

PLAYER PROTECTION SYSTEMS

City Gaming use IHL's SmartHub technology to manage all areas of protection of players from gambling related harm.

Every venue is equipped with a tablet device which allows easy logging of all player interaction related events. These include the following :

- a/ Self Exclusion
 - o The IHL Smart Exclusion system works in conjunction with the Bacta Multi Operator Self Exclusion System which ensures that details of customers wishing to exclude from operators using either system are automatically recorded on both systems. This is a requirement of the Gambling Commission
- b/ Self Exclusion Breaches
 - o Self Exclusion breaches are closely monitored and customer who persistently attempt to breach their Self Exclusion Agreement are identified and appropriate action taken
- c/ Age Verification Challenges
 - o The numbers of Age Verification challenges made is monitored closely and where inconsistencies are highlighted, the appropriate management action is taken.
- d/ Customer Interactions
 - o Every customer interaction recorded is reviewed on a weekly basis by the Commercial team and interactions/incidents of concern are reported to the senior management team. Where a customer shows clear signs of difficulty with their gambling, this is reported back to the Operations team to follow up as necessary.
- e/ Incidents including those requiring police assistance/intervention
 - o Every other type of incident recorded is reviewed weekly and where further action is required, this is reported out to the Operations team.

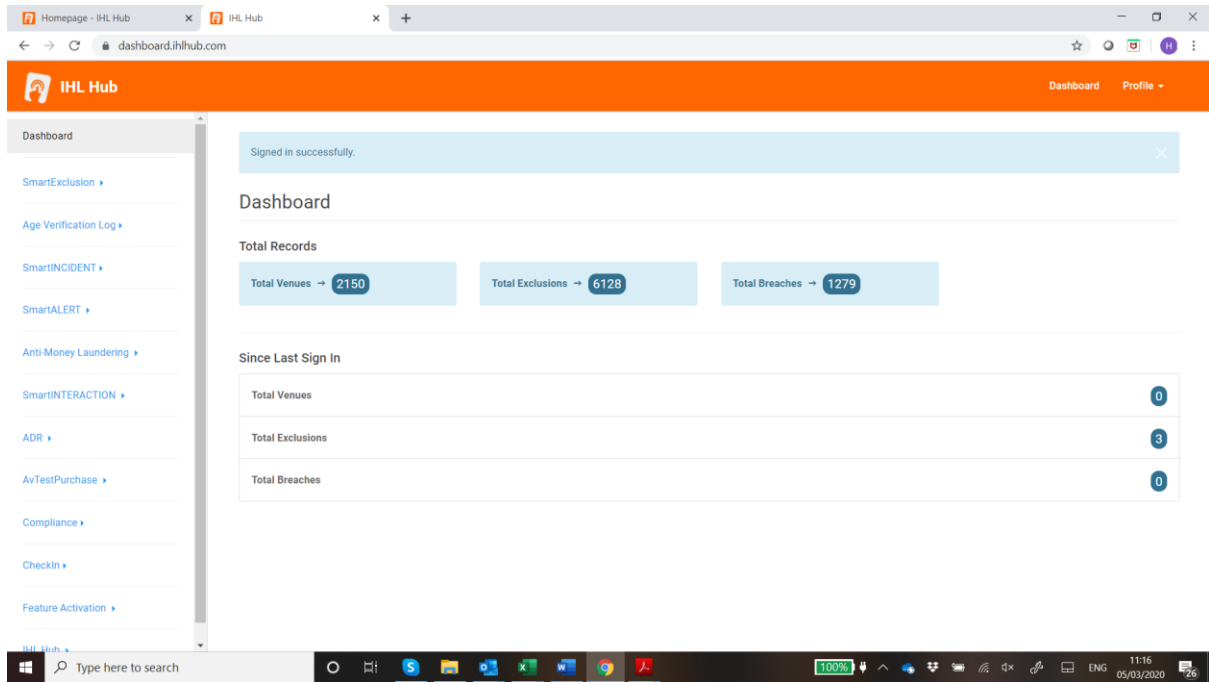
The following is an extract from IHL literature which offers a further outline into the operation and features of the system



SmartHUB – The Support Hub for the Gaming Industry

IHL Tech was formed in 2015 and has supplied the High Street gaming sector with self-exclusion and many other functions since April 2016.

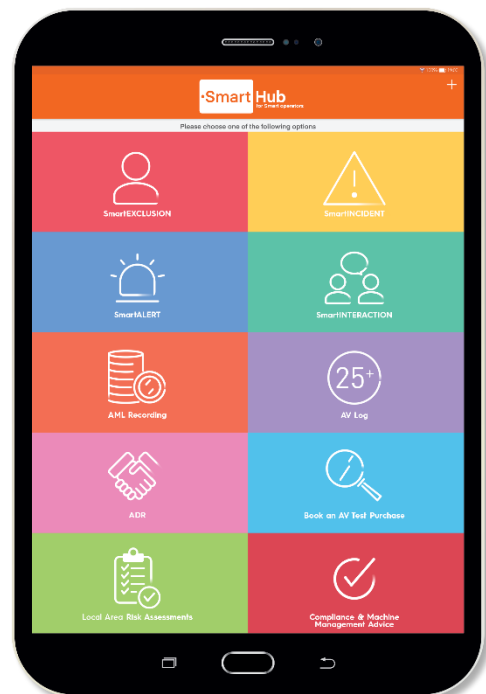
SmartHUB allows the operator to effectively remove paper logs from their premises and store information centrally, securely and importantly compliantly with the General Data Protection Regulation 2016/679. A locked down tablet replaces the traditional pen and paper and a back-end reporting portal gives you access to all the information you require.



A digital log has numerous advantages of a paper log

- Collating accurate and legible logs
- Standardising understanding and approach
- Central and local visibility
- KPI management to ensure all venues are at a single standard

All the logs allow the operators to comply with the current License Conditions and Code of Practice issued by the UK Gambling Commission.



SmartHUB is used by the majority of large AGC and Bingo licensed premises in the UK and is widely accepted as the most accurate and user-friendly solution. AGC operators including Cashino (160+ venues), Playnation (c80% of UK holiday parks), Roadchef use SmartHUB, along with over 100 SMEs. The Bingo Association provide the Silver package of SmartHUB to their entire membership which includes Buzz Bingo (formerly Gala), Mecca Bingo and Beacon Bingo plus 120 High Street Bingo Licenses and 100+ Licensed Holiday Parks.

Whilst SmarHUB provides digital logs, reports and visibility to operators we also provide, through registered 3rd parties Alternative Dispute Resolution and Test purchasing, one visit per calendar year. Each of which is a requirement of a premise license.

SmarHUB doesn't take away any responsibility of the operator, it simple makes being compliant easier, gives them greater visibility of their venues activity and allows them to report on and review instantly.

TEST PURCHASING THROUGH CHECK POLICY

City Gaming employ a third party test purchase provider to carry out regular Age Verification testing across all venues. This is carried out by CheckPolicy who also carry out AV testing on behalf o Bacta.

All tests are monitored and reported on a weekly basis. Test failures are investigated within 48 hours of the test report being received and remedial action/disciplinary action taken.

The following chart shows the 2019 results from the businesses within the City Gaming group.

