information

System significant event and alteration information to be maintained and backed up shall include, as applicable:

a) Failed user account access attempts, including associated IP address or other applicable information, where necessary for investigating potentially fraudulent user activities;
b) Program error or signature mismatch;
c) Significant periods of unavailability of any critical component of the system (e.g., any length of time wagering is halted for all players, communications are halted, and/or system functions cannot be successfully completed for any user);
d) Large wagers (single and aggregate over a specific time period) exceeding an operation-established threshold not greater than any regulatory body-specified threshold, including wager record information;
e) Large wins or payouts (single and aggregate over a specific time period) exceeding an operation-established threshold not greater than any regulatory body-specified threshold, including wager record information;
f) System voids, overrides, and corrections;
g) Changes to live data files occurring outside of normal program and operating system execution;
h) Changes to policies and parameters for operating systems, databases, networks, and applications (e.g., audit settings, authentication credential complexity settings, system security levels, manual updates to databases, etc.) that affect the regulated functions of the system;
i) Changes to date and time on master time server or common date and time reference;
j) Changes to the download data library, including the addition, changing, or deletion of software, where supported;
k) Changes to previously established criteria for a wagering event or market (not including line posting changes for active markets);
l) Changes to the result of a wagering event or market;
m) Changes to bonusing/promotional offer parameters (e.g., value, eligibility, restrictions, etc.);
n) Player Account Management:
    i. Adjustments to a player account balance;
    ii. Changes made to sensitive information recorded in a player account (e.g., registration information, authentication credentials, payment methods, etc.);
    iii. Operation-imposed lock-out, time-out, suspension, or closure of a player account;
    iv. Large financial transactions (single and aggregate over a specific time period) exceeding an operation-established threshold not greater than any regulatory body-specified threshold, including financial transaction information;
    v. Negative account balance (due to adjustments and/or chargebacks);
o) Irrecoverable loss of sensitive information (permanent loss, corruption, or deletion of such information where restoration from backup or other recovery mechanisms is not possible);
p) Any other abnormal system events that require manual user intervention to restore normal operations, excluding routine or expected operational activities; and
q) Other significant or unusual events as deemed applicable by the regulatory body.

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2.5.9 User Account Information

The information to be maintained and backed up for each user account shall include, as applicable:

a) Unique user account ID and username, if different;
b) User's name and assigned role, job title, or position, where necessary for access control, authorization, audit, or regulatory oversight;
c) Full list and description of functions that each group or user account may execute;
d) The date and time the account was created;
e) The date and time of each access, including associated IP address or other applicable information, where necessary for investigating potentially fraudulent user activities;
f) The date and time of each authentication credential change;
g) The date and time the account was disabled or deactivated, including the reason, if recorded;
h) Group membership of user account; and
i) The current status of the user account (e.g., pending, active, inactive, disabled, deactivated, etc.) and, where recorded, the history of previous status changes, including their dates and times.

2.6 Reporting Requirements

2.6.1 General Reporting Requirements

The Event Wagering System shall be capable of providing the necessary information to produce reports as required by the regulatory body, unless properly communicated to or recorded by another Gaming System or Solution, which will assume these responsibilities. In addition to meeting the requirements in the section above for "Information Retention", the following requirements shall apply for required reports:

a) These required reports shall be able to be produced on demand, and for intervals required by the regulatory body (e.g., day-to-date (DTD), week-to-date (WTD), month-to-date (MTD), year-to-date (YTD), life-to-date (LTD), etc.).
b) Each required report shall contain, as required by the regulatory body:
    i. The Event Wagering Operation's name (or other identifier);
    ii. The title of report, including any distinguishing factors and applied information filters;
    iii. The selected interval of activity;
    iv. The date and time that the report was produced;
    v. Labeled fields (e.g., rows, columns, etc.), which can be clearly understood in accordance with their function;
    vi. Subtotals and grand totals when appropriate; and
    vii. An indication of "No Activity" or similar message if no information appears for the period specified.
c) Where applicable, each required report shall separately indicate bonusing/promotional amounts from other amounts (e.g., for wagers, wins or payouts, voids or cancellations, etc.) unless otherwise specified by the regulatory body.

NOTE: In addition to the reports outlined in this section, the regulatory body may also require other reports utilizing the information stored under the "Information to be Maintained" section of this document.

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2.6.2 Wagering Revenue Reports

The following information shall be provided to produce one or more reports on wagering revenue for each wagering event as a whole and for each individual market within that wagering event, as applicable:

a) Unique wagering event ID and/or market ID, if different;
b) The description of the wagering event, market, and wager type (e.g., moneyline, point spreads, over/under, win/place/show, parlay, etc.);
c) The date and time the wagering event started and ended, if known;
d) Total amount wagered;
e) Total amount paid or to be paid for settled or redeemed wagers;
f) Total amount voided or cancelled;
g) Total rake, commission, or fees collected;
h) The date and time that the wagering event and market result was confirmed, if known; and
i) The status(es) of the wagering event and market (e.g., pending, in progress, interrupted, void, cancelled, confirmed, etc.) and the date and time of any status changes during the reporting interval.

2.6.3 Operation Liability Reports

The following information shall be provided to produce one or more reports on operation liability, as applicable:

a) For player accounts, the starting liability amount (total amount held by the Event Wagering Operation), total additions and subtractions to account balances, and the ending liability amount for the reporting interval;
b) The total amount of wagers placed on future wagering events;
c) The total amount of winnings or payouts owed but unpaid or partially paid by the Event Wagering Operation on settled wagers; and
d) Any operational funds used to cover other categories of operation liability specifically identified by the regulatory body.

2.6.4 Future Events/Markets Reports

The following information shall be provided to produce one or more reports on each future wagering event or market for the gaming day, as applicable:

a) Unique wagering event ID and/or market ID, if different;
b) Total and by wager:
    i. Wagers placed prior to the gaming day for future wagering events and markets (e.g., wager placed yesterday, settles tomorrow);
    ii. Wagers placed on the gaming day for future wagering events and markets (e.g., wager placed today, settles tomorrow);
    iii. Wagers placed prior to the gaming day for wagering events and markets settling on the gaming day (e.g., wager placed yesterday, settles today);

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iv. Wagers placed on the gaming day for wagering events and markets settling on the gaming day (e.g., wager placed today, settles today); and
v. Wagers voided or cancelled on the gaming day.

2.6.5 Player Account Activity Report

Where player account management is supported, the following information shall be provided to produce one or more reports for each player account, as applicable:

a) Unique player account ID;
b) Beginning account balance;
c) Total amounts deposited;
d) Total amounts withdrawn;
e) Total amounts wagered;
f) Total amounts won or paid out;
g) Total amounts adjusted;
h) Total amounts for other additions to, or deductions from, the account balance; and
i) Ending account balance.

2.6.6 System Significant Events and Alterations Reports

The following information shall be provided to produce one or more reports for each system significant event or alteration, as applicable:

a) The date and time of the significant event or alteration;
b) Event/component identification;
c) Identification of each individual who performed and/or authorized the significant event or alteration;
d) Reason/description of the significant event or alteration, including data or parameter altered;
e) Data or parameter value before alteration; and
f) Data or parameter value after alteration.

NOTE: Please reference the "System Significant Event and Alteration Information" section of this technical standard for a list of system significant events and alterations.

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Chapter 3: Player Account Requirements

3.1 Introduction

3.1.1 General Statement

The requirements of this chapter apply to player accounts supported by the Event Wagering System and maintained by the Event Wagering Operation. In addition to the requirements contained within this chapter, the operational procedures and controls indicated in the "Player Account Controls" section of this document shall also be met.

NOTE: Player accounts are required for a player to participate in remote wagering.

3.2 Player Account Registration and Verification

3.2.1 General Statement

The requirements of this section apply to player account registration, identity verification, and activation of player accounts where such functionality is supported directly by the Event Wagering System.

NOTE: Where this functionality is not supported directly by the Event Wagering System, the Event Wagering Operation shall establish processes and procedures to meet the requirements of this section.

3.2.2 Account Registration

Before a player account can be established, there shall be a mechanism to collect the player's personally identifiable information (PII) for the registration process.

a) At a minimum, each player shall provide and confirm the accuracy of the following information, unless otherwise specified by the regulatory body:
   i. Full legal name (first name and last name);
   ii. Date of birth (month, day, and year);
   iii. Contact information (email address and/or phone number);
   iv. Physical residential address (a post office box or equivalent is not acceptable);
   v. Full or partial government identification number (driver's license number, social security number, taxpayer identification number, passport number, or equivalent); and
   vi. Any additional information required by the regulatory body or needed to verify the player's identity or eligibility, manage the player account, prevent fraud, or meet applicable legal and regulatory requirements.

b) During the registration process, the player shall:
   i. Be denied the ability to establish or activate a player account for event wagering if they submit a date of birth indicating that they do not satisfy the applicable minimum age requirement;
   ii. If not all registration fields are required, be informed on the registration form which fields are required, which fields are optional, and the consequences of failing to complete any required fields; and

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iii. Be provided with links to the terms and conditions for accessing and using the player account and the privacy policies governing the protection of PII and acknowledge acceptance of both.

3.2.3 Know-Your-Customer (KYC) Solution

The Event Wagering System shall implement a Know-Your-Customer (KYC) Solution provided in-house or by a third-party KYC Service Provider to perform identity verification and assist in performing eligibility checks prior to player account activation.

a) Unless otherwise specified by the regulatory body, identity verification and eligibility checks shall use the player's full legal name, physical residential address, date of birth, full or partial government identification number, and any additional information required by the regulatory body or necessary to verify the player's identity and eligibility.
b) Identity verification and eligibility checks shall confirm that the player is not:
   i. Underage or using the personally identifiable information (PII) of a deceased individual;
   ii. On any time-out or suspension lists maintained by the Event Wagering Operation;
   iii. On any exclusion lists provided or recognized by the regulatory body; or
   iv. Otherwise prohibited from establishing or accessing a player account.

NOTE: The requirements of this section apply to the independent test laboratory's testing of the KYC Solution as implemented within the Event Wagering System, as part of the overall system evaluation or certification. Requirements pertaining to the evaluation of the KYC Solution itself and assessments of the KYC Service Provider are addressed in the "KYC Service Providers and Solutions" section of this document.
NOTE: Additional identity verification and eligibility checks may be performed at any time during the life of a player account where there is reasonable suspicion that the player's identity has been compromised.

3.2.4 Multi-Factor Authentication (MFA)

To support player account activities requiring Multi-Factor Authentication (MFA), the player shall establish the authentication credentials necessary to complete MFA before account activation.

a) MFA shall use at least two independent authentication factors from the following categories:
   i. Something the player knows, such as a password, passphrase, or Personal Identification Number (PIN);
   ii. Something the player possesses, such as a hardware token, software token, authenticator application, or One-Time Authentication Credential (OTAC);
   iii. Something that identifies the player through biometrics, such as a fingerprint, facial recognition, or iris recognition, using a secure authenticator associated with the device or otherwise securely managed, where permitted by applicable data privacy and security laws, regulations, and standards observed by the regulatory body; or
   iv. Another authentication factor approved by the regulatory body in accordance with recognized industry standards.
b) A single authentication credential, such as a passkey, may satisfy MFA requirements if it verifies at least two independent authentication factors, such as possession of an authenticator application combined with verification through a PIN or biometrics.

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3.2.5 Account Activation

The player account shall not be activated or allowed to accept deposits or place paid wagers until:

a) The player account registration process has been completed, including the player acknowledging the applicable terms and conditions and privacy policies.
b) Identity verification and eligibility checks have been successfully completed;
c) The player establishes the authentication credentials necessary to complete MFA; and
d) It has been confirmed that the player does not already have another active player account, unless specifically authorized by the regulatory body.

NOTE: Additional identity verification may be performed at any time during the life of a player account where there is reasonable suspicion that the player's identity has been compromised.

3.3 Player Account Management

3.3.1 Authentication Credentials and Trusted Devices

The Player Account Manager shall allow a player to securely log in to their player account using authentication credentials, such as a username (or similar) and a strong password, passkey, biometrics, or a secure alternative means. Allowable authentication credentials and authentication methods are subject to the discretion of the regulatory body as necessary. This requirement does not prohibit the option for more than one method of authentication being available for a player to access their account.

a) If the Player Account Manager does not recognize the authentication credentials provided, an explanatory message shall prompt the player to try again. The message shall be the same regardless of which credential is incorrect.
b) The Player Account Manager shall support, through configurable settings or built-in functionality, requiring MFA for player account logins from a Remote Player Device at intervals not exceeding fourteen days, or another period specified by the regulatory body. MFA shall be enforced where required by the regulatory body, subject to the following:
    i. Following successful MFA, the account-device pairing shall be granted trusted status for the applicable period, during which MFA is not required for subsequent logins.
    ii. The applicable period of trusted status shall restart upon each subsequent successful MFA using the same account-device pairing, including MFA performed for other player account activities.
    iii. Trusted status shall be maintained independently for each account-device pairing.

NOTE: A previously successful MFA may satisfy MFA requirements for multiple account activities performed using the same player account and Remote Player Device within twenty-four hours of the most recent successful MFA, or another period specified by the regulatory body, provided it remains valid under the established authentication controls and additional MFA is not required for a particular activity, based on risk, or by the regulatory body. For example, a player who successfully completes MFA during login may subsequently update registration information without repeating MFA within the applicable period.

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3.3.2 Account Recovery and Lockouts

The Player Account Manager shall support secure mechanisms for recovering access to player accounts and locking out accounts, when necessary, subject to the following:

a) Where a player has forgotten or lost access to their authentication credentials, MFA shall be employed for their retrieval, reset, or replacement. Where the player cannot complete MFA, an alternative secure account recovery process shall be provided that includes appropriate identity verification.
b) The player account shall be automatically locked-out after three consecutive failed access attempts in a thirty-minute period, or another threshold, period, or equivalent risk-based detection methodology specified or approved by the regulatory body. MFA shall be employed for the account to be unlocked. Alternatively, the system may, as supported, automatically release a locked-out account after thirty minutes, or another period determined by the regulatory body, provided no other account restriction or suspension applies.
c) The system shall support a mechanism that allows for a player account to be locked-out in the event that suspicious player activity is detected. MFA shall be employed for the account to be unlocked, provided the suspicious player activity has been investigated and determined to be unfounded or otherwise resolved.

3.3.3 Post-Login Information and Functions

Once a player is successfully logged in, the Player Account Manager shall make the following available to the player:

a) Any material updates to the terms and conditions and/or privacy policies (i.e., beyond any grammatical or other minor changes) which shall be agreed upon by the player prior to allowing wagering or financial transactions related to the update.
b) The last date and time the player logged into their player account, where required by the regulatory body.
c) Current account balance information. All discretionary account funds (i.e., restricted bonusing/promotional credits and bonusing/promotional credits that have a possible expiration) shall be indicated separately.

3.3.4 Access Inactivity

After thirty minutes of inactivity while logged into their player account on a Remote Player Device, or another period determined by the regulatory body, the player shall be required to re-authenticate to access their player account on that device.

a) No further wagers or financial transactions on that device are permitted until the player has been re-authenticated.
b) A simpler means may be offered for a player to re-authenticate following inactivity, such as operating system-level authentication (e.g., biometrics), a passkey, or a Personal Identification Number (PIN), provided that the account-device pairing maintains its trusted status, unless prohibited by the regulatory body.

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NOTE: Where the system provides one-way communication or content streaming and the player's expected interaction is passive, such as viewing the transmission of a wagering event, the absence of player input shall not, by itself, cause the player to be treated as inactive, unless otherwise specified by the regulatory body.

3.3.5 Account Information Access and Updates

The Player Account Manager shall allow a player to view and update their registration information, manage authentication credentials and account recovery information, and view, add, modify, or remove stored payment methods, subject to the following:

a) The player shall be authenticated before accessing this information or associated management functions. Sensitive information shall be appropriately hidden or masked when displayed unless full disclosure is necessary for an authorized purpose, including:
   i. Government identification numbers, which shall be at least partially masked;
   ii. Authentication credentials;
   iii. Account recovery information, including associated contact information; and
   iv. Payment method identifiers (e.g., debit instrument numbers and electronic payment account numbers), which shall be at least partially masked.
b) The Player Account Manager shall support, through configurable settings or built-in functionality, requiring MFA before a player completes specific account-related or financial actions based on applicable risk-based controls. MFA shall be enforced for any of the following actions, as applicable, where required by the regulatory body:
   i. Updating registration information or account recovery information;
   ii. Changing player's authentication credentials;
   iii. Adding or modifying payment methods or identifiers that link the player account to personal financial information maintained by the Payment Processor (e.g., debit instrument numbers, electronic payment account numbers, or equivalent information).
c) Updates to registration information shall be verified as appropriate, subject to the following:
   i. Changes to the player's recorded date of birth or government identification number shall require independent verification of the player's authorization and validation of the updated information; and
   ii. Changes to information previously used to verify the player's identity or determine eligibility shall be verified before further paid wagering or financial transactions are permitted, with enhanced identity verification performed where necessary.
d) New or updated authentication credentials, account recovery information, and payment methods shall be appropriately verified before use.
e) Where permitted, authorized personnel may update registration information or add, modify, or remove payment methods on behalf of a player, provided appropriate identity verification, access controls, audit logging, and safeguards against unauthorized changes are in place.
f) The player shall be notified through previously verified contact information upon completion of updates to registration information or payment methods, including any required verification.

3.3.6 Financial Transactions

Funds may be deposited to or withdrawn from the player account using payment methods allowed by the regulatory body and supported by the Player Account Manager. Where financial transactions can be performed by the Player Account Manager, the following requirements shall be met:

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a) The system shall provide confirmation or denial of each financial transaction, including:
   i. The type of transaction (deposit/withdrawal);
   ii. The transaction amount; and
   iii. For denied transactions, an appropriate message as to why the transaction could not be completed, without revealing sensitive information that could compromise security, fraud prevention, compliance, or investigations.
b) If a player initiates a financial transaction and that transaction would exceed limits put in place by the Event Wagering Operation and/or regulatory body, this transaction may only be processed provided that the player is clearly notified that they have withdrawn or deposited less than requested.
c) The funds deposited shall not be available for wagering until the funds have been received from the payment provider or the payment provider provides an authorization number or equivalent, authorizing the transaction.
d) Where Electronic Funds Transfers (EFT) are permitted, the Player Account Manager shall use appropriate mechanisms to reasonably detect and prevent EFT fraud. Unless otherwise specified by the regulatory body:
   i. The player account shall be temporarily locked-out for investigation after five consecutive failed EFT attempts within a ten-minute period, or another threshold, period, or equivalent risk-based detection methodology specified or approved by the regulatory body. The account may be unlocked if no evidence of fraud is found.
   ii. If the account is unlocked and five additional consecutive failed EFT attempts occur within a ten-minute period, or another threshold, period, or equivalent risk-based detection methodology specified or approved by the regulatory body, the account shall be suspended pending further investigation.
   iii. Failed EFT attempts caused by verified technical or processing errors shall not count toward these limits. Previous successful EFT transactions without outstanding chargebacks may be considered when assessing potential fraud but shall not exempt the account from these requirements.
e) The Player Account Manager shall prevent any withdrawal activity initiated by a player that would result in a negative account balance. Where payment processing issues outside the control of the system cause an account to be overdrawn, the player account shall be suspended until the negative account balance is settled or otherwise resolved.
f) Unless otherwise specified by the regulatory body, withdrawals from a player account shall be paid directly to an electronic payment account in the name of the player or made payable to the player and forwarded to the player's residential address using a secure delivery service or through another payment method that is not prohibited by the regulatory body. The name and residential address shall match the recorded registration information.
g) It shall not be possible to transfer funds between player accounts associated with different players.
h) Security or authorization mechanisms shall be in place to ensure that only authorized adjustments can be made to player account balances, and these changes are auditable.

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3.3.7 Transaction Log or Account Statement

The Player Account Manager shall be able to provide a transaction log or account statement history to a player upon request. The information provided shall include sufficient information to allow the player to reconcile the statement or log against their own financial records. Information to be provided shall include, at a minimum, details on the following types of transactions within the past year or other time period as requested by the player or as required by the regulatory body, as applicable:

a) Financial transactions (transaction time stamped with a unique transaction ID):
   i. Deposits to the player account;
   ii. Withdrawals from the player account;
   iii. Bonusing/promotional amounts added to/removed from the player account (outside of wagers);
   iv. Manual adjustments or modifications to the player account (e.g., due to refunds);
   v. Any non-wager purchases, including the item or entitlement acquired (cosmetic items, display customization options, etc.);
b) Wagers (placement/settlement/redemption time stamped with a unique wager record ID):
   i. The description of the wagering event, market, and wager type (e.g., moneyline, point spreads, over/under, win/place/show, parlay, etc.);
   ii. Total amount wagered;
   iii. Total amount paid for settled or redeemed wagers;
   iv. Total bonusing/promotional amounts wagered/awarded;
   v. Total amount voided or cancelled;
   vi. Rake, commission, or fees collected;
   vii. The complete wager information as required by the "Wager Record" section of this document for wagers that have not yet been settled and wagers settled or redeemed within the past fourteen days, or another period specified by the regulatory body; and
c) Any other additions to, or deductions from, the account balance that would not otherwise be metered under any of the above-listed items.

3.3.8 Account Closure

Players shall be provided with a mechanism to request closure of their player account at any time unless the Event Wagering Operation has suspended the account for reasons that prevent closure. Authorized personnel shall also be able to close an account on behalf of a player upon request or where otherwise necessary.

a) The account closure process shall begin immediately when the request is received. The account shall be closed after:
   i. All active wagers have been settled, redeemed, voided, or cancelled in accordance with the applicable terms and conditions; and
   ii. Any remaining unrestricted player funds have been refunded to the player, provided the operation has confirmed that the funds have cleared.
b) After requesting account closure, the player shall not be encouraged or offered incentives to keep their account open. However, the operation may explain the consequences of closing the account and ask the player to confirm their decision.

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3.3.9 Inactive Player Accounts

The Player Account Manager shall have a mechanism for authorized personnel to identify, manage, or close player accounts considered to be inactive under the conditions as specified in the terms and conditions. Any unrestricted player funds remaining in a closed inactive player account shall be refunded or otherwise handled in accordance with applicable regulatory requirements and the Event Wagering Operation's internal control procedures.

3.4 Limitations, Time-Outs, and Suspensions

3.4.1 General Statement

The requirements in this section apply where the Player Account Manager supports the ability to directly manage and implement responsible gaming tools, including limitations, time-outs, and/or suspensions.

NOTE: Where implementing and managing responsible gaming tools are not supported directly by the Player Account Manager, the Event Wagering Operation shall utilize processes and procedures to satisfy the requirements of this section.

3.4.2 Limitations

Players shall be provided at all times with a mechanism to impose limitations for account activity including but not limited to deposits and wagers over a specified time period (e.g., day, week, month) as required by the regulatory body. Authorized personnel shall also be able to impose limitations for account activity as required by the regulatory body.

a) Once established by a player and implemented by the system, it shall only be possible to reduce the severity of self-imposed limitations after the time period of the previous limit has expired, or as required by the regulatory body.
b) Players shall be notified in advance of any operation-imposed limits and their effective dates. Once updated, operation-imposed limits shall be consistent with what is disclosed to the player.
c) Upon receiving any self-imposed or operation-imposed limitation order, the system shall ensure that all specified limits are correctly implemented immediately or at the point in time (e.g., next login, next day) clearly indicated to the player.
d) The self-imposed limitations set by a player shall not override more restrictive operation-imposed limitations and vice-versa. The more restrictive limitations shall take priority.
e) Limitations shall not be compromised by internal status events, such as time-outs or suspension orders and revocations.

3.4.3 Time-Outs and Suspensions

Players shall be provided at all times with a mechanism to establish a time-out period or for a specified time period or suspend their player account indefinitely, as required by the regulatory body. Authorized personnel shall also be able to suspend an account as required by the regulatory body. During a time-out period or suspension:

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a) For time-outs, the player shall be provided with:
   i. Information on the remaining duration of their time-out; and
   ii. A mechanism to extend their time-out period or suspend their account.
b) For suspensions, the player shall be given a notification stating:
   i. That the account is suspended;
   ii. For involuntary suspensions, the reason for suspension, to the extent disclosure is permitted and does not compromise an ongoing investigation;
   iii. The restrictions placed on the suspended account; and
   iv. Where possible, general instructions for resolution.
c) The player shall be prevented from:
   i. Placing new wagers; and
   ii. Depositing funds to their player account with the exception of settling or resolving a negative account balance, but only to the extent the account balance is brought back to zero.
d) The player shall not be prevented from withdrawing any or all of their unrestricted player funds, provided that the operation acknowledges that the funds have been cleared, and for involuntary suspensions, that the reason for suspension would not prohibit a withdrawal.
e) For involuntary suspensions, the player shall be prevented from making changes to or closing their player account, unless authorized by the operation.

3.5 Bonusing/Promotional Offers

3.5.1 General Statement

Bonusing/promotional offers redeemable for cash, wagering credits, or merchandise prizes, or that provide items or entitlements which do not influence the outcome, odds/payouts, or prices of any wager (cosmetic items, display customization options, etc.), may be provided to a player based upon pre-determined events or criteria established by the parameters of the offers.

3.5.2 Cancellation of Offer Participation

The player shall be provided with a mechanism to cancel participation in a bonusing/promotional offer. In addition, there shall be a mechanism for authorized personnel to cancel participation on behalf of a player upon request or where otherwise necessary. Where applicable:

a) Upon request for cancellation, the player shall be informed of, in accordance with the terms of the offer:
   i. The value of unrestricted player funds that will be returned upon cancellation; and
   ii. The value of restricted bonusing/promotional credits that will be removed from the player account.
b) If the player elects to proceed with cancellation, unrestricted player funds remaining in a player account shall be returned in accordance with the terms of the offer.

3.5.3 Completion of Offer Terms

Once a player has met the terms of a bonusing/promotional offer, the winnings earned while participating in the offer shall not be limited (i.e., the restricted bonusing/promotional credits of the offer will become unrestricted bonusing/promotional credits).

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Chapter 4: Remote Player Device and Application Requirements

4.1 Introduction

4.1.1 General Statement

The requirements of this chapter apply to the Remote Player Devices and Player Applications used by the player to remotely take part in wagers and financial transactions with the Event Wagering System over a public network or private network, depending on the implementations authorized by the regulatory body.

4.2 Player Applications and Devices

4.2.1 General Statement

A Remote Player Device interacts with the Event Wagering System through a Player Application, which may be downloaded to or installed on the device (mobile application or desktop application), accessed through the device's browser interface (web application), or implemented through a combination of these methods.

4.2.2 Device Identification

The Event Wagering System shall employ reliable mechanisms to generate or utilize a reasonably persistent, tamper-resistant identifier for each Remote Player Device, consistent with the capabilities and limitations of the device's underlying operating system, browser, or platform.

4.2.3 Application Identification

Player Applications shall contain sufficient information to identify the application and its version, which, for example, may be displayed via a display screen or contained in the application source code.

4.2.4 Application Validation

For Player Applications installed locally on the Remote Player Device, it shall be possible to validate that the application is an authorized and suitable version for use with the Event Wagering System. If Player Application validation fails, the application shall prevent player account access and wagering through the Player Application and provide indication of an error.

NOTE: The suitability of application validation methods will be evaluated by the independent test laboratory and approved by the regulatory body in accordance with recognized industry standards.
NOTE: This requirement does not apply to client-side graphics and audio files (e.g., wagering rules, help screens, etc.).

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4.2.5 Compatibility Verification

During any installation or initialization and prior to permitting player account access or wagering, the Player Application used in conjunction with the Event Wagering System shall detect any incompatibilities or resource limitations with the Remote Player Device that would prevent proper operation of the application (e.g., application version, minimum specifications not met, browser type, browser version, plug-in version, etc.). If device compatibility requirements are not met or resource limitations prevent proper operation, the application shall prevent player account access and wagering through the Player Application and provide indication of an error.

4.2.6 Integrity of Application Communications

The Player Application shall be designed or programmed to communicate only with authorized critical components through secure communications. If communication between the Event Wagering System and the Remote Player Device is lost, the application shall prevent player account access and wagering through the application and provide indication of an error. It is permissible for these conditions to be detected when the application or device tries to communicate with the system.

4.2.7 Application Security and Restrictions

To protect the security and integrity of the Remote Player Device, Event Wagering System, and associated functionality, the Player Application shall:

a) Not contain any malicious code or functionality deemed to be malicious in nature by the regulatory body, including, but not limited to, malware, unauthorized file extraction/transfers, unauthorized device modifications, and unauthorized access to any camera, microphone, location data, or locally stored personal information (e.g., contacts, calendar, etc.);
b) Prevent players from transferring data to one another, except through permitted chat functions (e.g., text, voice, video, etc.) or approved file transfers (e.g., user profile pictures, photos, etc.);
c) Not automatically disable virus scanners or detection programs or alter any device-specified firewall rules to open ports that are blocked by either a hardware or software firewall;
d) Not access any TCP/UDP ports (either automatically or by prompting the user to manually access) that are not necessary for the communication between the Remote Player Device and the server;
e) Ensure that any additional non-wagering functionality does not compromise the security or integrity of the Player Application or its regulated functionality;
f) Not override the volume settings of the Remote Player Device; and
g) Not store sensitive information in an unprotected manner.

4.2.8 Cookies

Where cookies are used, the player shall be informed of the cookie use upon Player Application access or during player registration. When cookies are required for event wagering, wagering cannot occur if they are not accepted by the Remote Player Device. All cookies used shall contain no malicious code.

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4.2.9 Information Access

In addition to the "Wagering Requirements" within this document, the Player Application shall be able to provide access to the required "Public Display Content", either directly from the player interface or from a page accessible to the player, including, but not limited to pages containing:

a) Wagering Rules;
b) Player Protection Information;
c) Terms and Conditions; and
d) Privacy Policies.

NOTE: During laboratory testing, the independent test laboratory shall ensure that the Player Application provides access to placeholder pages on which the Event Wagering Operation will be responsible to disclose the required "Public Display Content".

4.3 Geolocation Implementation

4.3.1 Geolocation Solution

Where required by the regulatory body, the Event Wagering System shall implement a Geolocation Solution provided in-house or by a third-party Geolocation Service Provider to obtain and verify the reliability of location data from a Remote Player Device and determine the player's real-world geographic location.

NOTE: The requirements of this section apply to the independent test laboratory's testing of the Geolocation Solution as implemented within the Event Wagering System, as part of the overall system evaluation or certification. Requirements pertaining to the evaluation of the Geolocation Solution itself and assessments of the Geolocation Service Provider are addressed in the "Geolocation Service Providers and Solutions" section of this document.
NOTE: The suitability of alternative location detection methods or technologies not addressed in this section will be evaluated by the independent test laboratory and approved by the regulatory body on a case-by-case basis in accordance with recognized industry standards.

4.3.2 Geolocation Triggering Actions

The Event Wagering System shall support, through configurable settings or built-in functionality, the identification of player actions that require a geolocation check before they can be accepted or completed. Geolocation checks shall be performed directly by the system or through communication with the Geolocation Solution and enforced for the actions specified by the regulatory body, which may include, where applicable, the following:

a) Accepting a paid wager where any of the following conditions apply:
    i. The player is placing their first paid wager after logging in from a specific Remote Player Device;
    ii. More than twenty minutes, or another period specified by the regulatory body, have elapsed since the player's last successful geolocation check; or
    iii. A change to the player's IP Address has been detected.

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b) Completing specific account-related or financial actions based on applicable risk-based controls, which may include where applicable:
   i. Creating a player account;
   ii. Updating registration information or account recovery information;
   iii. Changing authentication credentials;
   iv. Conducting large financial transactions (single and aggregate over a specific time period) exceeding an operation-established threshold not greater than any regulatory body-specified threshold; and
   v. Conducting the first financial transaction using a newly added or modified payment method.

NOTE: A previously successful geolocation check may satisfy a required check if it remains valid under the approved controls of the Geolocation Solution, unless the regulatory body requires a new check or a condition occurs that invalidates the previous result.
NOTE: The regulatory body may require more frequent geolocation checks for mobile connections based on the player's proximity to the permitted geofence boundary, using an assumed travel velocity of sixty-five miles per hour (one hundred and five kilometers per hour), or another velocity specified by the regulatory body.

4.3.3 Geolocation Checks, Logging, and Failures

For each geolocation check, the Event Wagering System shall initiate or facilitate a request to the Geolocation Solution that includes or is associated with the Remote Player Device's location data, a pseudonymized player identifier that does not directly reveal the player's identity, and any other information necessary to perform the check. Sufficient records shall be maintained to associate each geolocation check with the corresponding player account and Remote Player Device.

a) Each geolocation check and its result shall be recorded in one or more logs maintained by the Event Wagering Operation and/or Geolocation Service Provider. Together, these logs shall include, at a minimum:
   i. Unique player account ID or, for logs maintained by the Geolocation Service Provider, the corresponding pseudonymized player identifier;
   ii. The date and time of the geolocation check;
   iii. Relevant player access information (e.g., device identifier and type, application identifier and version, and connection type);
   iv. Relevant device location data; and
   v. Geolocation result, including the reason for any unsuccessful geolocation check.
b) A successful geolocation check shall be completed before the system accepts or completes the attempted triggering action.
c) A geolocation check shall be considered unsuccessful when any of the following conditions apply:
   i. The device's location cannot be reliably verified due to insufficient location data, inadequate accuracy, or other conditions affecting location verification;
   ii. Required location services, permissions, settings, configurations, or other functions are disabled, unavailable, unreliable, unsupported, or manipulated;
   iii. Fraud, tampering, spoofing, proxying, or other interference is detected that may compromise the reliability of the location determination; or
   iv. The device is determined to be outside the permitted geofence boundary when the regulatory body requires the triggering action (e.g., wager) to occur within that geofence.

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d) Upon an unsuccessful geolocation check, the system shall:
   i. Reject the attempted triggering action;
   ii. Notify the player that the attempted action cannot be accepted or completed due to an unsuccessful geolocation check; and
   iii. Prevent subsequent attempts to complete the triggering action until a successful geolocation check is completed.

4.3.4 Geolocation Data Sources and Cross-Validation

The Event Wagering System, in conjunction with the Geolocation Solution, shall determine the player's current real-world geographic location using location data obtained from or reliably associated with the Remote Player Device, either directly or through the Event Wagering System, based on the capabilities of the Player Application and Remote Player Device. Location data shall be cross-validated using multiple independent location data sources or supporting signals, where available and applicable, which may include:

a) Global Positioning System (GPS) or Global Navigation Satellite System (GNSS) data;
b) Wi-Fi and cellular network-based positioning;
c) Device sensor data;
d) Verified network infrastructure location information;
e) IP Address analysis, which shall not be used as the primary location data source for geolocation checks unless otherwise authorized by the regulatory body; and
f) Other reliable and authenticated location data sources determined to be suitable by the independent test laboratory and approved by the regulatory body on a case-by-case basis, in accordance with recognized industry standards.

NOTE: Where remote wagering occurs over a private network, such as a Wireless Local Area Network (WLAN), connection to that network alone shall not be sufficient to verify the Remote Player Device's location. Network-based positioning technologies, such as beacons, directional antennas, or similar technologies, may be used as supplementary location data sources or supporting signals, subject to the cross-validation requirements of this section.

4.3.5 Geolocation Beacon Technology

When beacons, such as short-range communication technologies, are used to assist in enforcing the permitted geofence:

a) The beacon's signal strength, broadcast range, and related settings shall be configurable or otherwise adjustable, as necessary, to establish and maintain the permitted geofence as accurately as reasonably practicable; and
b) Security tokens broadcast by the beacon shall be refreshed at intervals consistent with documented security requirements or as specified by the regulatory body. Expired tokens shall be invalidated to prevent reuse.

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4.3.6 Location Fraud Detection Testing

The independent test laboratory shall perform location fraud detection testing to assess the implementation of the Geolocation Solution with the Event Wagering System, including applicable Remote Player Devices and Player Applications.

a) Testing shall be conducted using a representative set of devices, operating systems, and connection types, as determined by the independent test laboratory and/or required by the regulatory body.
b) The independent test laboratory shall select tests on a case-by-case basis, considering the design, functionality, security mechanisms, and intended operating environment of the implementation, to assess the effectiveness of mechanisms designed to detect, prevent, or respond to location fraud, device or application compromise, or circumvention of geolocation controls. Testing shall include, as applicable, tests from the following categories:
    i. Geolocation Spoofing Detection Testing;
    ii. Virtual Private Network (VPN) Detection Testing;
    iii. Remote Desktop and Screen Mirroring Detection Testing;
    iv. Rooted or Jailbroken Device Detection Testing; and
    v. Virtual Machine and Emulator Detection Testing.

NOTE: The use of a Virtual Private Network (VPN) may be permitted when other reliable location data independently confirms the player's real-world geographic location.

4.3.7 Communication Security and Tampering Resistance Testing

The implementation of the Geolocation Solution within the Event Wagering System shall employ security mechanisms to protect the integrity of location data, geolocation requests, and geolocation results. At a minimum, the implementation shall be resistant to the following types of attacks:

a) Replay Attack: Previously valid location data or geolocation results shall not be capable of being reused or substituted for subsequent geolocation checks, including through network-based replay attacks or unauthorized manipulation of device-side geolocation responses.
b) Man-in-the-Middle (MITM) and Tampering Attack: Unauthorized interception, modification, injection, substitution, or manipulation of location data, geolocation requests, or geolocation results, including through communication-based attacks, device-side tampering, or code manipulation of the Player Application, shall not enable circumvention of geolocation controls.

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Chapter 5: Retail Wagering Terminal Requirements

5.1 Introduction

5.1.1 General Statement

The requirements of this chapter apply to the Retail Wagering Terminals used by the player to take part in wagers and financial transactions with the Event Wagering System within a Wagering Venue. A wager may be placed within a Wagering Venue using one of the following types of Retail Wagering Terminals as allowed by the regulatory body. Any other types of Retail Wagering Terminals will be evaluated by the independent test laboratory on a case-by-case basis and approved by the regulatory body.

a) Self-Service Wagering Terminal: A kiosk or other equipment that at a minimum will be used for the execution or formalization of wagers placed by a player directly and, if supported, may be used for redemption of wager records and other authorized activities.
b) Over-the-Counter (OTC) Wagering Terminal: A workstation or other equipment that at a minimum will be used by an attendant for the execution or formalization of wagers placed on behalf of a player and, if supported, may be used for redemption of wager records and other authorized activities.

NOTE: For Event Wagering Operations who offer retail wagering using attendant-controlled Remote Player Devices within a Wagering Venue, the "Remote Player Device and Application Requirements" shall apply.
NOTE: Upon request, or as required by the regulatory body, the independent test laboratory will conduct on-site testing for retail wagering at the Wagering Venue where the Event Wagering System, Retail Wagering Terminals, and related communications are set-up and tested, prior to and/or during implementation.

5.2 Retail Wagering Terminals

5.2.1 Retail Wagering Terminal Monitoring

The Event Wagering System shall be equipped to correctly process transactions, read and store the applicable significant events and transaction information, and specific meter values from the Retail Wagering Terminals, through secure communications.

5.2.2 Terminal Identification

The Event Wagering System shall uniquely identify each connected Retail Wagering Terminal. This unique identification number shall be utilized by the Event Wagering System to log and track all essential information pertaining to the corresponding Retail Wagering Terminal. Furthermore, the system shall prevent the duplication of these identification numbers to ensure the integrity and accuracy of the terminal tracking.

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5.2.3 Integrity of Terminal Communications

The Retail Wagering Terminal shall be designed or programmed to communicate only with authorized critical components through secure communications. If communication between the Event Wagering System and the Retail Wagering Terminal is lost, the terminal shall prevent further operations and display an appropriate error message. It is permissible for this error to be detected when the terminal tries to communicate with the system.

5.2.4 Wager Record Printers

If the Retail Wagering Terminal issues a printed record to the player, the wager record shall include information as indicated in "Wager Record" section of this document.

5.2.5 Terminal Transaction Requirements

The Event Wagering System and Retail Wagering Terminals may support the use of wagering instruments (vouchers and coupons) and/or cashless wagering, provided such transactions shall be processed accurately through secure communications. In addition, as applicable:

a) The issuance and/or redemption of wagering instruments shall meet the applicable "Validation System Requirements" of the *GLI-13 Standards for Monitoring and Control Systems and Validation Systems* and/or other applicable technical requirements observed by the regulatory body.
b) Wagering using funds from player accounts and/or electronic payment accounts shall meet the applicable "Cashless Device Requirements" of the *GLI-16 Standards for Cashless Systems and Technologies* and/or other applicable technical requirements observed by the regulatory body.

5.3 Self-Service Wagering Terminals

5.3.1 General Statement

A player places a wager at a Self-Service Wagering Terminal by using funds from their player account or by using peripheral devices as authorized by the regulatory body.

5.3.2 Kiosks as Self-Service Wagering Terminals

All proprietary components of the Self-Service Wagering Terminal shall meet the applicable "Kiosk Terminal Requirements" and "Kiosk Software Requirements" established within the *GLI-20 Standards for Kiosks* and other applicable technical requirements observed by the regulatory body.

5.3.3 Gaming Devices as Self-Service Wagering Terminals

Where Gaming Devices acting as Self-Service Wagering Terminals are permitted by the regulatory body, their proprietary components are not required to meet the requirements for Kiosks provided they meet the applicable "Gaming Device/Machine Requirements" established within the *GLI-11 Standards for Gaming Devices* and/or other applicable technical requirements observed by the regulatory body.

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5.3.4 Protection of Sensitive Information

The Event Wagering System shall ensure that sensitive information transmitted to or from a Self-Service Wagering Terminal is protected from unauthorized disclosure. The following information, where displayed through any display mechanism supported by the terminal, shall be masked so that no more than four characters are visible:

a) For wagers that have not yet been settled or redeemed, unique wager record IDs;
b) For wagers and financial transactions conducted using a player account, unique player account IDs; and
c) For wagers and financial transactions conducted using an electronic payment account, unique identifiers that disclose the account type, associated account information, or authentication details.

5.3.5 Wager Record Redemption Limits

If a player attempts to redeem a wager record and that redemption would exceed a redemption limit set by the Self-Service Wagering Terminal or Event Wagering System, an appropriate message shall be displayed to the player informing them that the wager record redemption was unable to be completed.

5.4 OTC Wagering Terminals

5.4.1 General Statement

A player places a wager at an OTC Wagering Terminal by using funds from their player account or by providing payment for the wager directly to the attendant.

5.4.2 Attendant Interface Requirements

The attendant interface is an interface application or program through which the attendant views and/or interacts with the OTC Wagering Terminal. The attendant interface shall meet the applicable "Player Interface Requirements" within this document.

NOTE: Access through the attendant interface shall meet the applicable "Workstation Access Controls" described within this document.

5.4.3 Touch Screen Displays

Touch screen displays, if in use by the OTC Wagering Terminal, shall be accurate, and if required by their design, shall support a calibration method to maintain that accuracy; alternatively, the display hardware may support automatic self-calibration.

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5.4.4 OTC Printer Requirements

If the OTC Wagering Terminal connects to a printer to produce printed wager records and/or wagering instruments, the printer and/or terminal shall be able to detect and indicate the following error conditions, where supported. It is permissible for the error condition to be detected when the terminal attempts to print:

a) Low battery (where power is external to the terminal);
b) Out of paper/paper low; and
c) Printer disconnected.

5.4.5 OTC Wager Record Handling

OTC Wagering Terminals used to settle, redeem, void, or cancel wagers shall meet the following technical requirements:

a) When wager records are presented for settlement, redemption, voiding, or cancellation at an OTC Wagering Terminal, the attendant shall scan the barcode (via a barcode reader or equivalent) or manually input the wager record ID and perform a verification with the Event Wagering System.
b) The Event Wagering System shall have the ability to identify and provide a notification to the OTC Wagering Terminal in the case of an invalid or unredeemable wager record for the following conditions:
    i. The wagering event has concluded, and the wager record is not a winner;
    ii. Early settlement, voiding, or cancellation is unavailable;
    iii. The wager record cannot be found on file or has expired;
    iv. The wager record has already been settled, redeemed, voided, or cancelled; or
    v. The value of the wager record differs from amount on file. This requirement can be met by display of wager record for confirmation by the OTC Wagering Terminal during the settlement, redemption, voiding, or cancellation process.
c) The OTC Wagering Terminal may issue a settlement, redemption, voiding, or cancellation receipt. If printed, the settlement, redemption, voiding, or cancellation receipt, at a minimum, shall contain the following information, as applicable:
    i. Unique wager record ID;
    ii. The date and time of settlement, redemption, voiding, or cancellation;
    iii. Total amount settled, redeemed, voided, or cancelled; and
    iv. Unique user account ID, unique terminal ID, or equivalent which settled, redeemed, voided, or cancelled the wager record.

5.4.6 Wireless OTC Wagering Terminals

For wireless OTC Wagering Terminals, the applicable requirements within the “Player Applications and Devices” section of the previous chapter shall also be met. Additionally, communication shall only occur between the wireless OTC Wagering Terminal and the Event Wagering System via authorized access points within the Wagering Venue.

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Chapter 6: Wagering Requirements

6.1 Introduction

6.1.1 General Statement

This chapter sets forth the technical requirements for information required to be made available regarding the wagering events, markets, and wager types available on the Event Wagering System, and the methods for placing a wager on the Wagering Platform.

6.2 Player Interface Requirements

6.2.1 Player Interfaces

The player interface is an interface application or program through which the player views and/or interacts with the Remote Player Device or Self-Service Wagering Terminal, including the touch screen, keyboard, mouse, button panel, or other forms of player interaction devices. The player interface shall meet the following requirements:

a) Where orientation changes, resizing, or overlays of the player interface screen are supported, such changes shall be mapped accurately to reflect the revised display and touch/click points or buttons.
b) All player-selectable touch/click points or buttons represented on the player interface screen that impact wagering activities shall be clearly labeled according to their function and shall operate as disclosed to the player.
c) There shall be no hidden or undocumented touch/click points or buttons anywhere on the player interface screen that impact wagering activities.
d) Wagering instructions, as well as information on the functions provided by the player interface, shall be clearly communicated to the player and not be misleading or inaccurate.

6.2.2 Adaptive Displays

The display of the wagering instructions and information shall be adapted to the player interface. For example, where a device or terminal uses technologies with a smaller display screen, it is permissible to present an abridged version of the wagering rules accessible directly from within the wagering screen and make available the full/complete version of the wagering rules via another method, such as a secondary screen, help menu, or other interface that is easily identified on the visual wagering screen.

6.2.3 Alternating Displays

Where multiple items of wagering instructions or information are displayed on the player interface, these items may be displayed in an alternating manner, provided that each item remains visible for a sufficient period to allow the player a reasonable opportunity to read it.

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6.2.4 Simultaneous Inputs and Outputs

Simultaneous or sequential activation of various inputs and outputs, including player interaction devices comprising a player interface, shall not, whether intentionally or not, cause wager malfunctions or invalid results.

6.3 Wagering Displays and Information

6.3.1 Posting of Wagering Rules

Comprehensive wagering rules shall be posted for the wagering events, markets, and wager types currently offered (moneyline, point spreads, over/under, win/place/show, parlay, etc.). Where the player interface includes these wagering rules directly, the software shall be evaluated against the requirements within the "Wagering Rules" section of this document.

6.3.2 Dynamic Wagering Information

The following information shall be made available to the player without the need for placing a wager. Within a Wagering Venue this information may be displayed by a Retail Wagering Terminal directly and/or by an external display:

a) Information regarding the available wagering events, markets, and wager types;
b) Current odds/payouts and prices for the available wagering events, markets, and wager types;
c) For pari-mutuel wagering:
    i. Up-to-date odds and/or estimated payouts for market pools. It is acceptable that, for complex pools, such estimates may be subject to reasonable limitations in accuracy;
    ii. Up-to-date total amounts wagered (pool totals) for each market pool; and
    iii. Declared dividends for settled markets.

NOTE: This information shall be displayed as accurately as possible within the constraints of communication delays and latencies.

6.3.3 Rakes, Commissions, and Fees

There shall be sufficient information available to the player regarding charges imposed on players or award payout adjustments such as a rake, commission, or fee taken by the Event Wagering Operation, as applicable. Any variation in the published information shall be disclosed to the player.

6.3.4 Maximum Payout Limits

Maximum payout limits may only be implemented through the wager prices offered before acceptance and shall not be applied to reduce the amount payable on an accepted winning wager.

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6.3.5 Event Wagering Jackpots

Where permitted by the regulatory body, outcomes of wagers may result in winning additional monetary awards or "jackpot payoffs" through progressive jackpots or incrementing bonus jackpots, which shall comply with the applicable requirements of the *GLI-19 Standards for Interactive Gaming Systems* (for remote wagering) and/or the *GLI-12 Standards for Progressive Jackpots* (for retail wagering), as follows:

a) Progressive jackpots increase according to the amounts wagered on the wagering event or market.
b) Incrementing bonus jackpots behave identically as progressive jackpots, except they increase based on the occurrence of one or more specific conditions established by the wagering rules instead of, or in addition to, increases based on amounts wagered.

NOTE: The offering of progressive jackpots and incrementing bonus jackpots within event wagering, shall meet the applicable requirements of the *GLI-19 Standards for Interactive Gaming Systems* (for remote wagering) and/or the *GLI-12 Standards for Progressive Jackpots* (for retail wagering).

6.4 Wager Placement

6.4.1 Placement of a Wager

The Wagering Platform shall clearly inform the player of all wagering events, markets, and wager types available for wagering on before the player commits to placing a wager. The following requirements apply to the selection and placement of a wager on the player interface:

a) The method of placing a wager shall be straightforward, with all wager selections (including their order, if relevant) identified. When the wager involves multiple wagering events or markets (e.g., parlays), such groupings shall be identified.
b) Players shall have the ability to select the wagering event, market, and wager selection they want to place a wager on.
c) Wagers shall not be automatically placed on behalf of the player without the player's consent/authorization.
d) Players shall have an opportunity to review and confirm their selections before the wager is submitted. This does not preclude the use of "single-click" wagering where permitted by the regulatory body and opted in by the player.
e) The Wagering Platform shall prevent multiple wagers from being placed that arise from communications errors or pressing the wager placement touch/click point or button repeatedly while awaiting a response from the platform.
f) Clear indication shall be provided that a wager has been accepted or rejected or when only part of the wager has been accepted, including the amount of the wager accepted and the odds/payouts accepted by the system.
g) When multiple wagers are placed at once, each wager shall be acknowledged and clearly indicated so that there is no doubt as to which wagers have been accepted.
h) Amounts wagered shall be deducted from the funds available for wagering when the wager is accepted by the system. A wager shall not be accepted if it would result in a negative account balance.

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6.4.2 Free Bet/Demo Mode

Free bet/demo mode allows a player to simulate wagering without paying, principally for the purpose of learning or understanding wagering mechanics. If the Wagering Platform supports a free bet/demo mode, the following requirements apply:

a) Free bet/demo mode shall accurately represent the normal operation of paid wagering. Free bet/demo mode shall not mislead the player about the odds/payouts available in the paid version;
b) Free bet/demo mode shall be clearly identified so a player knows at all times if/when this mode is active; and
c) Free bet/demo mode shall not update the player's funds available for wagering. Specific accounting is permissible for this mode provided the meters clearly indicate as such.

NOTE: This section does not otherwise restrict or apply to free-to-wager markets or other non-cash balance mechanics offered separately from free bet/demo mode. Additionally, paid wagers using credits received from a bonusing/promotional offer are not considered a part of free bet/demo mode.

6.4.3 Player Resource Feature

Unless prohibited by the regulatory body, a player resource feature may be offered that provides advice, hints, or suggestions to a player. An illustrative example might be a data stream that may be used to externally facilitate wager selection.

a) The player resource feature shall clearly describe to the player that it is available and any advantage it offers;
b) The method for obtaining the player resource feature and what options exist for selection shall be disclosed to the player.
c) Any player resource feature that is offered to the player for purchase shall clearly disclose the cost and benefit;
d) The player resource feature shall not be misleading or inaccurate, and shall reflect the rules in relation to this feature, while noting that the rules may change as a function of the resource offered, providing that any such changes are disclosed to the player prior to acceptance of the resource;
e) The player resource feature shall allow the player the option of accepting any assistance, and shall not force the player to accept the assistance unless it reflects the only possible option for the player to pursue at the time; and
f) The availability and content of the player resource feature shall remain consistent unless otherwise disclosed and shall not adapt in a way that disadvantages the player based upon prior wagers.

6.4.4 Changes During Fixed Odds Wager Placement

For fixed odds wagering, the Wagering Platform shall identify situations where the attributes of the associated wager selection (e.g., odds/payouts, prices, etc.) have changed prior to acceptance of the wager.

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a) If the revised wager selection is more favorable to the player, the wager may be accepted automatically, provided the player is notified of the updated values, and such functionality is clearly explained to the player.
b) If the revised wager selection is less favorable to the player, the wager shall not be accepted unless the player explicitly confirms acceptance of the updated values, unless the player has previously opted in to an auto-accept function for less favorable changes. Where this functionality is supported:
    i. The functionality and available auto-accept options shall be clearly explained to the player;
    ii. The player shall manually opt in to use this functionality (i.e., it shall not be enabled by default); and
    iii. The player shall be able to opt out at any time.

6.4.5 Condition-Based Wagering

Where allowed by the regulatory body, the platform may allow a player to specify an odds/payout or price condition, and/or any other conditions, related to a wagering event or market at which a qualifying wager will be automatically placed when the specified conditions are satisfied. Where this functionality is supported:

a) The functionality and available condition-based wager selections shall be clearly explained to the player;
b) The player shall be able to create and remove condition-based wager requests;
c) Player accounts shall reflect any funds held for pending condition-based wager requests;
d) All pending condition-based wager requests shall be displayed to the player; and
e) Where a player manually places a wager, any pending condition-based wager request for the same wager shall be cancelled.

6.4.6 Layoff Wagers

Where permitted by the regulatory body, a Wagering Platform may support layoff wagers received from external operators. Where layoff wagers are supported:

a) Each layoff wager shall be manually entered into the platform only by authorized personnel.
b) The platform shall provide a secure means for entering layoff wagers received from external operators and shall log each wager entry with a reference to the authorized personnel who performed the entry.
c) Each external operator placing layoff wagers shall be uniquely identified within the Wagering Platform, and each layoff wager shall be associated with the external operator from which the wager was received.

NOTE: For layoff wagers placed with external operators by authorized personnel, the Wagering Platform may be used to record the external layoff wager and adjust the risk analysis values stored and reported by the system.

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6.4.7 Wager Record

Upon placement of a wager, the player shall have access to a wager record which contains the following information, as applicable:

a) The date and time the wager was placed;
b) Each player choice involved in the wager:
   i. The description of the wagering event, market, and wager type (e.g., moneyline, point spreads, over/under, win/place/show, parlay, etc.);
   ii. Wager selection (e.g., athlete or team name and number) or combination of selections chosen, including selection names where practical;
   iii. The date and time the wagering event will be expected to occur, if known;
c) Odds/payouts applicable at the time the wager was placed;
d) Total amount wagered, separately indicating any bonusing/promotional amounts;
e) Any special conditions applying to the wager;
f) Unique wager record ID and/or barcode of the wager;
g) For a retail wager, unique terminal ID or equivalent which issued the wager record;
h) For a printed wager record, it is permissible for the following information to be contained on the ticket stock itself:
   i. Wagering Venue Name/Site ID; and
   ii. The redemption period.

NOTE: Some of the above-listed information may also be part of the unique wager record ID and/or barcode. Multiple barcodes are allowed and may represent more than just the unique wager record ID.

6.4.8 Wagering Period

The wagering period and cutoff for accepting wagers on a wagering event or market shall be clearly communicated to the player. It shall not be possible to place wagers once the wagering period for that wagering event or market has closed.

6.4.9 Wager Record Overrides

The Wagering Platform shall provide a mechanism for authorized personnel to settle, redeem, void, or cancel wagers. During each phase of the settlement, redemption, voiding, or cancellation process, the system shall update the wager record information accordingly.

6.5 Results and Payment

6.5.1 Results Display

Results entry shall include the entry of all information which may affect the results of all markets offered for that wagering event.

a) It shall be possible for a player to obtain the results of their wagers on any settled market once the results have been confirmed.
b) Wagers shall be settled in accordance with the wagering rules applicable to that wagering event, market, and wager type.

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c) The Wagering Platform shall facilitate the ability to retrieve recorded market results on any completed market for a period of time as described in the wagering rules.
d) The Wagering Platform shall be able to modify a recorded market result when circumstances permit until the result has been confirmed.
e) When a recorded market result has been modified (e.g., due to statistics/line corrections), the changes to the results shall be made available.
f) For pari-mutuel wagering, the dividends on any completed market shall be made available, including any new dividends calculated based on any changed results.

6.5.2 Early Settlement Feature

The Wagering Platform may offer a feature for the player to perform an early settlement of their wager for an adjusted payout before the wagering event's conclusion. The early settlement feature shall only be supported for wagers comprised entirely of wager selections designated as eligible for early settlement, whether that designation occurs prior to or after the wager is placed. Availability of early settlement may be modified or withdrawn at any time.

a) The early settlement feature shall clearly describe to the player that it is available, and any rules or conditions relevant to the early settlement feature, to enable the player to make an informed decision as to whether to request early settlement.
b) Wagers that are eligible for early settlement shall be clearly indicated along with an adjusted payout amount. The adjusted payout amount will depend on the current state of the wagering event and the time elapsed and may be higher or lower than the original amount of the wager.
c) The Wagering Platform may allow a player to specify an adjusted payout threshold or other specified conditions related to a wagering event or market at which early settlement for a qualifying wager will be automatically processed when such threshold or conditions are met or exceeded.
    i. The player shall be able to create and remove condition-based settle requests.
    ii. All pending condition-based settle requests shall be displayed to the player.
    iii. Where a player manually executes an early settlement, any pending condition-based settle requests associated with that wager shall be cancelled.
d) If the early settlement is processed, a confirmation message shall be displayed, and the wager shall be settled for the adjusted payout amount. Subsequent wagering event results shall not affect the settled wager or its payout amount.
e) If early settlement has not occurred before the market result is confirmed, the wager shall be settled based on the confirmed market result.
f) Where an early settlement is issued in error, there shall be a mechanism to void the early settlement and settle the original wager normally based on the final market result using the correct odds/payouts.

6.5.3 Wager Redemption

Eligible Wagers shall be available for redemption and payment once the results of the market have been entered and confirmed, or early settlement has been processed.

a) For account-based wagers, the wager record shall be automatically redeemed and the amounts paid shall be added to the player account balance, except for merchandise prizes and large wins or payouts as required by the regulatory body.

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b) For anonymous wagers, the wager record can be redeemed at any Retail Wagering Terminal that supports wager record redemption provided that no amounts shall be paid to the player until the validity of the wager record has been confirmed and its status has been properly updated in the Event Wagering System.

6.6 Peer-to-Peer (P2P) Wagering

6.6.1 P2P Wagering

Peer-to-Peer (P2P) wagering allows players to wager with and against one another, typically without the Event Wagering Operation acting as a wagering party. The operation may facilitate such wagering and collect a rake, commission, or fee for the service. The following requirements apply:

a) Players shall be prevented from competing against themselves unless permitted by the applicable wagering rules;
b) Information regarding individual wagers, wager selections, or other wagering activity shall not be accessible in a manner that provides an unfair advantage, except to the player to whom the information pertains or as otherwise permitted by the applicable wagering rules;
c) Players shall be provided with sufficient information and appropriate warnings regarding player resource features or unauthorized player assistance methods that may provide other players with an unfair advantage, enabling them to make an informed decision about participation; and
d) Players shall be explicitly informed on the wagering screen when competing against sponsored players.

6.6.2 Pot/Pool Display

Where players are competing for a specific pot or pool, the pot or pool amount for which they are competing shall be clearly displayed to each player and shall be updated each time a wager is placed or whenever the pot or pool amount otherwise changes in accordance with the applicable wagering rules.

6.6.3 Reporting Suspicious Players

Players shall be provided with a mechanism to report suspected cheating, collusion, or the use of unauthorized player assistance methods by other players to gain an unfair advantage.

6.7 Exchange Wagering

6.7.1 General Statement

Exchange wagering involves two or more players placing identically opposing wagers, allowing players to wager on both winning and non-winning results in the same wagering event or market.

6.7.2 Market Maker Wagers

The Wagering Platform shall clearly disclose the presence of wagers for sale or for purchase by, or posted on behalf of, a market maker.

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6.7.3 Wager Formalization

A wager to back or lay a particular wager selection in a given market, specifying the odds/payouts and prices of the wager, shall be placed directly with the Event Wagering Operation by the player. The Wagering Platform shall:

a) Only formalize a wager upon the successful matching of the pending wager;
b) Allow pending wagers to be modified or cancelled prior to matching;
c) Automatically cancel unmatched pending wagers upon expiry or wagering period closure; and
d) Ensure that once a pending wager is matched to identically opposing wagers, it is final and shall not be cancelled except as permitted by the wagering rules or the regulatory body.

6.7.4 Best Execution

The Wagering Platform shall match pending wagers using a "best execution" methodology, ensuring wagers are matched at the most favorable odds/payouts available that are equal to or better than those requested by the player. The Wagering Platform shall:

a) Support full or partial matching of pending wagers to identically opposing wagers;
b) Continue matching any unmatched portion at the most favorable odds/payouts until fully matched or no qualifying opposing wagers remain;
c) Prioritize matching based on odds/payouts and time of submission;
d) Treat any modification to a pending wager, including changes to wager amount, as a new wager for matching priority;
e) Not apply any undisclosed margin between matched wagers; and
f) Provide players the option to display available exchange wagering liquidity at the most favorable odds/payouts, including the opposing wagers available for matching.

6.7.5 Live Exchange Wagering Delays

For exchange wagering involving live-event wagers, the Wagering Platform shall apply a delay before pending wagers are accepted and matched.

a) The delay shall ensure fair and equitable treatment of players across different access channels.
b) Wagers submitted during the delay period shall not be accepted or matched until the delay has elapsed.
c) The delay shall not apply to the cancellation of unmatched pending wagers.

6.8 Virtual Event Wagering

6.8.1 General Statement

Virtual event wagering involves the placement of wagers on simulations of computer-generated wagering events, or on previously recorded wagering events, as authorized by the regulatory body. The requirements of this section shall apply to virtual event wagering in addition to the other applicable requirements of this chapter. Nothing in this section should be interpreted as being applicable to wagering on live, real-world wagering events.

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6.8.2 Virtual Wagering Event Randomization

A virtual wagering event may utilize the random properties of a cryptographically strong RNG or equivalent to determine or influence the results of the virtual wagering event, contributing event elements, or sequences of event elements, in which case, the applicable requirements specified in the "Random Number Generator (RNG) Requirements" chapter and the "Game Outcome Using a Random Number Generator (RNG)" section of the *GLI-19 Standards for Interactive Gaming Systems* (for remote wagering) and/or the *GLI-11 Standards for Gaming Devices* (for retail wagering) shall be met.

NOTE: Implementations of virtual event wagering which do not rely on the use of an RNG will be evaluated by the independent test laboratory on a case-by-case basis.

6.8.3 Virtual Wagering Event Display and Fairness

Virtual wagering events shall conform to applicable "Game Fairness" requirements within the *GLI-19 Standards for Interactive Gaming Systems* (for remote wagering) and/or the *GLI-11 Standards for Gaming Devices* (for retail wagering), along with the following requirements:

a) Statistics/line data that is made available to the player pertaining to the virtual wagering event shall not misrepresent the capabilities of any virtual participant. Depending on the type of virtual wagering event, this does not prevent the use of an element of chance or randomness from impacting performance of the virtual participant during the virtual wagering event as provided for by design.
b) It shall not be possible to ascertain the results of the virtual wagering event prior to its commencement.
c) For scheduled virtual wagering events, a countdown of the time remaining to place a wager in that event shall be displayed to the player. It shall not be possible to place wagers on the event once this time has passed; however, this requirement does not prohibit the implementation of live-event wagers depending on the type of virtual wagering event.
d) After the commencement of a virtual wagering event, no further actions or decisions may be made that change the behavior of any of the elements of chance within the virtual wagering event, other than player decisions.
e) Each virtual participant shall be unique in appearance, where applicable to the wager. For instance, if the wager is on one team to beat another, the virtual participants themselves do not need to be unique in appearance, however the teams that they are on shall be visually distinct from each other.
f) The results of a virtual wagering event shall be clear, unambiguous, and displayed for a sufficient length of time to allow a player a reasonable opportunity to verify the outcome of the wagers related to that virtual wagering event.

6.8.4 Virtual Wagering Event Recall

All information necessary to adequately reconstruct the virtual wagering events, including the virtual wagering event results and/or virtual participant actions, shall be recorded by the Wagering Platform or associated equipment, using some combination of text, logs, video, graphics, screen captures, or other means (e.g., "flight recorder" mechanism).

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6.8.5 Remote Wagering on Virtual Wagering Events

For remote wagering on virtual wagering events, the Player Application shall not contain any logic that unilaterally generates the results of any virtual wagering event. All critical functions including the generation of any virtual wagering event results shall be generated by the Event Wagering System and be independent of the Remote Player Device.

6.9 External Wagering Platforms

6.9.1 General Statement

This section contains requirements for circumstances where the Wagering Platform communicates with an External Wagering Platform in either of the following configurations:

a) As a "Host Wagering Platform," receiving wagers for its wagering events and markets from one or more external "Guest Wagering Platforms"; or
b) As a "Guest Wagering Platform," passing wagers to one or more external "Host Wagering Platforms" for those platforms' wagering events and markets.

NOTE: The requirements of this section apply to the interoperability of the Wagering Platform with an External Wagering Platform and do not constitute a complete evaluation of the External Wagering Platform. The External Wagering Platform may independently be subject to evaluation by the independent test laboratory at the discretion of the regulatory body.

6.9.2 Communications with External Wagering Platforms

The following requirements apply to information conveyed between the Host Wagering Platform and the Guest Wagering Platform:

a) Authentication shall occur between the Host Wagering Platform and the Guest Wagering Platform prior to conducting transactions.
b) The correct delivery of wagers shall not be affected by characteristics of the communication channel such as bandwidth, delay, bit error rate, and link utilization.
c) Wagering activities shall be correctly processed and reconciled. Incomplete or indeterminate wagering activities resulting from the following circumstances shall be identified and appropriately resolved or reversed:
    i. Communication is lost between the Host Wagering Platform and the Guest Wagering Platform.
    ii. Extended communication delays occur between the Host Wagering Platform and the Guest Wagering Platform. Manual resolution or reversal is permitted, provided that reports identify incomplete or indeterminate wagering activities to the Event Wagering Operation.
d) If the Host Wagering Platform provides fixed odds wagering for the Guest Wagering Platform where the odds/payouts and prices can be dynamically changed, the Wagering Platform shall be able to:
    i. As a Guest Wagering Platform, receive current odds/payouts and prices from the Host Wagering Platform whenever they change.
    ii. As a Host Wagering Platform, pass current odds/payouts and prices to all receiving Guest Wagering Platforms whenever they change.

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e) If the Host Wagering Platform provides pari-mutuel wagering for the Guest Wagering Platform, the Wagering Platform shall be able to:
   i. As a Guest Wagering Platform, receive current pool information and estimated dividends for active pools from the Host Wagering Platform.
   ii. As a Host Wagering Platform, pass current pool information and estimated dividends for active pools to all receiving Guest Wagering Platforms.
f) Changes to wagering event or market status information shall be passed from the Host Wagering Platform to the Guest Wagering Platform when they occur, including:
   i. Withdrawn or reinstated wager selections;
   ii. Altered wagering event starting time;
   iii. Wagering period for markets opened or closed;
   iv. Results entered or modified;
   v. Results settled; and
   vi. Wagering event or market cancelled.

6.9.3 External Wager Placement

The following requirements apply to wagers placed between the Host Wagering Platform and the Guest Wagering Platform:

a) Wagers passed from the Guest Wagering Platform to the Host Wagering Platform shall include the wager amount and the expected odds/payouts presented to the player at the time the wager is placed.
b) The Host Wagering Platform shall accept or reject wagers based on the status of the wagering event or market when the wager is received, rather than when it is placed on the Guest Wagering Platform.
c) If the wager price is obtained from the Host Wagering Platform before submission, the Guest Wagering Platform shall obtain the price before the player confirms the wager.
d) For fixed odds wagering, any difference between the expected odds/payouts submitted by the Guest Wagering Platform and the odds/payouts currently established by the Host Wagering Platform shall be handled in accordance with the "Changes During Fixed Odds Wager Placement" section.
e) The Host Wagering Platform shall send the Guest Wagering Platform clear acknowledgment of each wager, including the following details, as applicable:
   i. The accepted odds/payouts;
   ii. Any partial wager acceptance, including the amount accepted; and
   iii. The total wager amount.
f) Where wagers may be placed in bulk, the following requirements apply:
   i. If the stream of wagers is interrupted, there shall be a means to determine where the interruption occurred.
   ii. If a wager in the stream cannot be accepted due to insufficient funds available for wagering, processing of the stream shall be halted.
g) The wager amount submitted to the Host Wagering Platform shall be held pending acknowledgment from the Host Wagering Platform, and details of the wager shall be logged. Upon acknowledgment, the Guest Wagering Platform shall appropriately debit, release, or adjust the held amount based on whether the wager was accepted, rejected, or partially accepted.

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6.9.4 External Wager Cancellations and Voids

Cancellation and void requests from the Guest Wagering Platform shall receive clear acknowledgment of acceptance or rejection from the Host Wagering Platform.

a) If the cancellation or void is rejected, the reason shall be forwarded from the Host Wagering Platform to the Guest Wagering Platform and then to the player.
b) The player shall not be credited by the Guest Wagering Platform for a cancelled or voided wager until final confirmation, including the amount cancelled or voided, is received from the Host Wagering Platform.

6.9.5 External Wager Settlement

When results are entered and confirmed on the Host Wagering Platform, or received from another Host Wagering Platform, settlement information for each wager placed through a Guest Wagering Platform shall be transferred to the Guest Wagering Platform, including the amount to be paid, as applicable.

a) Receipt of the settlement information shall be acknowledged by the Guest Wagering Platform.
b) Wager redemption shall be handled by the Guest Wagering Platform in accordance with the "Wager Redemption" section of this chapter.

6.10 Spectator Wagering Requirements

6.10.1 Spectator Wagering

Where authorized by a regulatory body, the following requirements apply to spectator wagering where a spectator player's wagering activities are tied to the host player's wagers on wagering events. The requirements of this section shall apply to spectator wagering in addition to the other applicable requirements of this chapter and the applicable "Spectator Wagering Requirements" in the *GLI-19 Standards for Interactive Gaming Systems*.

a) The player interface shall clearly indicate to the spectator player when their wagers, wager selections, and/or outcomes are based on the host player's wagering activities.
b) Spectator players shall have the same access to the wagering rules, and the same odds/payouts and prices for the host player's wager as they would if placing the wager themselves.
c) The complete wager information for the host player's unsettled wagers, as specified in "Wager Record" section of this standard, shall be accessible to all spectator players.
d) For linked wagering, spectator players shall be able to choose whether to automatically perform early settlement of their linked wagers whenever the host player performs early settlement of the corresponding wagers before the wagering event concludes.
e) For performance-based wagering, wagers shall only be placed before any contributing host player's wagers have settled.

NOTE: For spectator wagering where a spectator player's gaming activities are tied to the host player's gameplay, please refer to the "Spectator Wagering Requirements" in the *GLI-19 Standards for Interactive Gaming Systems*.

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Appendix A: Internal Control Procedures

A.1 Introduction

A.1.1 General Statement

This appendix sets forth internal control procedures applicable to the Event Wagering Operation which will be reviewed in an internal controls audit, including, but not limited to establishing wagering rules, suspending events, handling various wager and financial transactions, creating markets, settling wagers, closing markets, cancellations of events, voiding or cancelling wagers, player account management, fundamental practices relevant to the limitation of risks, and any other objectives established by the regulatory body. It is also recognized that additional procedures which are not specifically included within this standard will be relevant and required for an internal controls audit as determined by the Event Wagering Operation and/or regulatory body within their rules, regulations, and Minimum Internal Control Standards (MICS).

NOTE: This appendix is not intended to assign responsibilities to specific entities involved in the Event Wagering Operation. Requirements applicable to the operation may be satisfied by the operator, its suppliers, service providers, or a combination thereof, through the technological capabilities of the Event Wagering System and/or established internal control procedures, according to their respective responsibilities. Such arrangements do not alter the regulatory accountability of any party under applicable regulatory requirements.

A.2 Internal Control Procedures

A.2.1 Internal Control Procedures

Internal control procedures governing event wagering, including the performance of wager and financial transactions, shall be established, maintained, implemented, and complied with as part of the Event Wagering Operation.

A.2.2 Information Management

The Event Wagering Operation's internal control procedures shall include the processes for maintaining the recorded information specified under the section entitled "Information to be Maintained", and other logs or records required by this standard unless specified otherwise, for a documented retention period consistent with applicable regulatory requirements.

A.2.3 Risk Management

The Event Wagering Operation's internal control procedures shall contain details on its risk management framework, including but not limited to:

a) Automated and manual risk management procedures;
b) Personnel management, including access controls and segregation of duties;
c) Information regarding identifying and reporting fraud and suspicious conduct;
d) Controls ensuring the integrity of event wagering and compliance with applicable regulatory requirements;

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e) Description of Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) compliance program;
f) Description of all software applications that comprise the Event Wagering System;
g) Description of all forms of event wagering available to be offered by the operation;
h) Description of all integrated Third-Party Service Providers; and
i) Any other information required by the regulatory body.

A.2.4 Use of Third-Party Service Providers

The Event Wagering Operation's internal control procedures shall describe the operation's governance framework for the use and oversight of Third-Party Service Providers supporting regulated functions of the Event Wagering System, including the processes used to evaluate, monitor, and manage such providers and ensure that associated system interfaces, controls, and operational procedures function in accordance with applicable regulatory requirements.

a) The operation shall maintain records identifying each Third-Party Service Provider and describing the services provided to the operation (e.g. payments, know-your-customer, geolocation, etc.).
b) The operation shall have processes to identify and flag interruptions or failures of third-party services supporting regulated functions of the system. Such incidents shall be recorded in a log containing the date and time of occurrence, duration, nature, impact on system performance, and resolution if resolved.

NOTE: The use of Third-Party Service Providers does not relieve the Event Wagering Operation of its responsibility to comply with applicable regulatory requirements.

A.2.5 Prohibited or Restricted Persons

The Event Wagering Operation's internal control procedures shall address instances in which a player is identified as being prohibited or restricted from wagering under any of the following circumstances:

a) Where required by the regulatory body, the player is identified as an employee, subcontractor, director, owner, or officer of the operation, or a member of the same household, and is wagering with that operation on any wagering events, except when using a clearly marked test account for testing purposes.
b) The player is identified as any of the following:
    i. Underage, or using the PII of a deceased individual;
    ii. On any time-out or suspension lists maintained by the operation;
    iii. On any exclusion lists that may be provided or recognized by the regulatory body;
    iv. Placing wagers on behalf of another person, unless authorized by the regulatory body; or
    v. Prohibited from event wagering for any other reason.
c) The player is identified as a professional or collegiate athlete, team employee or owner, coach, manager, handler, athletic trainer, league official or employee, referee, umpire, sports agent, employee of a player or referee union, or a member of the same household, who is wagering on any sporting event or game, competition, contest, match, race, or other occurrence or type of activity in which they participate, the athlete they represent participates, or for which they may have insider information.

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A.2.6 Workstation Access Controls

The Event Wagering Operation's internal control procedures shall include controls for securing workstations used to perform regulated functions of the Event Wagering System, including procedures to ensure that:

a) Access to workstations is controlled by a secure logon procedure or other authorized secure process to ensure that only authorized personnel are allowed access.
b) Configuration settings shall not be modified without an authorized secure process.
c) If user sessions are supported by the workstation:
    i. A user session is initiated by the individual logging in to their user account using their secure username and password or other authentication credentials allowed by the regulatory body.
    ii. All available options presented to the individual are tied to their user account.
    iii. User sessions shall be subject to documented inactivity controls specifying the period of inactivity after which a user session times out or locks for each applicable type of workstation, and the authentication required to resume the session.
    iv. Repeated failed access attempts shall be subject to documented account lockout controls specifying the number of failed attempts that trigger a lockout, the period over which such attempts are measured, the duration of the lockout, and, where supported, any mechanism for automatically releasing the account.

NOTE: For workstations where one or more of the controls above are not technically or operationally appropriate, alternative technical or operational access controls may be used, provided they effectively restrict access to authorized personnel and provide a level of protection commensurate with the workstation and associated risk.

A.2.7 Test Accounts

The Event Wagering Operation may establish test accounts to be used to test the various components and operation of an Event Wagering System in accordance with internal control procedures adopted by the operation, which, at a minimum, shall address procedures for:

a) Authorizing testing activity and assigning each test account for use;
b) The issuance and segregation of funds used for testing, including the identification of who is authorized to issue the funds, the maximum amount of funds that may be issued, and the purpose for which the issued funds may be used;
c) Maintaining a record for all test accounts, to include when they are active and to whom they are issued; and
d) Auditing testing activity to ensure the accountability of funds used for testing and proper adjustments to reports and records.

A.2.8 Responsible Gaming Plan

The Event Wagering Operation shall establish and maintain a responsible gaming plan containing policies and procedures to promote responsible gaming. The operation shall maintain evidence that the relevant policies and procedures were followed and present such evidence to the regulatory body upon request. The responsible gaming plan shall include:

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a) Measures and processes to detect and identify potential indicators of gambling-related harm or elevated risk. Such measures and processes may include analytical tools, behavior monitoring mechanisms with pre-designed and/or evolving parameters, player facing controls, and review by relevant personnel.
b) Policies and procedures governing the actions that may be taken by the operation with respect to activity or communications that may indicate potential gambling-related harm or elevated risk. Such policies and procedures may include appropriate player interaction, intervention, or other responsible gaming measures.
c) Recordkeeping of responsible gaming reviews or investigation conducted with respect to a player, any actions or decisions taken pursuant to the operation's responsible gaming policies and procedures, and relevant player interactions. Such records shall provide a clear and detailed audit trail and be made available to the regulatory body upon request.
d) Responsible gaming training upon hire and regularly thereafter for personnel responsible for responsible gaming-related matters and, as applicable, player interaction.
    i. The operation shall keep a record of the personnel required to complete the training, the type and frequency of training, and the responsible gaming training and testing undertaken.
    ii. Personnel shall be trained to recognize activity or communications that may indicate potential gambling-related harm or elevated risk and respond in accordance with the operation's responsible gaming policies and procedures.
e) Applicable standards of socially responsible advertising, including compliance with all observed rules and regulations, and encouraging affiliates, which may include content providers, social media influencers, social media accounts, and brand ambassadors, to also adhere to these standards.
f) Procedures for evaluating and continuously monitoring the responsible gaming plan and initiatives.

NOTE: The regulatory body may choose to require an independent third-party evaluation of the Event Wagering Operation's responsible gaming plan against the applicable controls of this appendix, recognized industry standards for responsible gaming, and any additional requirements specified by the regulatory body.

A.3 General Operating Procedures

A.3.1 Operational Reserves and Protection of Player Funds

The Event Wagering Operation shall maintain and protect adequate reserves, as determined by the regulatory body, to cover player funds and other operational liabilities. Additionally, the Event Wagering Operation shall:

a) Ensure that player funds are held either in trust for the player in a segregated account or in a special-purpose segregated account maintained and controlled by a properly constituted corporate entity that is independent of the operation and any related or controlled corporation, and whose governing board includes one or more independent directors; and
b) Establish and maintain procedures reasonably designed to safeguard and account for player funds and prevent the commingling of player funds held in a segregated account with other funds, including funds of the operation.

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A.3.2 Taxation

Where the jurisdiction has taxation laws and regulations, the Event Wagering Operation shall establish and maintain documented procedures to identify payouts subject to taxation (single payouts or aggregate payouts over a specific time period, as required) and ensure that any required tax documentation is completed before the applicable payout is made.

A.3.3 Complaint/Dispute Process

The Event Wagering Operation shall provide the means for a player to make a complaint/dispute, and to enable the player to notify the regulatory body if such complaint/dispute has not been or cannot be addressed by the operation, or under other circumstances as specified by the law of the regulatory body.

a) Players shall be able to log complaints/disputes on a 24/7 basis.
b) Records of all correspondence relating to a complaint/dispute shall be maintained by the operation for a documented period consistent with applicable regulatory requirements.
c) A documented process shall exist between the operation and the regulatory body on the complaint/dispute reporting and resolution process, with response times and escalation to an independent external channel where the regulatory body provides one.

A.3.4 Chat Features

Procedures shall exist for cases where the Event Wagering Operation provides for the use of chat features which allow the player to communicate directly with the operation and/or other players.

a) The operation shall maintain chat logs and email correspondence between the player and the operation for a documented period consistent with applicable regulatory requirements;
b) When a player interacts with a chatbot or virtual assistant:
    i. The player shall be clearly notified that they are interacting with a chatbot or virtual assistant, not a human;
    ii. The player shall be able to request to interact with a human representative, and the operation shall make contact information or such functionality reasonably accessible to the player; and
    iii. The operation shall implement a process for the human review of interaction logs between the player and the chatbot or virtual assistant at documented intervals consistent with applicable regulatory requirements, which assesses the chatbot's or virtual assistant's performance for accuracy, sentiment, and adherence to the operation's internal control procedures.

A.3.5 Personally Identifiable Information (PII) Security

Any personally identifiable information (PII) and funds-related information with respect to a player, including player account IDs, authentication credentials, wagering activity, financial transactions, and account balances, shall be handled in compliance with the Event Wagering Operation's privacy policy and applicable data privacy and security laws, regulations, and standards observed by the regulatory body.

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a) PII and funds-related information shall be kept confidential and disclosed only where authorized by the privacy policy or required or permitted by the regulatory body.
b) The operation shall have procedures for the security and authorized sharing of PII and funds-related information, consistent with applicable regulatory requirements, including, but not limited to:
   i. The designation of a role or function having primary responsibility for the design, implementation, and ongoing evaluation of such procedures;
   ii. The nature and scope of all information collected, the locations in which it is stored, and the servers or storage devices which may be used for storage or transfer;
   iii. Measures to protect such information from unauthorized access, including monitoring to identify and flag suspected compromise; and
   iv. Procedures for responding to a data security breach, including notification to the regulatory body where required.

A.3.6 Payment Processing and Protection

The following controls shall be implemented to ensure the security, integrity, and reliability of payment processing and financial transactions:

a) All financial transactions shall comply with applicable commerce regulations and requirements specified by the regulatory body.
b) Collection of sensitive information directly related to financial transactions shall be:
   i. Limited to information necessary for payment processing and applicable regulatory requirements; and
   ii. Protected against unauthorized access, alteration, or disclosure in accordance with applicable regulatory requirements and recognized industry standards.
c) Records of financial transactions shall:
   i. Support transaction traceability through unique transaction identifiers;
   ii. Exclude unnecessary sensitive information;
   iii. Be protected against unauthorized access, modification, deletion, or loss through appropriate security, backup, and recovery controls; and
   iv. Be reconciled at documented intervals to identify, investigate, and resolve discrepancies in accordance with applicable regulatory requirements.
d) Payment processing shall be monitored to identify errors, failures, interruptions, and suspicious player activity affecting financial transactions and flag them for investigation.

NOTE: The regulatory body may choose to require an independent third-party evaluation of the Event Wagering Operation's use of a Payment Processor against the applicable controls of this appendix, recognized industry standards for the payment methods processed, and any additional requirements specified by the regulatory body.

A.3.7 Geolocation Solution Oversight

Where Geolocation Solutions are used, the Event Wagering Operation shall maintain documented policies and procedures governing their use. The following shall apply:

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a) The operation shall have procedures to identify available Geolocation Solution updates and patches, receive notifications of their availability, and verify that the latest approved versions are deployed, subject to applicable change management and certification requirements.
b) Where a secondary Geolocation Solution is used, the operation shall maintain documented criteria, approved by the regulatory body, defining the circumstances under which switching between Geolocation Solutions is permitted. The operation shall:
   i. Maintain logs documenting each switch and the corresponding reason; and
   ii. Periodically review switching events to verify compliance with the approved criteria.
c) Any internal geolocation logic applied before submitting requests to a Geolocation Solution shall be formally documented, approved, and designed to maintain compliance with applicable regulatory requirements.

NOTE: The regulatory body may choose to require an independent third-party evaluation of the Event Wagering Operation's use of a Geolocation Solution against the applicable controls of this appendix, recognized industry standards for geolocation, and any additional requirements specified by the regulatory body.

A.4 Public Display Content

A.4.1 Public Display Content

Public display content refers to any written, graphical, and auditory information provided to the public regarding event wagering.

a) Public display content shall be complete, unambiguous, and not misleading or unfair to the player.
b) Public display content that is presented aurally (via sound or voice) shall also be displayed in written form.
c) Public display content shall be rendered with sufficient font size and clarity in a color that contrasts with the background color to ensure that all information is clearly visible/readable.
d) Public display content shall contain the same information and carry the same meaning across all languages it is provided in.
e) The Event Wagering Operation shall keep a log of any changes to the public display content.

NOTE: Within a Wagering Venue this content may be displayed by a Retail Wagering Terminal directly and/or by external signage, forms, or brochures available.

A.4.2 Wagering Rules

The Event Wagering Operation shall adopt and adhere to comprehensive wagering rules that shall be made available to the player through the terms and conditions, wager-specific rules/help screens, or other applicable player interfaces or displays. Changes to wagering rules that affect wager placement, acceptance, settlement, or payment shall be date and time stamped and applied prospectively. The rules in effect when a wager is accepted shall govern that wager unless otherwise required by the regulatory body. The wagering rules shall address, as applicable:

a) Accepted payment methods (e.g., cash, personal check, cashier's check, wire transfer, money order, debit instrument, electronic payment account);

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b) Where allowed by the regulatory body, awards offered in the form of merchandise prizes, annuities, lump-sum payments, or payment plans instead of cash payouts;
c) Procedures for addressing:
   i. Unrecoverable hardware or software malfunctions, including whether the process results in the voiding or cancelling of any wagers;
   ii. Interruptions caused by a discontinuity of data flow from the network server during an event;
d) Rules of participation, including wagering eligibility and scoring criteria, available wagering events and markets, accepted wager types, line postings, advertised awards, and the effect of schedule changes;
e) Payout information, including possible winning positions, rankings, and achievements and their corresponding payouts for available wager selections;
f) Any non-wager purchase options, including the item or entitlement (cosmetic items, display customization options, etc.) and its price;
g) Any wagering restrictions, including wager limits and maximum payouts;
h) A description on prohibited or restricted persons, including any applicable limitations on wagering for restricted persons (e.g., athletes shall not wager on their team);
i) Procedures for handling incorrectly posted events, markets, odds/payouts, prices, wagers, or results;
j) Wager voiding and cancellation policy, including:
   i. Definitions and procedures for voids and cancellations involving obvious errors or material changes in circumstances affecting a wagering event, market, or wager selection;
   ii. The treatment of wagers involving multiple wagering events or markets (e.g., parlays), including where one or more legs are cancelled, suspended, or withdrawn;
   iii. Any restrictions or prohibitions on voiding or cancelling wagers, including after a specified period;
k) Whether the odds/payouts are locked-in at the time of the wager, or if the odds/payouts may change dynamically prior to the commencement of the event and the method of indicating to the player any changes to the odds/payouts;
l) For fixed odds wagering, any situations where the odds/payouts may be adjusted such as atypical winning results (e.g., dead heats), cancelled legs of wagers with multiple wagering events or markets (e.g., parlays), and prorating;
m) For pari-mutuel wagering, rules governing dividend calculations, including the prevailing formula for pool allocations and the stipulations of the event being wagered upon, as approved by the regulatory body;
n) For live-event wagering, disclosure that, due to varying communication speeds or broadcast transmission latencies:
   i. The information displayed to a player may be delayed, potentially placing the player at a disadvantage relative to others with more current information;
   ii. Delays may be incorporated into the registered time of a live-event wager to prevent past-post wagering, voids, or cancellations;
o) A statement that the operation reserves the right to:
   i. Refuse any wager or part of a wager, or reject or limit wager selections before acceptance, for reasons disclosed to the player in the wagering rules;
   ii. Accept a wager at terms other than those posted;
   iii. Close wagering periods at its discretion;
p) If awards are to be paid for combinations involving participants other than solely the first-place finisher (e.g., in an Olympic competition), the order of the participants that can be involved with these awards (e.g., result 8-4-7);

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q) The rules for any exotic wagering types (e.g., same game parlay, teaser, perfecta, trifecta, quinella, etc.) and the expected payouts;
r) How a winning wager is determined and the handling of an award in any case where a tie is possible;
s) The payment of winning wagers, including the redemption period and the method for calculation;
t) Methods for contacting the operation regarding questions or complaints/disputes, including how complaints/disputes may be filed and resolved and how the player may submit complaints/disputes to the regulatory body; and
u) Where transactions may involve rounding:
    i. The method of rounding (e.g., rounding up, rounding down or truncation, or conventional rounding); and
    ii. The increment to which amounts are rounded (e.g., five cents).

A.4.3 Player Protection Information

Player protection information shall be made available to the player. The following player protection information items are commonly included and are not intended to be exhaustive. The regulatory body may require any or all of the following, as well as any additional information it deems necessary:

a) Information about potential risks associated with excessive wagering, and where to get help for a gambling problem;
b) A statement that no underage persons are permitted to participate in event wagering;
c) A list of the available responsible gaming tools that can be invoked by the player (e.g., self-imposed limitations, time-outs, and suspensions) and information on how to invoke those measures;
d) For player accounts, methods which can be used to detect unauthorized use of their account, such as reviewing financial statements against known deposits;
e) Event Wagering Operation contact information and/or other means for asking questions and reporting complaints/disputes; and
f) Regulatory body contact information and/or a link to their website.

NOTE: All links to problem gambling services provided by third parties are to be regularly tested by the operation. Where a link used to supply information on player protection is not displayed or not operational, the operation shall promptly remediate the issue and, in the interim, provide an alternative support service, such as a toll-free helpline number or the regulatory body's resource page.

A.4.4 Terms and Conditions

A set of terms and conditions shall be made available to the player. The following items are commonly included in terms and conditions and are not intended to be exhaustive. The regulatory body may require any or all of the following, as well as any additional information it deems necessary:

a) A statement that only individuals legally permitted by their respective jurisdiction can participate in event wagering;
b) Advice to the player to keep their authentication credentials secure and not permit any unauthorized person to access or use their player account;

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c) Processes for recovering lost authentication credentials, enforcing required credential changes, and applying credential strength and other related security requirements as applicable or required by the regulatory body;
d) The conditions under which a player account is declared inactive and the actions that will be taken once the account is declared inactive;
e) The treatment of the player's pending wagers placed prior to any time-out, suspension, or closure, including whether such wagers will be returned or settled, as appropriate;
f) Information about timeframes and limits regarding deposits to and/or withdrawals from the player account, including, as applicable:
    i. Information regarding all currencies accepted by the system, the conversion rates used with each currency, and where the conversion rates are drawn from;
    ii. A clear and concise explanation of any applicable fees;
g) Notice that player account activity may be monitored and recorded by the Event Wagering Operation and/or regulatory body as necessary and in accordance with applicable data privacy and security laws, regulations, and standards recognized by the regulatory body;
h) Statements that the Event Wagering Operation has the right to, consistent with applicable regulatory requirements:
    i. Refuse to establish a player account for a reason it deems legitimate;
    ii. Refuse deposits to and/or withdrawals from a player account for a reason it deems legitimate; and
    iii. Suspend or close a player account in accordance with the terms and conditions, subject to any restrictions on account suspension or closure during a pending investigation or player complaint/dispute.

A.4.5 Privacy Policies

A set of privacy policies shall be made available to the player. The following items are commonly included in privacy policies and are not intended to be exhaustive. The regulatory body may require any or all of the following, as well as any additional information it deems necessary:

a) The PII required to be collected and processed;
b) The purpose for collecting and processing PII;
c) The period for which the PII is stored or, if no fixed period can be established, the criteria used to determine the retention period;
d) The conditions under which the PII may be disclosed;
e) An affirmation that measures are in place to prevent unauthorized or unnecessary disclosure of the PII; and
f) Any other items required by applicable data protection and privacy laws and regulations for that jurisdiction.

A.4.6 Bonusing/Promotional Offer Terms

Players shall be able to access clear and unambiguous terms pertaining to any available bonusing/promotional offers, which shall include the following as applicable to each offer:

a) The date and time the offer is presented, becomes active, and expires;
b) Player eligibility requirements, including any limitations on participation;

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c) Wagering requirements and limitations, including any restrictions by wager type, wagering event, and/or market;
d) Qualifying criteria for receiving bonusing/promotional credits and/or prizes, including the frequency of issuance, where applicable;
e) Any restriction or terms applicable to restricted bonusing/promotional credits conversions and withdrawals;
f) The order in which bonusing/promotional credits are used for wagers;
g) How the player is notified when bonusing/promotional credits and/or prizes are awarded;
h) Rules governing offer cancellation or expiration; and
i) Any other offer-specific information not otherwise addressed.

A.4.7 Contests/Tournaments

A contest/tournament, which permits a player to either purchase or be awarded the opportunity to engage in competitive wagering against other players or complete defined wagering or activity objectives within a specified period, whether or not in competition with other players, may be permitted provided the following rules are met:

a) Rules shall be made available to a player for review prior to contest/tournament registration or participation. The rules shall include at a minimum:
    i. All conditions participating players shall meet to qualify for entry, advancement through, or completion of the contest/tournament, including any applicable wagering or activity objectives;
    ii. Specific information pertaining to any single contest/tournament, including the available awards and distribution of awards based on specific results, rankings, or completion of objectives;
    iii. The scheduled start and end dates and times, and any conditions that initiate or conclude the contest/tournament, as applicable; and
    iv. The name of the organization (or persons) that conducted the contest/tournament on behalf of, or in conjunction with, the Event Wagering Operation, if applicable.
b) The operation shall have procedures to record the results of each contest/tournament and make them publicly available for registered players to review for a reasonable period of time.
    i. For contests/tournaments involving competition between players, results shall be made publicly available for participating players to review.
    ii. For contests/tournaments not involving competition between players, player-specific results may be made available individually.
c) Subsequently, the results of each contest/tournament shall be made available upon request. The results shall include the following, as applicable:
    i. Name of the contest/tournament;
    ii. Dates and times of the contest/tournament;
    iii. Total number of entries or participating players;
    iv. Amount of entry fees;
    v. Total prize pool or available awards; and
    vi. Amount paid or awards issued for each winning category or completion of defined objectives.

NOTE: For free contests/tournaments (i.e., where a participating player does not pay an entry fee), information relating to entry fees is not required. The total number of entries and total prize pool or available awards shall be reported where applicable.

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A.4.8 Event Wagering in Multiple Languages

Where event wagering is made available to the player in multiple language versions, the Event Wagering Operation shall ensure the following, as required by the regulatory body:

a) Each language version of the same wagering events, markets, and wager types shall offer the same odds/payouts and prices.
b) All wagering instructions and information shall be provided in the language specified for that version and convey the same meaning across all versions, except that common terminology used internationally for event wagering need not be translated.

A.5 Wagering Procedures and Controls

A.5.1 Wagering Events, Odds/Payouts, and Outcome Management

The Event Wagering Operation shall establish and maintain documented procedures governing the lifecycle of wagering events, markets, odds/payouts, and outcomes, ensuring integrity, accuracy, transparency, responsible gaming, and compliance with applicable laws. These procedures shall provide coverage for:

a) Ensuring that each wagering event, market, and wager type offered for wagering is allowed by the regulatory body, and meets the following criteria as required by the regulatory body:
   i. The wagering event or market result can be documented and verified;
   ii. The wagering event or market result can be generated by a reliable and independent process;
   iii. The wagering event or market result is not likely to be affected by any wagers placed; and
   iv. Sufficient integrity monitoring controls and safeguards exist so that the results of the wagering event may be trusted and the risk of match-fixing, cheat-at-play, and other illicit activity that might influence the results is mitigated.
b) Setting and updating the odds/payouts and prices, including:
   i. Publicly providing the current odds/payouts and prices;
   ii. Changing odds/payouts and prices as necessary to handle exceptions; and
   iii. Properly and periodically logging the odds/payouts and prices.
c) Monitoring all changes to odds/payouts and prices, and significant movements or fluctuations throughout a wagering event, to identify and flag errors or discrepancies.
d) Validating the accuracy of wagering data, identifying and flagging errors or discrepancies affecting wagering markets or wager acceptance, and implementing controls to detect and prevent fraudulent or manipulative activities.

A.5.2 Statistics/Line Data

The Event Wagering Operation shall ensure that any statistics/line data made available to a player for a wagering event or market uses a data source allowed by the regulatory body. As required by the regulatory body, the operation shall implement controls to review the data source and corresponding statistics/line data to ensure they are complete, accurate, reliable, timely, and appropriate for the wagering events, markets, and wager types for which they are used.

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A.5.3 Live-Event Wagering

The Event Wagering Operation shall use documented procedures to monitor and ensure the integrity of live-event wagering offerings, results handling, and player protection. These procedures shall address:

a) The timing, receipt, and validation of results information, including appropriate delays and the handling of corrections or changes to such information; and
b) The mitigation of courtsiding or other information asymmetries, including, where appropriate, the use of latency, buffering, or similar mechanisms.

A.5.4 Disabling or Suspending Wagering Events and Markets

The Event Wagering Operation shall establish procedures for manually disabling or suspending wager acceptance on active wagering events or markets, including recording the date, time, and reason for each disabling or suspension.

A.5.5 Managing Risk

The Event Wagering Operation may use mechanisms that offset loss or manage risk in the operation of event wagering, including layoff wagers, liquidity pools, exchanges, or similar mechanisms. The operation placing a layoff wager shall inform the operation accepting the wager that the wager is being placed by an operation and shall disclose their identity.

A.5.6 Wager Voiding and Cancellation Procedures

Wagers cannot be modified except to be voided or cancelled as provided for in the Event Wagering Operation's published wager voiding and cancellation policies. The following requirements apply to wager voids and cancellations:

a) Player initiated voids and cancellations may only be authorized in accordance with the voiding and cancellation policies. An operation may offer players a grace period to request a void or cancellation of their wager, provided that such grace period shall end before a wagering event has begun.
b) Operation initiated voids and cancellations shall provide a reason for the void or cancellation to a player (e.g., past-post wager, pricing error, suspected fraud or integrity concern, etc.) unless disclosure could compromise an investigation or the operation's risk-management or detection methods.
c) The operation shall implement procedures for handling cancelled wagering events or markets and withdrawn wager selections for wagers with multiple wagering events or markets (e.g., parlays).
d) If a wager is voided or cancelled, the wager shall be refunded to the player. If a wagering event or market is cancelled for any reason, all associated wagers shall be refunded in full as soon as reasonably possible.
e) Where required, any void or cancellation of any wager after the results of a wagering event are known shall be reported to the regulatory body.

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A.5.7 Wagering Period Controls and Past-Post Prevention

The Event Wagering Operation shall maintain documentation, procedures, and controls describing how wagering periods are controlled and how past-post wagers are prevented. Such documentation, procedures, and controls shall include, at a minimum:

a) The method used to open, close, or suspend wagering periods, including any period in which wagers are unable to be placed, such as while odds/payouts or prices are being updated;
b) The method used to identify and prevent wager acceptance after the applicable wagering period is closed; and
c) Where these functions are managed or supported by a Third-Party Service Provider, the provider's role and the technical or internal control procedures used by the operation to verify that wagering periods and past-post prevention controls are operating as intended.

A.5.8 Results Verification and Settlement

Prior to settlement, the Event Wagering Operation shall maintain a policy for the confirmation of wagering event and market results. Procedures shall ensure that:

a) Results are verified based on qualified and approved data sources, including where verification or settlement is automated or supported by an external feed;
b) Where an external statistics/line data feed is used, contingency controls are in use when access to the external feed is unavailable, and the operation verifies, either technically or through internal control procedures, that results are received, processed, and settled as intended;
c) Corrections in results, including statistical or official changes, are properly managed, controlled, and auditable; and
d) Monitoring wagering event and market result processing, wager settlement, and the calculation of winnings to identify and flag errors or discrepancies.

A.5.9 Settled or Redeemed Wager Payment

The Event Wagering Operation shall monitor the payment of settled or redeemed winning wagers to identify and flag errors or failures. In the event of a failure of the Event Wagering System's ability to pay settled or redeemed winning wagers, the operation shall have controls detailing the method of paying these wagers when such system failures cannot be resolved in a timely fashion.

A.5.10 Retail Wagering Management

The Event Wagering Operation shall employ the following procedures for managing retail wagering within the Wagering Venue:

a) Procedures to describe the operations and servicing of Retail Wagering Terminals, including the handling of error conditions and performing reconciliations;
b) Procedures to ensure accessibility requirements observed by the regulatory body are met for the installation of Self-Service Wagering Terminals;

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c) Procedures for attendants involved in wager placement, settlement, redemption, voiding, or cancellation at an OTC Wagering Terminal, including:
   i. Accepting wagers from players only during the wager period;
   ii. Notifying players if their wager attempt is rejected;
   iii. Providing notification of any odds/payouts or price changes which occur while attempting to process a wager;
   iv. Providing a player access to a wager record once the wager is authorized;
   v. Requiring the recording of PII or player account registration if their wager placement or redemption exceeds a value specified by the regulatory body; and
   vi. For settled, redeemed, voided, or cancelled wagers, providing payment to players who were not paid automatically by the system (e.g., anonymous wagers).

A.5.11 Sponsored Players

Where sponsored players participate in P2P wagering or spectator wagering, the Event Wagering Operation shall establish processes to ensure that other players are not disadvantaged, including:

a) Mitigating conflicts of interest and unfair advantages arising from a sponsored player's other roles, relationships, or access to the Event Wagering System or nonpublic information that could influence the sponsored player's conduct;
b) Where the sponsored player places private wagers, ensuring that the sponsored player does not have access to software or information that could provide an unfair advantage over other players;
c) Where the sponsored player's wagering is funded by the Event Wagering Operation, ensuring that such funds and any winnings derived from those funds cannot be withdrawn, transferred, or otherwise retained by the sponsored player and are used solely for wagering purposes; and
d) Ensuring that the Event Wagering Operation does not profit from the sponsored player's participation beyond any applicable rake, commission, or fee.

A.6 Player Account Controls

A.6.1 Registration and Verification

If player account registration, verification, and/or activation functionality is performed manually by the Event Wagering Operation, the operation shall have processes and procedures to satisfy the requirements for "Player Account Registration and Verification" as indicated within this document.

A.6.2 Limitation to One Account per Player

The Event Wagering Operation shall implement procedures to reasonably prevent a player from establishing or maintaining more than one player account, whether directly or through the use of another individual as a proxy, unless specifically authorized by the regulatory body. Where multiple accounts are identified, the operation shall investigate and take appropriate action, which may include closing duplicate accounts while allowing the player to retain one account where the operation makes a good-faith determination that the player's conduct was inadvertent and was not intended to obtain a competitive or financial advantage, circumvent account restrictions or controls, or otherwise engage in fraud or prohibited player activity.

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A.6.3 Player Account Management

The Event Wagering Operation shall establish processes and procedures to satisfy the "Player Account Management" requirements of this document, including performing the following player account tasks when requested by the player or as necessary:

a) Accessing and updating the player's registration information, including their PII;
b) Generating and providing the player with transaction logs or account statements;
c) Establishing and updating the player's authentication credentials, including MFA settings or parameters;
d) Adding, modifying, and removing payment methods used for financial transactions;
e) Identifying and managing inactive player accounts; and
f) Closing player accounts and handling any funds remaining in the account.

A.6.4 Player Funds Management and Financial Controls

For financial transactions performed manually by the Event Wagering Operation, the operation shall establish and maintain procedures to satisfy the applicable "Financial Transactions" requirements of this document. Such procedures shall include:

a) Reasonable measures to verify that payment methods or financial accounts are owned by, or their use is authorized for, the player associated with the player account.
b) Technical and procedural safeguards to identify and respond to financial transactions presenting elevated risk indicators under applicable regulatory requirements, including Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) compliance obligations. Responses may include additional review, verification, restrictions, or rejection, as warranted.
c) Processing player requests for withdrawal of unrestricted player funds within a documented period, unless delayed by an unresolved player complaint/dispute or investigation. Any such investigation shall be documented and made available to the regulatory body upon request.

A.6.5 Responsible Gaming Tools

The Event Wagering Operation shall establish processes and procedures to:

a) Implement and manage responsible gaming tools, in accordance with the requirements for "Limitations, Time-Outs, and Suspensions" as indicated within this document;
b) Monitor responsible gaming tools to identify and flag failures of mechanisms used to enforce limitations, time-outs, suspensions, or other responsible gaming measures; and
c) Make commercially reasonable efforts to ensure that advertising or marketing materials are not sent directly to a residential address, email address, phone number, and/or any other contact method associated with a suspended player.

A.6.6 Player Account Monitoring

The Event Wagering Operation's internal control procedures shall include risk-based controls for monitoring player accounts, account access, and associated activity to identify suspicious or potentially fraudulent activity. Such controls shall include, at a minimum:

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a) Identifying indications of false or misleading identity information used to create or attempt to create a player account or place a wager;
b) Monitoring player accounts to identify and flag unauthorized access or compromise, including unauthorized internal access by personnel or external access by unauthorized persons, and implementing safeguards against unauthorized changes to or removal of player accounts;
c) Reviewing player transactions and account activity, including aggregated activity over periods identified in the internal control procedures, to identify activity requiring enhanced due diligence, reporting, or other review, including patterns of potential misuse involving account opening, closure, deposits, withdrawals, or other activity, such as opening and closing accounts within short time frames or conducting financial transactions without associated wagering.

A.6.7 Fraudulent Accounts

The Event Wagering Operation shall maintain a documented policy for the treatment of player accounts determined to have been used for fraudulent activity, including, but not limited to:

a) Maintaining sufficient records of player account activity to support the identification, investigation, and disposition of fraudulent activity;
b) Suspending or otherwise restricting a player account determined to have been used for fraudulent activity, including providing access to an underage person; and
c) Handling deposits, wagers, payouts, and other funds associated with the player account in accordance with the documented policy.

A.6.8 Player Loyalty Programs

As required by the regulatory body, where the Event Wagering Operation offers a player loyalty program or comparable benefit arrangement involving player loyalty points or other comparable entitlements, the operation shall establish and implement controls governing their administration, accounting, redemption, and disclosure. At a minimum, the controls shall ensure that:
a) The manner in which player loyalty points or comparable entitlements are earned, accumulated, adjusted, expired, forfeited, redeemed, or otherwise used is clearly documented and made available to the player;
b) Awards, benefits, or redemption opportunities are equally available to all players who achieve the applicable minimum level of qualification for such player loyalty points or comparable entitlements;
c) Redemption of player loyalty points or comparable entitlements is performed as a secure transaction that automatically debits the balance for the value redeemed;
d) All transactions involving player loyalty points or comparable entitlements are recorded, including points earned, redeemed, adjusted, expired, forfeited, or reversed; and
e) Player loyalty point or comparable entitlement balances and related transaction history are made available to the player upon request.

A.7 Device and Application Controls

A.7.1 Device Security and Application Integrity Monitoring

The Event Wagering Operation shall establish and implement procedures to assess available Remote Player Device security and Player Application integrity information for potential risks associated

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with player access, including indications that operating system security checks or attestation services are unavailable, bypassed, unreliable, or compromised, where applicable.

A.7.2 Suspicious Device Usage Patterns

The Event Wagering Operation shall establish and implement procedures to monitor and identify suspicious Remote Player Device usage patterns, including an unusually high number of player accounts accessed from the same Remote Player Device, a single player account accessed from an unusually high number of Remote Player Devices, or activity involving devices associated with suspicious behavior. The following shall apply:

a) Monitoring shall be based on documented risk-based detection criteria, which may include thresholds, monitoring periods, and other relevant risk indicators, and shall incorporate any specific criteria required by the regulatory body; and
b) Activity meeting the applicable detection criteria shall be flagged for investigation.

A.7.3 Device and Application Security Incident Response

The Event Wagering Operation shall establish and implement procedures for responding to potential compromises, tampering, unauthorized interference, or suspicious device usage identified in accordance with the "Device and Application Integrity" requirements. Such responses may include, where applicable, logging out the player, restricting application functionality, preventing wagering or financial transactions, and investigating associated alerts or flagged activity.

A.8 Integrity, Fraud, and AML/ATF Controls

A.8.1 Recordkeeping

The Event Wagering Operation shall maintain complete, accurate, and auditable records to demonstrate compliance with this section, including monitoring activities, alerts, reports, investigations, decisions made, actions taken and their reasons, regulatory notifications, AML/ATF documentation, and other supporting evidence.

A.8.2 Integrity and Compliance Program

The Event Wagering Operation shall establish and maintain an integrity and compliance program that includes:

a) Documented policies, procedures, controls, and monitoring mechanisms to protect the integrity of event wagering and ensure compliance with applicable regulatory requirements, including Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) compliance obligations;
b) Continuous monitoring of the Event Wagering System to identify and flag potential security threats, system integrity issues, service disruptions, improper system operation, or unauthorized access to or exposure of sensitive information; and
c) Review and update of these policies, procedures, controls, and monitoring mechanisms at documented intervals consistent with applicable regulatory requirements, and whenever necessary to address operational experience, identified risks, or changes in regulatory requirements or the operating environment.

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A.8.3 Suspicious Player Activity Review and Response

The Event Wagering Operation shall establish risk-based procedures to identify, document, review, investigate, escalate, and respond to suspicious player activity, including coordinated player activity, prohibited player activity, misuse of automated tools, and other threats to integrity in event wagering. These procedures shall include, at a minimum:

a) Reviewing and investigating alerts, reports, complaints/disputes, or other indications of activity, patterns, or conduct that may compromise the integrity of a wager, wagering event, or event wagering in general;
b) Taking appropriate action against suspicious player activity, including financial transactions, wagers, or player access, which may include refusing, delaying, suspending, voiding, cancelling, or limiting wagers or transactions, and restricting, suspending, or closing player accounts, where permitted by the regulatory body, internal control procedures, or wagering rules; and
c) Reporting suspected or confirmed integrity concerns to appropriate personnel and, where required, to the regulatory body or other relevant authorities.

A.8.4 Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF)

The Event Wagering Operation shall establish and maintain policies and procedures to identify and address potential money laundering and terrorist financing risks associated with event wagering. These policies and procedures shall include, at a minimum:

a) Providing ongoing training of relevant personnel on identifying, handling, escalating, and reporting unusual or suspicious transactions and activities;
b) Designating one or more individuals responsible for AML/ATF compliance, including reporting unusual or suspicious transactions and activities to appropriate authorities; and
c) Using automated systems, monitoring tools, or other data analysis methods to help detect, investigate, and report potential money laundering or terrorist financing activity, including attempts to divide transactions into smaller amounts to avoid regulatory reporting requirements (e.g., structuring).

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Appendix B: Integrity and Security Assessments

B.1 Introduction

B.1.1 General Statement

Where required by the regulatory body, Integrity and security assessments shall be conducted against the applicable controls and tests identified in the *GLI Gaming Security Framework (GLI-GSF)*, together with any additional controls or tests identified by the regulatory body.

a) The appropriate audit procedures and assessment methods shall be selected on a case-by-case basis, considering the scope, architecture, configuration, deployment model, data flows, Third-Party Service Provider relationships, and risk profile of the Event Wagering System's Gaming Production Environment (GPE).
b) Assessments shall be conducted at the frequency specified in the GLI-GSF, unless otherwise specified by the regulatory body.

NOTE: Regulatory bodies are encouraged to allow flexibility in assessment schedules for multi-jurisdictional Event Wagering Operations to allow the consolidation of assessments across multiple jurisdictions on a common schedule, provided applicable regulatory requirements are met. Please refer to the *GLI Gaming Security Framework (GLI-GSF)* for additional information.

B.2 Assessment Requirements

B.2.1 Assessment Scope and Composition

Unless otherwise specified by the regulatory body, Integrity and Security Assessments shall include a Gaming Information Security (GIS) Controls Audit and a Gaming Technical Security (GTS) Assessment applicable to the critical components of the Event Wagering System's GPE, which include but are not limited to:

a) Components that record, store, process, share, transmit, or retrieve sensitive information, including personally identifiable information (PII), authentication credentials, financial transactions, encryption keys, validation numbers, or outcomes;
b) Components that receive or process statistics/line data, results, or other information used to determine odds/payouts, outcomes, or settlement of wagering events and markets;
c) Components that record the current state, status, or history of a player's wagering activity;
d) Points of entry to and exit from the above critical components, including systems, applications, interfaces, and Third-Party Service Provider connections that provide access to or communicate directly with those critical components; and
e) Communication networks that support access to, communication between, or transmission of sensitive information to or from critical components.

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B.2.2 Gaming Information Security (GIS) Controls Audit

The GIS Controls Audit shall evaluate the effectiveness of the administrative, technical, physical, environmental, incident response, risk management, and gaming security controls applicable to the critical components identified within the assessment scope. The GIS Controls Audit shall include applicable GIS controls from the following GLI-GSF modules and any additional controls required by the regulatory body or determined necessary based on the risk, architecture, configuration, or operation of the Event Wagering System's GPE:

a) GLI-GSF-1 Gaming Information Security (GIS) Controls Audit – Common Controls;
b) GLI-GSF-4 Gaming Information Security (GIS) Controls Audit – Landbased Gaming Controls (for retail wagering);
c) GLI-GSF-5 Gaming Information Security (GIS) Controls Audit – Online Gaming Controls (for remote wagering); and
d) Any other GLI-GSF modules which may be applicable to the system's GPE.

B.2.3 Gaming Technical Security (GTS) Assessment

The GTS Assessment shall evaluate the security posture of the systems, applications, interfaces, networks, infrastructure, service provider connections, and critical components applicable to the assessment scope. Testing shall be sufficient to identify vulnerabilities, misconfigurations, exploitable conditions, weaknesses in security controls, and other technical risks that may affect the Event Wagering System's GPE. Unless otherwise specified by the regulatory body, the assessment shall include the following activities, as applicable, in accordance with the *GLI-GSF-2 Gaming Technical Security (GTS) Assessment* module, as applicable:

a) Vulnerability Assessments of digital platforms, websites, applications, and internal, external, and wireless networks, to identify vulnerabilities or other security weaknesses affecting devices, servers, and other components that record, store, process, share, transmit, or retrieve sensitive information or are connected to such networks;
b) Penetration Tests of the same components to determine whether vulnerabilities or other security weaknesses identified during the Vulnerability Assessment can be exploited to compromise the system's GPE;
c) Cloud Security Assessments to evaluate the implementation and management of cloud-specific security controls and configurations;
d) Firewall Security Assessments to evaluate the operation and effectiveness of perimeter and internal firewalls, including their security configurations and rule sets;
e) Risk Assessments to evaluate the likelihood and potential impact of identified vulnerabilities, non-conformities, threats, or other security weaknesses;
f) Validation of assessment findings to confirm identified issues and exclude false positives; and
g) Additional testing or assessments required by the regulatory body or determined necessary based on the risk, architecture, configuration, and operation of the system's GPE.

NOTE: The *GLI-GSF-2 Gaming Technical Security (GTS) Assessment* module establishes common terminology and potential technical security testing methods for the Event Wagering System's GPE. It is not intended to be used in a prescriptive manner, but as a guide based on risk appetite and threat sources as determined by the regulatory body.

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B.3 Recurring Vulnerability Scans

B.3.1 Vulnerability Scans

In addition to the integrity and security assessments required under this appendix, where required by the regulatory body, Vulnerability Scans shall be performed on the internal and external networks of the Event Wagering System's GPE in accordance with the *GLI-GSF-2 Gaming Technical Security (GTS) Assessment* module. Scans shall be conducted at the frequency specified in the GLI-GSF, unless otherwise specified by the regulatory body.

NOTE: Regulatory bodies are encouraged to allow flexibility in scanning schedules for multi-jurisdictional Event Wagering Operations to allow the consolidation of scans across multiple jurisdictions on a common schedule, provided applicable regulatory requirements are met. Please refer to the *GLI Gaming Security Framework (GLI-GSF)* for additional information.

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Appendix C: Third-Party Service Providers and Solutions

C.1 Introduction

C.1.1 General Statement

This appendix sets forth requirements and procedures applicable to the following Third-Party Service Providers whose solutions are incorporated into or used in conjunction with the Event Wagering System:

a) KYC Service Providers and Solutions; and
b) Geolocation Service Providers and Solutions.

NOTE: The regulatory body or Event Wagering Operation may choose to require any such service provider and their associated solutions to undergo independent third-party assessments and evaluations against the applicable requirements and procedures of this appendix, applicable recognized industry standards, and any additional requirements specified by the regulatory body, as appropriate to the services and solutions provided.

C.2 KYC Service Providers and Solutions

C.2.1 KYC Service Assessments and Evaluations

The KYC Service Provider shall support and comply with all regulatory body or Event Wagering Operation requests for independent third-party assessments of the KYC Service Provider and evaluations of their KYC Solution's ongoing ability to accurately and reliably verify player identities, assess player eligibility, and detect and mitigate existing and emerging identity fraud and impersonation risks.

NOTE: Regulatory bodies are encouraged to allow flexibility in assessment and evaluation schedules for multi-jurisdictional Event Wagering Operations to allow the consolidation of assessments and evaluations across multiple jurisdictions on a common schedule, provided applicable regulatory requirements are met.

C.2.2 KYC Data Source Management

The KYC Solution shall use reliable identity data sources, which may include, where applicable, governmental databases or other authoritative or credible data sources and process the applicable verification results. Multiple independent sources may be used where appropriate based on the reliability of the available information and associated risks and shall be used where required by the regulatory body.

C.2.3 Identity Information Matching Criteria

The KYC Solution shall verify player registration information received from the Event Wagering System using the following matching criteria:

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a) The following registration information shall match exactly, allowing for standard formatting differences and the exceptions specified below:
   i. Last name, allowing for standard differences involving suffixes, punctuation, spacing, or hyphenation. Partial matches involving compound surnames may be accepted where supported by other verified identity information;
   ii. Date of birth; and
   iii. Full or partial government identification number, as available for verification.
b) The following registration information shall match, allowing reasonable variations:
   i. First name, including common nicknames, recognized name variations, or minor spelling errors; and
   ii. Physical residential address, including common abbreviations, formatting differences, or minor spelling errors. Missing or conflicting apartment or unit numbers for multi-unit addresses shall require additional review or verification commensurate with the associated risk, including enhanced identity verification where necessary or required by the regulatory body.

C.2.4 Additional Identity Verification

The KYC Solution shall require additional review or verification, including enhanced identity verification where necessary based on the associated risk or required by the regulatory body, when the player's identity cannot be successfully verified, the results are inconclusive, or the information does not meet the required matching criteria.

C.2.5 Enhanced Identity Verification

Where enhanced identity verification is necessary or required by the regulatory body, the KYC Solution shall employ one or more of the following mechanisms, as applicable:

a) Use information about the Remote Player Device and contact information provided during registration to help confirm the player's identity and identify potential fraud risks. The KYC Solution shall:
   i. Check whether the device and contact information are consistent with the player's claimed identity, where reliable information is available. This may include checking whether the device used to register the account and the contact information provided are associated with the person whose identity is being verified;
   ii. Reasonably detect any known history of fraudulent activity associated with the device or contact information; and
   iii. Where signs of previous fraudulent activity are detected, determine whether the device and contact information provide sufficient support for the claimed identity or whether additional verification methods or manual review are necessary;
b) Require the player to provide a government-issued identification credential that can reasonably be determined to belong to them. The KYC Solution shall:
   i. Verify that the identification credential is genuine, currently valid, and has not been altered, forged, or fraudulently reused;
   ii. Where biometric or similar identity comparison technology is used, employ liveness detection or equivalent safeguards to reasonably confirm that the person presenting the identification is its rightful holder; and

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iii. Detect and prevent repeated use of the same identification credential in a manner that suggests fraud, misuse, or improper creation of multiple accounts;

c) Require the player to enter a valid One-Time Authentication Credential (OTAC) sent to previously verified contact information associated with the player's claimed identity; or
d) Use another identity verification mechanism evaluated by the independent test laboratory and approved by the regulatory body in accordance with recognized industry standards.

NOTE: Additional supporting information may be necessary to establish sufficient confidence in the player's identity and, where applicable, confirm that the supporting evidence is genuine and valid.

C.2.6 Underage or Deceased Individual Attempts

The KYC Solution shall employ reasonable mechanisms designed to detect and prevent any attempt to create an account by an individual who is identified using the personally identifiable information (PII) of an underage or deceased individual.

C.2.7 Verification Results and Communication

The KYC Solution shall support the secure and reliable communication of identity verification and eligibility results to the Event Wagering System, including mechanisms to:

a) Associate results with the correct player account or request;
b) Prevent unauthorized modification, substitution, or reuse of results; and
c) Communicate subsequent changes that materially affect previously issued results, where applicable.

C.2.8 Identity Verification Records

The KYC Service Provider shall securely maintain or provide access to records of identity verification activities, including verification results, exceptions, supporting evidence or references to that evidence, and any decisions made through manual review. Sensitive information relating to KYC shall be protected and retained only as permitted or required by applicable data privacy and security laws, regulations, and standards observed by the regulatory body.

C.3 Geolocation Service Providers and Solutions

C.3.1 Geolocation Service Assessments and Evaluations

The Geolocation Service Provider shall support and comply with all regulatory body or Event Wagering Operation requests for assessments of the Geolocation Service Provider and evaluations of the Geolocation Solution, including assessments of applicable operational procedures and controls specified in this section and evaluations of the solution’s ongoing ability to effectively detect and mitigate existing and emerging location fraud risks, together with any additional requirements specified by the regulatory body.

NOTE: Regulatory bodies are encouraged to allow flexibility in assessment and evaluation schedules for multi-jurisdictional Event Wagering Operations to allow the consolidation of assessments and evaluations across multiple jurisdictions on a common schedule, provided applicable regulatory requirements are met.

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C.3.2 Geolocation Verification Capabilities

The Geolocation Solution shall support the determination and verification of a Remote Player Device's real-world geographic location using reliable and authenticated location data, including a pseudonymized player identifier that does not directly reveal the player's identity, and any other information necessary to perform the geolocation check. The Geolocation Solution shall:

a) Conduct geolocation checks for triggering actions, intervals, and other conditions specified by the regulatory body in accordance with the requirements for "Geolocation Triggering Actions";
b) Support the receipt, processing, and analysis of location data from Remote Player Devices and other authorized sources;
c) Use multiple independent location data sources or supporting signals in accordance with the requirements for "Geolocation Data Sources and Cross-Validation";
d) Not use IP address analysis as the primary location data source for geolocation checks unless otherwise authorized by the regulatory body;
e) Generate and communicate results to the Event Wagering System indicating whether the geolocation check is successful or unsuccessful, in accordance with the requirements for "Geolocation Checks, Logging, and Failures"; and
f) Support the Event Wagering System's enforcement of geolocation requirements, including preventing actions requiring successful location verification when the geolocation check is unsuccessful.

C.3.3 Device and Application Integrity

The Geolocation Solution shall employ multiple detection mechanisms appropriate to its design and implementation, including at least one that does not rely on built-in operating system security or attestation services, to reasonably detect potential compromise, tampering, or unauthorized interference involving Remote Player Devices, Player Applications, or associated security-related data. These mechanisms shall, where applicable:

a) Monitor the Player Application for unauthorized runtime interference, which may include, where applicable, inserting or intercepting code (e.g., code injection or hooking), overlay attacks, altering application memory, bypassing or manipulating security functions, unauthorized changes to Application Programming Interface (API) calls, or similar activity;
b) Detect signs of Remote Player Device or Player Application compromise, which may include, where applicable, attempts to bypass device security protections (e.g., rooting or jailbreaking), use of simulated or virtual devices (e.g., emulation or virtualization), unauthorized modifications to operating system functions, or similar conditions;
c) Detect attempts to circumvent device identification or monitoring, including suspicious changes to device identifiers or characteristics (e.g., graphics hardware (GPU) characteristics, screen resolution, operating system information, hardware identifiers, or similar device attributes); and
d) Support appropriate responses to detected compromise or interference, including rejecting geolocation requests, restricting affected functionality, and generating alerts for investigation.

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C.3.4 Location Fraud and Evasion Prevention

The Geolocation Solution shall employ mechanisms to reasonably detect attempts to misrepresent a Remote Player Device's real-world geographic location or circumvent geolocation controls, including, where applicable:

a) Network-Based Location Concealment: Use of TOR (The Onion Router) exit nodes, data center or residential proxies, anonymizers, unauthorized Virtual Private Networks (VPNs), or similar network-routing services to conceal or misrepresent a player's geographic location;
b) Location Spoofing or Manipulation: Use of fake location applications, spoofing tools, manipulated location services, Wi-Fi injection or signal manipulation, simulated or virtual devices (e.g., emulation or virtualization), or similar technologies to falsify location data;
c) Remote Access or Location Relaying: Use of remote desktop software, remote control, screen-sharing, location relaying, or similar technologies to circumvent geolocation controls; and
d) Suspicious Location Characteristics: Implausible travel, conflicting location signals, or other inconsistencies indicative of potential location fraud.

NOTE: IP Address analysis may be used as a supplementary means of detecting potential geolocation fraud or evasion, including attempts to conceal or misrepresent a player's real-world geographic location.

C.3.5 Location Data and Communication Security

The Geolocation Solution shall implement appropriate security mechanisms to protect the authenticity, integrity, and confidentiality of location data, geolocation requests, check results, and associated components against unauthorized access, manipulation, or misuse. These mechanisms shall, where applicable:

a) Protect communications, including exchanges through system-side APIs, against interception, alteration, substitution, or reuse, including replay attacks and man-in-the-middle attacks, through cryptographically authenticated and integrity-protected communications or equivalent safeguards, and prevent outdated, altered, duplicated, or otherwise invalid geolocation results from being accepted as valid;
b) Where a software development kit (SDK) or similar component is used, verify its authenticity and the origin of location data, and detect indications of tampering, impersonation, or unauthorized execution through cryptographic signing, attestation, server-side validation, or equivalent safeguards;
c) Detect potential misuse involving unauthorized or headless clients, harvested or misused cryptographic keys, and unauthorized simulation or emulation of SDKs or other location verification components;
d) Limit exposure of sensitive validation logic, cryptographic keys, diagnostic feedback, rejection codes, technical failure details, or other information that could facilitate circumventing or manipulating geolocation checks; and
e) Ensure that geolocation results are associated with the correct Remote Player Device, player account or request reference, and applicable verification context.

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C.3.6 Geolocation Accuracy and Boundaries

The Geolocation Service Provider shall establish and implement documented policies and procedures to ensure the Geolocation Solution assesses the accuracy, reliability, and consistency of available location data, identifies conflicting, insufficient, or unreliable information, and appropriately manages geolocation accuracy and geofence boundary risks, including:

a) Identifying and correcting inaccuracies or discrepancies in mapping sources and geographic boundary data, including the use of accurate geographic boundary polygons where appropriate;
b) Determining an appropriate accuracy radius for each geolocation check, considering available location data and relevant risks, including connection type, device movement, proximity to the geofence boundary, and estimated travel speed; and
c) Establishing acceptable accuracy-radius limits and criteria for determining whether the device's estimated location, including its accuracy radius, falls entirely within the permitted geofence, including the handling of overlap with or extension beyond any established boundary buffer zone.

C.3.7 Geolocation Reporting and Analytics

The Geolocation Service Provider shall retain historical location data for a documented period consistent with applicable regulatory requirements and provide reporting, analysis, and fraud-monitoring capabilities that:

a) Provide a real-time dashboard and data feed of all geolocation checks, accessible as required by the Event Wagering Operation or regulatory body, with the ability to customize, display, and filter the following information, at a minimum, as applicable:
    i. Pseudonymized player identifier;
    ii. The date and time of the geolocation check;
    iii. Relevant player access information (e.g., device identifier and type, application identifier and version, and connection type), where available;
    iv. Relevant device location data; and
    v. Geolocation result, including the reason for any unsuccessful geolocation check.
b) Analyze individual geolocation checks and player location activity over time to detect suspicious patterns, including unrealistic travel distances or speeds, unusual changes in location, inconsistencies with previous account, device, or network activity, repeated unsuccessful checks, or signs of coordinated, remotely relayed, or automated access;
c) Generate alerts or flag suspected unauthorized, improper, or fraudulent activity for investigation, including activity involving players or devices that were previously blocked or flagged;
d) Where supported, provide an interactive mapping and reporting tool to display geolocation check locations, including geographic coordinates, and highlight high-risk transactional activity, such as location spoofing, account or device sharing, and sudden or inconsistent changes in location (location jumping);
e) Support the reporting and investigation of suspected location fraud, including sharing relevant information with authorized Event Wagering Operations and regulatory bodies; and
f) Comply with applicable data privacy and security laws, regulations, and standards required or recognized by the regulatory body.

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C.3.8 Geolocation Solution Maintenance

The Geolocation Service Provider shall maintain the security, accuracy, and reliability of the Geolocation Solution through the following activities at documented intervals, consistent with applicable regulatory requirements:

a) Updating and testing proprietary databases used to identify IP addresses, proxies, VPNs, fraudulent activity, and other location-related risks; and
b) Maintaining and updating the Geolocation Solution, including software patches and configuration changes, to ensure accurate location data collection, compatibility with Remote Player Devices, and the detection and prevention of evolving location fraud techniques.

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Glossary of Key Terms

Access Control – The process of granting or denying specific requests for obtaining and using sensitive information and related services specific to a system; and to enter specific physical facilities which house critical network or system infrastructure.

Algorithm – A finite set of unambiguous instructions performed in a prescribed sequence to achieve a goal, especially a mathematical rule or procedure used to compute a desired result. Algorithms are the basis for most computer programming.

Attendant Interface – An interface application or program through which the attendant views and/or interacts with the OTC Wagering Terminal.

Audit Trail – A record showing who has accessed a system and what operations the user has performed during a given period.

Authentication – Verifying the identity of a user, process, software package, or device, often as a prerequisite to allowing access to resources in a system.

Back – To wager on a wager selection occurring (wagering that a result will occur) in a given market.

Backup – A copy of files and programs made to facilitate recovery if necessary.

Barcode – An optical machine-readable representation of data, including interleaved 2 of 5 barcodes, quick response (QR) codes, or any machine-readable codes found on printed wager records.

Barcode Reader – A device that is capable of reading or interpreting a barcode. This may extend to some smartphones or other electronic devices that can execute an application to read a barcode.

Beacons – Short-range communications technology used to assist in determining whether a Remote Player Device is within a permitted geofence. Examples include Bluetooth Beacons, Near Field Communication, Ultra-Wideband, Ultrasonic Signals, or comparable technologies.

Biometrics – A biological identification input, such as fingerprints or retina patterns.

BT, *Bluetooth* – A low power, short-range wireless communications protocol utilized for the interconnection of cellular phones, computers, and other electronic devices. Bluetooth connections typically operate over distances of ten meters or less and rely upon short-wavelength radio waves to transmit data over the air.

Bonusing/Promotional Offers (aka "Bonusing/Promotional Credits and/or Prizes" or "Bonusing/Promotional Amounts") – Credits and/or prizes not included in the standard odds/payouts or settlement applicable to a wagering event or market, that are awarded based upon pre-determined events or criteria established by the terms of the offers. Such offers may be triggered by player activity tied to a specific player account or wager, by external conditions not directly tied to player activity, at random, as a bundle with the purchase of related products, services, or activities, or upon the completion of specified tasks disclosed to the player. Examples include, but are not

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limited to, earning bonusing/promotional credits based on a first deposit or wager, awarding prizes after wagering a specific amount on a wagering event or market, awarding credits for wagering more than a specific amount within a specified time period, applying a specified multiplier to eligible winnings; and awarding bonusing/promotional credits after making a non-wager purchase.

Cancelled Wager – A wager that was valid at the time that it was made but has since been invalidated in a manner acceptable by the regulatory body due to an event or action that prevents its completion.

Client-Side Tampering – The manipulation of location data, application logic, or related client-side components before or during a geolocation request.

Collusion – Coordinated player activity used to gain an unfair advantage in event wagering.

Communications Technology – Any method used, and the components employed, to facilitate the transmission and receipt of information, including transmission and reception by systems using wire, wireless, cable, radio, microwave, light, fiber optics, satellite, or computer data networks, including the Internet and intranets.

Contest/Tournament – An organized, measured event that permits a player to engage in competitive wagering against other players or complete defined gameplay or activity objectives within a specified period to earn an award, whether or not in competition with other players. An out-of-revenue contest/tournament involves only non-wagered participation using contest/tournament credits or points that have no cash value. In contrast, an in-revenue contest/tournament allows for wagering in conjunction with participation in the contest/tournament.

Coordinated Player Activity – Suspicious player activity involving two or more individuals, accounts, devices, payment methods, chat or external communication channels, or related identifiers that may indicate collusion, multi-accounting, syndicate behavior, shared account control, information sharing, signaling, unauthorized proxy betting, complementary or offsetting wagers across related markets, or other conduct designed to obtain an unfair advantage, evade controls, or compromise the integrity of event wagering.

Coupon – A wagering instrument that is used primarily for promotional purposes and which can be redeemed for restricted or unrestricted credits.

Critical Component – Any sub-system for which failure or compromise can lead to loss of player entitlements, government revenue or unauthorized access to data used for generating reports for the regulatory body.

Critical Control Program – A software program that controls behaviors relative to any applicable technical standard and/or regulatory requirement.

Cryptographically Strong RNG – A RNG that is resistant to prediction or compromise by an intelligent attacker with modern computational resources, and who may have knowledge of the design or source code of the RNG and/or its algorithm. Cryptographically strong RNGs cannot be feasibly 'broken' to predict future values.

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Debit Instrument – A card, code, or other device with which a person may initiate an electronic funds transfer. The term includes, without limitation, a prepaid access instrument.

Discretionary Account Funds – Restricted bonusing/promotional credits and bonusing/promotional credits that have a possible expiration.

Dividend – The payout amount per unit wager payable to a winning pari-mutuel wager.

Domain – A group of computers and devices on a network that are administered as a unit with common rules and procedures.

EFT, *Electronic Funds Transfer* (aka "ECT", "Electronic Credits Transfer") – A financial transaction involving an electronic transfer of funds between an electronic payment account and a player account using a Payment Processor. This includes Automated Clearing House (ACH) transfers.

Electronic Payment Account – An account maintained with a financial institution or third-party Payment Processor, such as PayPal, Google Pay, or Apple Pay, for the purposes of making electronic funds transfers. The term does not include a player account, or any other account held by an Event Wagering Operation and used for wagering purposes.

Encryption – The conversion of data into a form, called a ciphertext, which cannot be easily understood by unauthorized people.

Encryption Key – A cryptographic key that has been encrypted in order to disguise the value of the underlying plaintext.

Entry Fee – The value a player commits to participate in a contest/tournament.

Event Wagering – The offering, placement, and acceptance of wagers on one or more wager selections within markets associated with a wagering event, including the determination and settlement of such wagers in accordance with the established conditions, rules, and odds/payouts.

Event Wagering Operation – The collective arrangement through which event wagering is conducted, managed, and controlled, encompassing the operator and any suppliers, service providers, or other parties involved in event wagering, together with the technological capabilities of the Event Wagering System and the associated internal control procedures and policies used to govern wagering activities.

Event Wagering System – The hardware, software, firmware, communications technology, other equipment, as well as operational procedures implemented in order to allow player participation in event wagering, and, if supported, the corresponding equipment related to the display of wager outcomes, and other similar information necessary to facilitate player participation. The system provides the player with the means to place and manage wagers. The system provides the Event Wagering Operation with the means to review player accounts, if supported, disable wagering events, generate various wagering, financial transaction, and player account reports, input results for wagering events, and set any configurable parameters. The term does not include Remote Player Devices or communications technology used by a player to participate in remote wagering.

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Exchange Wagering – A form of P2P wagering in which two or more players place identically opposing wagers on the same wagering event or market, allowing players to back or lay the same wager selection.

Exchange Wagering Liquidity – The amount of unmatched exchange wagering volume available at specific odds/payouts in a market, indicating how easily a player's wager can be matched.

Firewall – A component of a computer system or network that is designed to block unauthorized access or traffic while still permitting outward communication.

Fixed Odds Wagering – A wager category where the payout is to be fixed at the time the wager is placed. If the predictions are correct, the odds are first multiplied by each other and then by the amount of the wager.

Free Bet/Demo Mode – A wager mode that allows a player to simulate wagering without placing any paid wager, principally for the purpose of learning or understanding wagering mechanics.

Geolocation Service Provider – An in-house or third-party entity who designs, maintains, updates, and provides their Geolocation Solution.

Geolocation Solution – Software, source code, or executable code used to reasonably identify the real-world geographic location of a player when using their Remote Player Device, including reasonably detecting and flagging any attempts to conceal, relay, proxy, spoof, falsify, or otherwise misrepresent their location.

GPE, *Gaming Production Environment* – The operational setting where event wagering activities and related services are conducted, managed, and delivered to players in a live or real-time manner.

Group Membership – A method of organizing user accounts into a single unit (by job position) whereby access to system functions may be modified at the unit level and the changes take effect for all user accounts assigned to the unit.

Hash Algorithm – A function that converts a data string into an alpha-numeric string output of fixed length.

Inactive Player Account – A player account considered to be inactive under the conditions as specified in the terms and conditions.

Identically Opposing Wagers – Wagers in which one or more players offer to lay a wager selection at the same odds/payout at which one or more players offer to back that selection, with the amount subject to the lay being proportionately commensurate with the amount subject to the back.

Incrementing Bonus Jackpot – A monetary award or "jackpot payoff" that increases on the occurrence of one or more specific conditions established by the wagering rules. In addition to those specific conditions, it is acceptable for incrementing bonus jackpots to also increase according to the amounts wagered.

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Information Security – Protecting information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide integrity, confidentiality, and availability.

Internet – An interconnected system of networks that connects computers around the world via TCP/IP.

IP Address, *Internet Protocol Address* – A unique number for a computer that is used to determine where messages transmitted on the Internet should be delivered. The IP address is analogous to a house number for ordinary postal mail.

Jailbreaking – Modifying a smartphone or other electronic device to remove restrictions imposed to allow the unauthorized installation of software or other unauthorized device operations.

Key – A value used to control cryptographic operations, such as decryption, encryption, signature generation or signature verification.

KYC Service Provider, *Know-Your-Customer Service Provider* (aka "Identity Verification Service Provider") – An in-house or third-party entity who verifies, or provides information for the verification and validation of the identity of individuals.

KYC Solution, *Know-Your-Customer Solution* (aka "Identity Verification Solution") – A mechanism to reasonably verify and validate the identity of individuals.

Lay – To wager on a wager selection not occurring (wagering the results will not occur) in a given market.

Layoff Wager – A wager placed by an operator with another operator to offset liability.

Line Posting – A value that establishes a wager's potential payout (e.g., moneyline + 175) or the conditions for a wager to be considered a win or loss (e.g., point spread + 2.5).

Link Utilization – The percentage time that a communications link is engaged in transmitting data.

Linked Wagering – A form of spectator wagering in which a spectator player's wager is linked directly to each wager of a host player, such that identical outcomes (wins and losses) are applied proportionally to the spectator player's account.

Live-Event Wagering (aka "In-Play Wagering" or "In-Game Wagering") – A wager category in which wagers are accepted on a wagering event while the event is in-progress or taking place.

Malware – A program that is inserted into a system, usually covertly, with the intent of compromising the confidentiality, integrity, or availability of the victim's data, applications, or operating system or of otherwise annoying or disrupting the victim.

Man-in-the-Middle Attack – The interception, modification, injection, substitution, or manipulation of location data or geolocation results during communication between the Remote Player Device, Event Wagering System, and/or Geolocation Solution.

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Market – A proposition within a wagering event that specifies the results upon which one or more wager selections may be offered, including the applicable conditions, settlement criteria, and odds/payouts (e.g., match winner, total points, player performance).

Market Maker – An entity who provides exchange liquidity and/or odds/payouts to an Event Wagering Operation that is offering exchange wagering.

Matched Wager – A wager that is formed when two or more players are confirmed as having placed identically opposing wagers in a given market.

MFA, *Multi-Factor Authentication* – A type of authentication which has been demonstrated to effectively provide higher security than a username and password alone to verify an individual's identity. Supporting technologies may include Customer Identity and Access Management (CIAM) platforms, Fast Identity Online (FIDO) authentication solutions, or similar authentication frameworks.

Moneyline – A wager type in which the player wagers on which participant will win a wagering event, without the application of a point spread or handicap.

NFC, *Near Field Communication* – A short-range wireless connectivity standard that uses magnetic field induction to enable communication between devices when they are touched together or brought within a few centimeters of each other.

Non-Wager Purchase – A purchase made by the player of an item or entitlement which does not influence the outcome, odds/payouts, or prices of any wager (cosmetic items, display customization options, etc.). A non-wager purchase is not a wager.

Operator – An entity that conducts or oversees event wagering through the technological capabilities of the Event Wagering System and associated internal control procedures, whether directly or through suppliers, service providers, or other parties acting on its behalf, and remains accountable for its responsibilities under applicable regulatory requirements.

OTAC, *One-Time Authentication Credential* (aka "One-Time Passcode (OTP)") **–** A secure, temporary, authentication credential either sent to a Remote Player Device, or an email address, or phone number that has been confirmed as being owned or possessed by the player or generated by an authentication application or software program used by the player and accepted by the Event Wagering System.

OTC Wagering Terminal, *Over-the-Counter Wagering Terminal* – An attendant station that at a minimum will be used by an attendant for the execution or formalization of wagers placed on behalf of a player and, if supported, may be used for redemption of wager records and other authorized activities.

Over/Under (aka "Total Wager") – A wager type in which the player wagers on whether the combined total of a specified statistic or scoring measure, such as total points, goals, runs, or rounds, will be greater than or less than the total posted by the Event Wagering Operation.

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P2P Wagering, *Peer-to-Peer Wagering* – A wager category where players wager with and against one another rather than against the Event Wagering Operation, who may take a rake, commission, or fee for facilitating the wagering activity. Examples of P2P wagering include, but are not limited to, exchange wagering, head-to-head wagering, contests, tournaments, pools, etc.

Pari-Mutuel Wagering – A wager category where individual wagers are gathered into a pool. The winnings are calculated by sharing the pool among all winning wagers.

Parlay – A single wager that links together two or more individual wagers and is dependent on all of those wagers winning together.

Participant – The athlete, team, or other entity that competes in a wagering event.

Passkey – An authentication credential based on public-key cryptography that uses a pair of cryptographic keys and typically authenticates an individual through verification of biometrics, a PIN, or other device-based authentication. A passkey may satisfy multi-factor authentication requirements where its implementation provides authentication using two or more independent authentication factors.

Password – An authentication credential, using a string of characters (letters, numbers, and other symbols) used to authenticate an identity or to verify access authorization.

Past-Post Wager – A wager that was made after the result of a wagering event is accepted or after the selected participant has gained a material advantage (e.g., a score).

Payment Processor (aka "Financial Service Provider") – An in-house or third-party entity who directly facilitates payment processing, including the depositing of funds to or withdrawing of funds from player accounts.

Pending Wager – A wager or portion of a wager placed in a given market that does not become part of a matched wager because there are not one or more available exchange wagers in that market with which to form one or more identically opposing wagers.

Perfecta (aka "Exacta") – A wager type in which the player picks the first and second place participants in a wagering event in the correct finishing order.

Performance-Based Wagering – A form of spectator wagering in which a spectator player places wagers on measurable outcomes derived from one or more host players' settled wagers (e.g., "win/lose", "total amount won on fifty wagers", "number of wagers won in three days", etc.).

Peripheral – An internal or external device connected to Retail Wagering Terminal that supports credit acceptance, credit issuance, player interaction, or other specialized functions.

Permitted Geofence – A virtual geographic perimeter delineated by a Global Positioning System (GPS), Radio-Frequency Identification (RFID), or other similar technology, within which the player may place a wager and/or perform account activities as required by the regulatory body.

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PII, *Personally identifiable information* – Sensitive information that identifies, relates to, describes, or can reasonably be linked to a player, including, but not limited to, a player's full legal name, date of birth, residential address, contact information, full or partial government identification number (driver's license number, social security number, taxpayer identification number, passport number, or equivalent), personal financial information (debit instrument numbers, electronic payment account numbers, or equivalent), or other personal information as may be specified by the regulatory body.

PIN, *Personal Identification Number* – An authentication credential, using a numerical code associated with an individual and which allows secure access to a domain, account, network, system, etc.

Player Account (aka "Wagering Account") – An account maintained by an Event Wagering Operation for a player where information relative to wager and financial transactions are recorded on behalf of the player including, but not limited to, deposits, withdrawals, wagers, winnings, and balance adjustments. The term does not include an electronic payment account, or an account used solely by an Event Wagering Operation to track bonusing/promotional points or credits or similar benefits issued by an operation to a player which may be redeemed for merchandise prizes and/or services.

Player Account Manager – The hardware, software, firmware, communications technology, other equipment, as well as operational procedures used to create, manage, and track player accounts and history, and to provide player account functions, including account management, payments, wallets, and responsible gaming controls. The Player Account Manager may be a standalone system or integrated within another part of the Event Wagering System.

Player Application – The software used to take part in wagers and financial transactions with the Event Wagering System which, based on design, is downloaded to or installed on the Remote Player Device, run from the Event Wagering System which is accessed by the Remote Player Device, or a combination of the two. Examples of Player Applications include proprietary download software packages, html, flash, etc.

Player Attribute – Any specific and verifiable fact concerning a player or group of players which is based upon objective criteria relating to the player or group of players and which may be utilized to affect some prescribed action taken, or alteration made to wagering (e.g., wagering rule change, odds/payouts and prices change, or other configuration change related to the wager or wager outcome, etc.).

Player Interface – An interface application or program through which the individual views and/or interacts with the Remote Player Device or Self-Service Wagering Terminal to communicate their actions to the Event Wagering System.

Player Loyalty Program – A program that awards player loyalty points (or other comparable entitlement) to players, typically based on the volume of play or revenue received from a player.

Point Spread – A wager type in which a handicap, expressed as a number of points, goals, runs, rounds, or other scoring measure, is applied to one or more participants for wagering purposes.

Pool – An accumulated reservoir of monetary contributions.

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Printer – A Wagering Terminal peripheral that prints wager records and/or wagering instruments.

Prepaid Access Instrument – A card, code, electronic serial number, mobile identification number, personal identification number or similar device used in conjunction with an Event Wagering System that allows player access to funds that have been paid in advance and can be retrieved or transferred at some point in the future through such a device.

Progressive Jackpot – A monetary award or "jackpot payoff" that increases generally based on a function of wagers or some other metrics.

Prohibited Player Activity – Suspicious player activity prohibited by internal control procedures, wagering rules, or applicable laws or regulations. These may include, but are not limited to, cheating, fraud, theft, embezzlement, identity misrepresentation, money laundering, terrorist financing, use of funds derived from illegal activity, unauthorized player assistance, match-fixing or wagering event manipulation, misuse of insider information, payment fraud, identity theft, account takeover or misuse, or other activity that compromises the integrity of event wagering.

Proposition Wager (aka "Prop Bet") **–** A wager type in which the player wagers on the occurrence or non-occurrence of a specific result of actions within a wagering event not directly involving the wagering event's final results.

Protocol – A set of rules and conventions that specifies information exchange between devices, through a network or other media.

Proxy – An application that "breaks" the connection between client and server. The proxy accepts certain types of traffic entering or leaving a network and processes it and forwards it. This effectively closes the direct path between the internal and external networks, making it more difficult for an attacker to obtain internal addresses and other details of the internal network.

Quinella – A wager type in which the player picks the first and second place participants in a wagering event, but not necessarily in the finishing order.

Rake, Commission, or Fee – A percentage or fixed amount deducted by the Event Wagering Operation from a prize pool, wager, or entry fees as its revenue, rather than wagered against players.

Randomness – The observed unpredictability and absence of pattern in a set of elements or events that have definite probabilities of occurrence.

Remote Player Device – A player-owned device operated either on an in-venue wireless network or over the internet that at a minimum will be used for the execution or formalization of wagers placed by a player directly. Examples of a Remote Player Device include a personal computer, mobile phone, tablet, etc.

Remote Wagering – Event wagering conducted using Remote Player Devices on an in-venue wireless network or over the internet, depending on the implementations authorized by the regulatory body.

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Replay Attack – The capture and reuse of previously valid location data, geolocation results, or successful geolocation checks to falsely satisfy a subsequent geolocation check.

Restricted Bonusing/Promotional Credits (aka "Non-Cashable Bonusing/Promotional Credits") – Bonusing/Promotional amounts that either are not redeemable for cash or cannot be cashed out until a wagering requirement or other restrictions associated with the credits is met.

Restricted Player Funds – Player funds that are not redeemable for cash, including restricted bonusing/promotional credits.

Retail Wagering – Event wagering conducted using Retail Wagering Terminals located within a Wagering Venue.

Retail Wagering Terminal – An electronic device that converts communications from the Event Wagering System into a human interpretable form and converts human decisions into communication format understood by the Event Wagering System.

Risk – The likelihood of a threat being successful in its attack against a network or system.

RNG, *Random Number Generator* – A computational or physical device, algorithm, or system designed to produce unpredictable values in a manner indistinguishable from random selection.

Rooting – Attaining root access to the operating system code to modify the software code on the mobile phone or other Remote Player Device or install software that otherwise would not be allowed to install.

Secure Communication – Communication that provides the appropriate confidentiality, authentication, and content integrity protection.

Self-Service Wagering Terminal – A kiosk or other equipment that at a minimum will be used for the execution or formalization of wagers placed by a player directly and, if supported, may be used for redemption of wager records and other authorized activities.

Sensitive Information – Information that shall be handled in a secure manner, such as PII, authentication credentials, wagering data, validation numbers, secure seeds and keys, and other data which is of a sensitive nature.

Server – A running instance of software that is capable of accepting requests from clients, and the computer that executes such software. Servers operate within a Client-Server Architecture, in which "servers" are computer programs running to serve the requests of other programs ("clients"). In this case the "server" would be the Event Wagering System and the "clients" would be the Remote Player Devices.

Single-Game Wager – A wager type in which the player wagers on a single wagering event, rather than on multiple wagering events.

Source Code – A text listing of commands to be compiled or assembled into an executable computer program.

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Spectator Wagering – A form of wagering in which a spectator player's wagering activities are tied to a host player's wagers on wagering events, with details of the host player's wagers accessible to all spectator players.

Sponsored Player (aka "Proposition Player" or "Shill") – A player who is hired by the Event Wagering Operation or other entity to participate in event wagering, and who wagers using personal funds and/or funds provided directly or indirectly by the operation or other entity.

Straight Wager – A wager type in which the player wagers on a single wager selection that is not combined with any other wager selection for payout purposes.

Suspicious Player Activity – Activity, pattern, or condition involving wagering, markets, player accounts, transactions, communications, devices, networks, or related activity that may indicate coordinated player activity, prohibited player activity, automated abuse, and/or other integrity concerns. These may include, but are not limited to, irregular wagering patterns, abnormal or structured wagers or wagering activity, unusual wagering volumes, timing anomalies, rapid changes in wagering behavior, material swings or changes in odds/payouts or prices, market suspensions, abuse of bonusing/promotional offers, or behavior inconsistent with normal player activity.

Teaser – A wager type that combines two or more wager selections, typically involving point spreads or over/unders, in which the player receives an adjusted spread or total for each selection in exchange for reduced odds or payout.

Third-Party Service Provider – An entity who acts on behalf of an operator to provide services used for the overall conduct of event wagering.

Threat – Any circumstance or event with the potential to adversely impact network operations (including mission, functions, image, or reputation), assets, or individuals through a system via unauthorized access, destruction, disclosure, modification of information, and/or denial of service. Also, the potential for a threat-source to successfully exploit a system vulnerability.

Time Stamp – A record of the current value of the Event Wagering System date and time which is added to a message at the time the message is created.

Touch Screen – A video display device that also acts as a player input device by using electrical touch point locations on the display screen.

Trifecta – A wager type in which a player wins by selecting the first, second, and third place participants in a wagering event in the correct finishing order.

Unauthorized Access – A person gains logical or physical access without permission to a network, system, application, data, or other resource.

Unauthorized Player Assistance – The use of bots, scripts, and other unauthorized player software, which may include, automated tools, external systems, real-time analytical tools, or prohibited decision-making aids to generate, recommend, execute, or influence wagers or wagering strategies in violation of the wagering rules.

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Unrestricted Bonusing/Promotional Credits (aka "Cashable Bonusing/Promotional Credits") – Bonusing/Promotional amounts that are redeemable for cash.

Unrestricted Player Funds – Player funds that are redeemable for cash, including unrestricted bonusing/promotional credits.

Virtual Event Wagering – A form of wagering that allows for the placement of wagers on simulations of computer-generated wagering events, or on previously recorded wagering events, as allowed by the regulatory body.

Virtual Participant – The athlete or other entity that competes in a virtual wagering event.

Virus – A self-replicating program, typically with malicious intent, that runs and spreads by modifying other programs or files.

Virus Scanner – Software used to prevent, detect and remove computer viruses, including malware, worms and Trojan horses.

Voided Wager (aka "Void Wager") **–** A wager that was not valid at the time it was placed or a wager that was valid at the time it was placed but has since become invalid for reasons, including but not limited to the change in eligibility status of a participant or subject of the wager.

Voucher – A wagering instrument which can be redeemed for cash or used to subsequently redeem for credits.

VPN, *Virtual Private Network* – A logical network that is established over an existing physical network and which typically does not include every node present on the physical network.

Vulnerability – Software, hardware, or other weaknesses in a network or system that can provide a "door" to introducing a threat.

Wager (aka "Bet") **–** Any commitment of credit, currency, or other representation of value by a player on one or more wager selections within markets associated with a wagering event. Where a purchase affects the outcome, odds/payouts, or prices of a wager, it is treated as a wager.

Wager Category – A high-level classification of wagers based on how odds are established, how players interact, and how payouts are determined, describing the underlying wagering model rather than the specific market offered. Examples include fixed odds wagering, pari-mutuel wagering, exchange wagering, wagering pools, live-event wagering, and any other category of wagering approved by the regulatory body. A single wager may fall within multiple categories depending on its characteristics (e.g., a live-event wagering fixed odds wager).

Wager Record (aka "Wagering Ticket" or "Betslip") **–** A printed ticket or electronic message confirming the acceptance of one or more wagers.

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Wager Selection – A specific result or option chosen by the player within a market upon which a wager is placed. A wager selection represents the player's prediction of the result of a market and forms the basis for determining the outcome and settlement of the wager (e.g., Team A to win, over 2.5 goals, a specific player to score).

Wager Type – A specific form or instance of a wager within a wager category, determined by the particular result, condition, or structure of the wager, including how one or more wager selections are combined, evaluated, and settled across one or more markets. Wager types include, but are not limited to single-game wagers, teasers, moneyline, point spreads, over/under, win/place/show, perfecta, trifecta, quinella, parlays, proposition wagers, straight wagers, and any other type of wagers approved by the regulatory body.

Wagering Event – A sporting event or game, competition, contest, match, race, or other occurrence or type of activity approved by the regulatory body upon which wagers may be offered.

Wagering Instrument – A printed or virtual representation of value, other than a chip or token, including coupons and vouchers. A virtual wagering instrument is an electronic token exchanged between a player's device and a Retail Wagering Terminal for credit insertion or redemption.

Wagering Platform (aka "Betting Server" or "Wager Aggregator") – The hardware, software, firmware, communications technology, other equipment, as well as operational procedures used to host event wagering and/or aggregate wagering content, as well as drive the features common to wager offerings, wager configurations, data sources, reporting, etc. The Wagering Platform may be a standalone system or integrated within another part of the Event Wagering System.

Wagering Pools – A wager category where players contribute to a common prize pool, and payouts are determined based on the distribution of the pool among winning players, often relative to the number of correct selections or rankings.

Wagering Rules (aka "House Rules") – Any written, graphical, and auditory information compiled by the Event Wagering Operation for the purpose of summarizing portions of the internal control procedures and other information necessary to inform the public of the functionality of event wagering.

Wagering Venue – A physical location or site where retail wagering activities take place, such as casinos, racetracks, off-track-betting parlors, gaming halls, or other similar facilities where Retail Wagering Terminals are installed.

Wi-Fi – The standard wireless local area network (WLAN) technology for connecting computers and electronic devices to each other and/or to the internet.

Wi-Fi Injection – The use of synthetic, spoofed, replayed, or otherwise manipulated Wi-Fi signals or access point data to falsify or influence device location data.

Win/Place/Show – A wager type in which the player wagers on a selected participant to finish in a specified position. A "win" wager requires the participant to finish first; a "place" wager requires the participant to finish first or second; and a "show" wager requires the participant to finish first, second, or third, subject to the applicable rules of the wagering event and wager type.

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