

Application number: 2665

Applicant name: BetIndex Limited

Application details

Reason for application New to Gambling Industry - Based outside GB

Upload a Multi-Jurisdictional Business Form

Document Type	
MJBF	
No documents uploaded	

Contact details

Please provide details of the person who you would like to be the main contact for all matters relating to the Operating Licence (if the application is successful).

Title	
First name(s)	
Last name	
Position	Director

Contact details

Main contact number	
Work number	
Email address	

Correspondence address

Please provide a correspondence address for the main contact you have named above. Please note the address provided in this section must be in the United Kingdom.

Address

Contact details for the application

Is the person listed above going to be the contact for the application process?

Yes

Alternative contact

Title	
First name(s)	
Last name	

Contact details

Main contact number	
Email address	

Operator details - entity information

Operator name

BetIndex Limited

Entity type

Private Limited Company

Company purpose and background details

BetIndex is a wholly owned subsidiary of Fame Ventures Limited, a UK company that holds a UK Remote Operator's Licence and a UK Software Remote Licence. BetIndex will licence the use of gaming software from Fame Ventures in order to operate an online and mobile focused, reality-based football game under the brand name FootballIndex. Fame Ventures has developed the gaming software and will operate the servers and platform on which the game will sit. BetIndex's target market is the United Kingdom where it will address a huge and impassioned audience of football fans with a unique and compelling proposition; players will be able to "bet" and "back" their football heroes rather than betting on transient one-off events. Please refer to the business plan for full details of the operation.

Operator previous names

Has the Applicant (or any related company) ever been known by another name (previous names, aliases and company name changes)?

No

Business registration details

Date of incorporation
17-Jul-2015
Registration number
119040
Place of incorporation
Jersey
Country of incorporation
United Kingdom

Registered office address

Please provide the registered address of the Applicant

Charter Place, 23 - 27 Seaton Place St Helier, Jersey JE1 1JY United Kingdom

Head office address

Address Charter Place, 23 - 27 Seaton Place St Helier, Jersey JE1 1JY United Kingdom

Previous head office address

Has the Applicant's Head Office been located at any other address(es) in the past 5 years?

No

Contact details for head office

Main contact number	
Fax number	
Email address	
Website	

Applicant entity documentation

The Gambling Commission requires identification documents for the Applicant entity. If the Applicant is a partnership we require the Partnership Agreement and any amendments thereto. If the applicant is a registered organisation such as a private limited company, a non-commercial society, a corporate body, etc we require the Certificate of Incorporation, Constitution, Memorandum of Association, Articles of Association and/or any other constitutional documents, as applicable, and any amendments thereto. Please provide the required identification documents for the Applicant entity below by clicking the Browse button against the relevant document type to choose the file you want to upload. If you have multiple documents for a document type, please click Browse again against that document type to select the further file you want to upload.

Document Type	
Any Amendment Documents	
No documents uploaded	
Articles of Association	
No documents uploaded	
Certificate of Incorporation of Change of Name	
No documents uploaded	
Certification of Incorporation	
BetIndex Cert of Inc.pdf	
Constitution	
No documents uploaded	
Memorandum of Association	
No documents uploaded	
Other Constituent Documents	
No documents uploaded	
Other Written Constitution	
No documents uploaded	
Trust Documents	
No documents uploaded	

Public listings

Is the Applicant or its related companies publicly listed?

No

Other branches

Does the Applicant have any branch offices that are not the Applicant's registered business address and are not the address from which the Applicant delivers its principal activities?

No

Application Fees

Total application fees (payable on application)	£3,259.00
Total first years annual fees (payable 30 days after issue)	£13,529.00
Total subsequent years annual fees (payable before anniversary)	£13,529.00

Product	Fee Category	Cost
Remote		
	-	62.250.00
General betting (standard) (real events)	F	£3,259.00
Total operating licence costs		£3,259.00
Total operating licence discount		-£0.00
Total application fees (payable on application)		£3,259.00

Product	Fee Category	Cost
Remote		
General betting (standard) (real events)	F	£13,529.00

First year annual fees totals	
Total cost	£13,529.00
Total first year discount	-£0.00
Total first annual fees	£13,529.00

Subsequent annual fees totals	
Total cost	£13,529.00
Total subsequent years discount	-£0.00
Total subsequent annual fees	£13,529.00

Premises

Does the Applicant have any other premises not already named in this application which are or will be used to deliver non-remote gambling services or facilities?

No

Gambling licences

Does the applicant currently hold, have any Applications pending for, or previously held, a gambling licence, permit, or authorisation with any other regulator or government agency in the past 5 years?

Yes

Name of government agency	Application number
Jersey Gambling Commission	N/A
Name of government agency Jersey Gambling Commission	
Country United Kingdom	
Type of licence or permit Remote Gambling Operator's Licence	
Application or licence number N/A	
Disposition Pending	
Date of disposition 25-Jun-2015	

Policy and licence documentation

Policy Documentation

Please supply copies of any available documents relating to the Applicant's policies and procedures and copies of current gambling licences held in other jurisdictions, by clicking the "Browse" button and then selecting a file to upload. These documents should demonstrate how the Applicant will meet and comply with the licensing objectives of the Gambling Act 2005 and are appropriate for all of the Applicant's planned licensed activities.

The Gambling Act 2005 has three licensing objectives which licensees must uphold:

- Preventing gambling from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime;
- Ensuring that gambling is being conducted in a fair and open way; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Gambling Commission has to be satisfied that an Applicant understands its responsibilities to meet the licensing objectives and has arrangements in place to provide gambling services or facilities in a manner consistent with those licensing objectives.

In order to demonstrate that the Applicant has policies and procedures in place to meet the requirements of the licensing objectives and the Licence Conditions and Codes of Practice (LCCP), the Gambling Commission requires the following information:

- The Applicant's written policies and procedures to ensure that:
 - The Applicant's business will be protected from being a source of crime and disorder, being associated with crime and disorder, or being used to support crime (for all Applicants);
 - Gambling will be conducted in a fair and open way. This should include procedures for the
 protection of customer funds and complaints and disputes procedures. The name of the
 Applicant's alternative dispute resolution entity must also be provided where applicable;
 - Children and other vulnerable persons will be protected from being harmed or exploited by gambling (for all Applicants);
- Policies and procedures for the promotion of social responsibility in gambling (for all Applicants);
- An explanation of how the Applicant will satisfy the primary gambling activity code provision (for Non-remote Bingo, Casino and General betting (standard) Applicants only);
- An explanation of how the Applicant will implement its policies and procedures including how the Applicant intends to review and assess its policies and working practices in light of any changes to the LCCP or developments within the gambling industry (for all applicants);

The policies and procedures should highlight any potential risks to the licensing objectives and the business itself, and detail how the Applicant will manage those risks. They should also detail any contingency plans that will be in place to address such risks.

Wherever possible the policies and procedures should include flow diagrams/process maps which show how the procedures work in practice, where the escalation and decision making points are, and who is responsible for making the decisions.

For remote licence Applicants, if the Applicant's key equipment and/or staff and/or business is based outside Great Britain, the Applicant must include additional information to satisfy the Commission as to its ability to comply with Licence conditions 15.1 and 15.3. Amongst other things, this information should include details of how the Applicant will ensure it can:

- provide the Commission with access to complete and accurate data on demand and satisfy all data requests from the Commission
- provide the Commission with access to key staff, including within Great Britain if necessary.

Licence Documentation

If the Applicant currently holds any gambling licences, permits, or authorisations with any other regulator or government agency, you must provide copies.

Document Type	
Gambling Licences	
No documents uploaded	
Policies and Procedures	
BetIndex Data Protection Policy.pdf	
BetIndex Game Rules.pdf	
BetIndex Privacy Policy.pdf	
BetIndex Terms & Conditions.pdf	
BetIndex AML Manual.pdf	
BetIndex Jersey Anti-Bribery Gifts & Charitable and Political Donations Policy.pdf	
BetIndex Jersey Anti-Bribery Principles and Guidance.pdf	
BetIndex Jersey Hospitality and Gifts Policy.pdf	
BetIndex Jersey Whistleblowing Policy.pdf	
BetIndex Remote Gambling Policies relating to UK Licence Conditions and Codes of Practice Final.pd	lf
BetIndex Complaints Procedure.pdf	

Alternative dispute resolution entity

Please provide the name of the organisation used as the Applicant's alternative dispute resolution entity. We require the details of all of the alternative resolution entities used for all of the licence activities the Applicant currently offers (if applicable) and those the Applicant is applying for as part of this application.

Independent Betting Adjudication Service PO Box 62639 London EC3P 3AS

Domain names

Does the Applicant have any domain names for websites (including mobile sites or mobile device applications) from which it trades or will trade in reliance on the licence from the Gambling Commission, if granted?

Yes

Domain name	Status	White Label	Date from	
www.footballindex.co.uk	Inactive		08-Oct-2014	

Payment processing

Please provide details of the different payment methods the Applicant will accept for gambling services or facilities, along with name of the organisations who process the payments and who the organisations are regulated by (if applicable). If the Applicant offers a number of different payment methods which are processed by different organisations, please ensure it is clear which payment method is processed by which organisation and who they are regulated by (if applicable).

Please provide details of the payment methods accepted by the Applicant for gambling services or facilities.

Visa Credit Card Visa Debit Card MasterCard Credit Card

Please provide the name(s) of the organisation(s) who processes the payments made to the Applicant for gambling services or facilities.

SecureTrading Financial Services Limited, 227 Psaila Street, Birkirkara, BKR 9078, Malta

Please provide the name(s) of the regulators of the payment processing organisation(s) identified in response to the question above.

Malta Financial Services Authority

Remote key equipment

Equipment Type	Town/City	Operator	Provider
Virtual Event and Game Pages	London	Amazon Web Services	Amazon Web Services

Equipment location

60a Holborn Viaduct London EC1A 2FD

Licence activities

United Kingdom

General Betting Standard (Virtual)

Equipment Operator

Amazon Web Services

Equipment Provider

Amazon Web Services

Equipment Provider address

60a Holborn Viaduct London EC1A 2FD United Kingdom

Is the equipment provider detailed above licensed by a regulator?

No

Disaster recovery

Yes

Disaster Recovery Address

60a Holborn Viaduct London EC1A 2FD United Kingdom

Type of Disaster Recovery Equipment

Backup Information and Continued Operations

Equipment Type	Town/City	Operator	Provider
Settling	London	Amazon Web Services	Amazon Web Services

Equipment location

60a Holborn Viaduct

London

EC1A 2FD

United Kingdom

Licence activities

General Betting Standard (Real)

Equipment Operator

Amazon Web Services

Equipment Provider

Amazon Web Services

Equipment Provider address

60a Holborn Viaduct London EC1A 2FD **United Kingdom**

Is the equipment provider detailed above licensed by a regulator?

Disaster recovery

Yes

Disaster Recovery Address 60a Holborn Viaduct London EC1A 2FD **United Kingdom**

Type of Disaster Recovery Equipment
Backup Information and Continued Operations

Equipment Type	Town/City	Operator	Provider
Gambling Transaction Records	London	Amazon Web Services	Amazon Web Services

Equipment location

60a Holborn Viaduct London

EC1A 2FD

United Kingdom

Licence activities

General Betting Standard (Real)

Equipment Operator

Amazon Web Services

Equipment Provider

Amazon Web Services

Equipment Provider address

60a Holborn Viaduct London

EC1A 2FD United Kingdom

Is the equipment provider detailed above licensed by a regulator?

No

Disaster recovery

Yes

Disaster Recovery Address

60a Holborn Viaduct London

EC1A 2FD

United Kingdom

Type of Disaster Recovery Equipment

Backup Information and Continued Operations

Equipment Type	Town/City	Operator	Provider
Virtual Event State	London	Amazon Web Services	Amazon Web Services

Equipment location

60a Holborn Viaduct London

EC1A 2FD

United Kingdom

Licence activities

General Betting Standard (Real)

Equipment Operator

Amazon Web Services

Equipment Provider

Amazon Web Services

Equipment Provider address

60a Holborn Viaduct

London EC1A 2FD United Kingdom

Is the equipment provider detailed above licensed by a regulator? $\ensuremath{\mathsf{No}}$

Disaster recovery

Yes

Disaster Recovery Address 60a Holborn Viaduct London EC1A 2FD **United Kingdom**

Type of Disaster Recovery Equipment Backup Information and Continued Operations

Remote documentation

In order to demonstrate that the business has policies and procedures to meet the requirements of the Remote Gambling and Software Technical Standards the Applicant must provide the following information:

- Policies and procedures detailing how the Applicant will comply with the Remote Gambling and Software Technical Standards and the Testing Strategy for Compliance with Remote Gambling and Software Technical Standards;
- An operational model map which shows the location and provider/operator of all systems and activities used by the Applicant to deliver gambling services and facilities;
- A system diagram and commentary which details the end-to-end process from when a person registers, through the gambling process, to the payout of winnings with a commentary of the activities that happen at each stage;
- For remote gambling software applicants, policies and procedures detailing how the Applicant supplies gambling software via remote communication (if applicable);
- The name, address and licence number of all of the organisations who provide gambling software and/or business to business (B2B) gambling provision to the Applicant. If the Applicant is using a third party gambling software supplier or B2B gambling provider (eg poker network), these companies will be required to hold the relevant licences from the Gambling Commission. If the supplier is currently licensed by a government regulator we also require the name of the regulator (if applicable);
- The Applicant's most recent information security report, where applicable.
- Remote licence Applicants, whose remote key equipment is based outside Great Britain, must provide details of how they have made sure the jurisdiction in which they locate the key equipment allows the Applicant to comply with the Commission's requirement that the Commission has access to data when required.
- Remote licence applicants applying under transitional arrangements (i.e operators who already lawfully target British consumers under a licence, permit or other authorisation from an EEA or white listed jurisdiction) must complete the 'Existing Games Information' template with details of all games they currently offer to British consumers.

Further guidance regarding the information we require can be found by clicking the help at the top of the page.

If you have multiple documents for each type of document to upload please ensure it is clear what each document relates to and that all relevant documents have been uploaded.

Document Type		
Existing Games Information		
No documents uploaded		
Gambling Software Supply Details		
BetIndex Gambling Software Supply Details.pdf		
Information Security Report		
No documents uploaded		
Operational Model Map		
No documents uploaded		
System Diagram		

BetIndex System Diagram.pdf	
Technical Standards and Testing Strategy	
BetIndex Testing Strategy Policy.docx	
BetIndex Remote gambling and software technical standards.pdf	

Management details

Do you believe the Applicant qualifies for Small Scale Operator exemption (SSO)?

No

Name	Date of Birth	Position
		Director
Role	Main Role	Additional Role
Overall strategy and delivery of gambling	No	Yes
Financial planning, control and budgeting	Yes	No
Regulatory compliance	No	Yes
Marketing and commercial development	No	Yes
Gambling related IT provision and security	No	Yes
Nominated Officer for Anti-Money Laundering and Associated Purposes	Yes	No
Major investor, owner or partner	N/A	N/A
Percentage equity share		

Approved by the Gambling Commission Yes

Please indicate in what capacity this individual is currently approved? PML

Please provide their Personal Management Licence number.

Approved by another jurisdiction/regulator Yes

Please provide the name of the jurisdiction(s) and/or regulator(s). Approved as Key Staff by the Isle of Man Gambling Supervision Commission

Name	Date of Birth	Position
		Director
Role	Main Role	Additional Role
Overall strategy and delivery of gambling	No	Yes
Financial planning, control and budgeting	Yes	No
Regulatory compliance	No	Yes
Marketing and commercial development	No	Yes
Gambling related IT provision and security	No	Yes
Nominated Officer for Anti-Money Laundering and Associated Purposes	N/A	N/A
Major investor, owner or partner	N/A	N/A
Percentage equity share		

Please indicate in what capacity this individual is currently approved? PML

Please provide their Personal Management Licence number.

Approved by another jurisdiction/regulator Yes

Please provide the name of the jurisdiction(s) and/or regulator(s). Approved as Key Staff by the Isle of Man Gambling Supervision Commission

Name	Date of Birth	Position
		Director
Role	Main Role	Additional Role
Overall strategy and delivery of gambling	Yes	No
Financial planning, control and budgeting	Yes	No
Regulatory compliance	N/A	N/A
Marketing and commercial development	Yes	No
Gambling related IT provision and security	N/A	N/A
Nominated Officer for Anti-Money Laundering and Associated Purposes	N/A	N/A
Major investor, owner or partner	Yes	No
Percentage equity share		

Please indicate in what capacity this individual is currently approved? $\ensuremath{\mathsf{PML}}$

Please provide their Personal Management Licence number.

Approved by another jurisdiction/regulator No

Name	Date of Birth	Position
		Head of Regulatory Compliance
Role	Main Role	Additional Role
Overall strategy and delivery of gambling	N/A	N/A
Financial planning, control and budgeting	N/A	N/A
Regulatory compliance	Yes	No
Marketing and commercial development	N/A	N/A
Gambling related IT provision and security	N/A	N/A
Nominated Officer for Anti-Money Laundering and Associated Purposes	N/A	N/A
Major investor, owner or partner	N/A	N/A
Percentage equity share		

Please indicate in what capacity this individual is currently approved? $\ensuremath{\mathsf{PML}}$

Please provide their Personal Management Licence number.

Approved by another jurisdiction/regulator No

Name	Date of Birth	Position
		Licensing Officer
Role	Main Role	Additional Role
Overall strategy and delivery of gambling	N/A	N/A
Financial planning, control and budgeting	N/A	N/A
Regulatory compliance	N/A	N/A
Marketing and commercial development	N/A	N/A
Gambling related IT provision and security	Yes	No
Nominated Officer for Anti-Money Laundering and Associated Purposes	N/A	N/A
Major investor, owner or partner	N/A	N/A
Percentage equity share		

Please indicate in what capacity this individual is currently approved? $\ensuremath{\mathsf{PML}}$

Please provide their Personal Management Licence number.

Approved by another jurisdiction/regulator No

Shareholders

The Gambling Commission needs to know who has a financial interest in the business including individuals and entities who have a 3% or more equity share in the Applicant.

The Key Personnel with Equity section below will detail any key personnel who have already been identified as holding an equity share percentage in the Applicant entity (if applicable).

The Additional Shareholders section below should be used to provide the details of any other individuals or companies who have a 3% or more equity share in the Applicant.

Any key personnel who have already been identified in the Management section as holding an equity share percentage in the applicant entity will appear in the table below.

Name	Equity Share

Additional shareholders

Do any additional shareholders have a 3% or more share in the Applicant?

Yes



Name	Туре	Equity Share
Company name		
Date of registration		
Registration number (eg Compan	y Number)	
Name of organisation company is	registered with (i.e. Co	mpanies House)
Percentage equity share		
Has this individual or company be and/or regulator?	een approved by, or will	l be seeking approval from, another jurisdiction

Name	Туре	Equity Share
Company name		
Date of registration	1	
Registration numb	er (eg Company Number)	
Name of organisat	ion company is registered with (i.e. Co	ompanies House)
Percentage equity	share	
Has this individual and/or regulator?	or company been approved by, or wi	II be seeking approval from, another jurisdiction

Name	Туре	Equity Share
Company name		
Date of registration		
Registration number (eg Co	ompany Number)	
Name of organisation comp	oany is registered with (i.e	e. Companies House)
Percentage equity share		
Has this individual or compand/or regulator?	any been approved by, o	or will be seeking approval from, another jurisdiction



Name	Туре	Equity Share
Company name		
Date of registration		
Registration number	(eg Company Number)	
Name of organisation	company is registered with (i.e. Co	mpanies House)
Percentage equity sh	are	
Has this individual or and/or regulator?	company been approved by, or will	be seeking approval from, another jurisdiction



Name	Туре	Equity Share
Name		
Date of birth		
Has this individual	been approved by the Gambling Con	nmission?
Percentage equity	share	
Has this individual and/or regulator?	or company been approved by, or wi	II be seeking approval from, another jurisdiction



Ownership interests and beneficial interests

Does or will any person have an interest in the ownership or other beneficial interest in the Applicant (eg as a security holder)?

No

Other investors

Have any individuals, not already named, invested in the Applicant over the past five years (excluding equity), and/or have any interest in the Applicant?

No

Other associated individuals or companies

Does the Applicant have any other company or individual acting on its behalf in the state or jurisdiction of application or elsewhere?

Yes

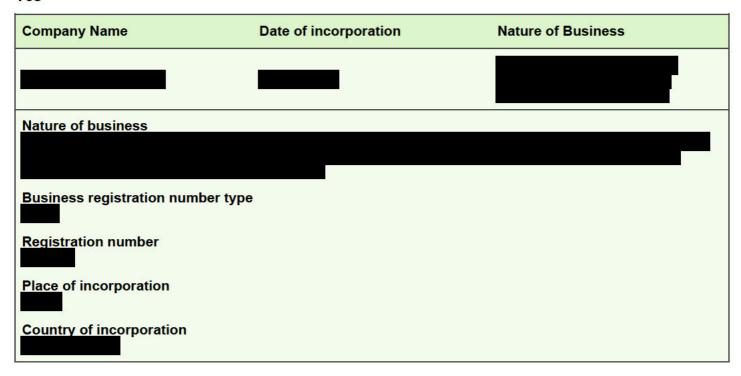
Name	Details
Name	
Details	

Name	Details
Name	
Details	

Companies related to applicant

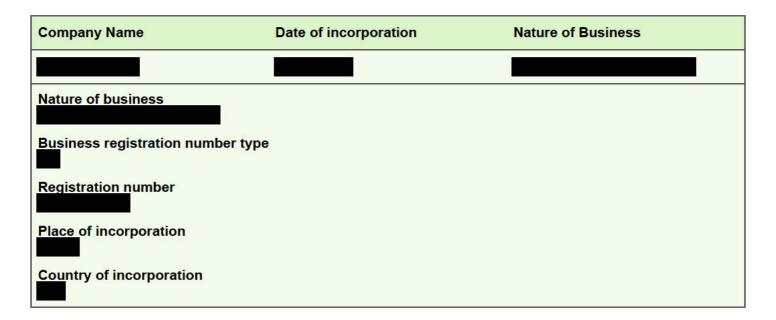
Are there any companies which are related to the Applicant as intermediary, holding and subsidiary companies?

Yes



Company Name	Date of incorporation	Nature of Business
Nature of business		
Business registration number	type	
Registration number		
Place of incorporation		
Country of incorporation		

Company Name	Date of incorporation	Nature of Business
Nature of business		
Business registration number type	•	
Registration number		
Place of incorporation		
Country of incorporation		



Date of incorporation	Nature of Business
oe .	

Company Name	Date of incorporation	Nature of Business
Nature of business		
Business registration number typ	е	
Registration number		
Place of incorporation		
Country of incorporation		

Please provide a copy of the corporate family tree showing current corporate structure detailing the relationships of ALL related companies

Document Type

Corporate Structure

BetIndex Group Structure Diagram.pptx

Joint venture

Has the Applicant entered into any joint venture arrangements with any other organisation within the past 5 years in relation to the development, ownership, management, or operation of any gambling related business?

Share capital and securities

Does the company have share capital and securities?

Yes

Share capital

Type of shares	Average value of shares	Description	
Ordinary Shares	0.01	BetIndex Limited has issued 173,382 shares with a par value of 0.01p per share.	
Description BetIndex Limited has issued 173,382 shares with a par value of 0.01p per share.			

Number of issued shares 173382

Former management

Does the Applicant have any former officers, Directors, Partners, Trustees and Company Secretaries who have ceased to hold office during the last 5 years?

Former businesses

Are there any former businesses which are not identified in previous questions and which the Applicant or its related companies have engaged for the past 5 years?

Management structure and entity ownership

The Gambling Commission needs to understand the structure of the Applicant organisation. This includes how the Applicant will operate on a daily basis, who the key personnel are, who has a financial interest in the Applicant, who owns the Applicant, and if the Applicant is part of a group, the details of all entities within the group and details of the relationships between those entities.

In order to establish these aspects the Gambling Commission requires the following documentation:

- An up to date management structure;
- The current ownership structure; and
- A group structure (if applicable).

Further guidance regarding the information we require can be found by clicking the help icon next to the Document Type.

If you have multiple policies and procedures documents to upload ensure all relevant documents have been uploaded.

Document Type	
Group Structure	
BetIndex Group Structure Diagram.pdf	
Management Structure	
BetIndex Management Structure.pdf	
Ownership Structure	
No documents uploaded	

Applicant bank accounts

Does the Applicant currently hold, or previously held, any bank, building society, or similar financial institution accounts in the past 5 years?

Yes

Name of bank	Branch	Account number	Authorised signatories
Nedbank Private Wealth	Jersey	TBC	

Other bank accounts

During the last 5 years, has the Applicant, its parent company or any subsidiary maintained any bank account, whether domestic or foreign, which is not reflected on the Company's books or records?

No

Employee and 3rd party knowledge

Do any present or former, employees or third parties have knowledge or information concerning the above question?

Nominee accounts

During the last 5 years , has the Applicant, its parent company or any subsidiary maintained any numbered account or any account in the name of a nominee for the Company?

No

Employee and 3rd party knowledge

Do any present or former, employees or third parties have knowledge or information concerning the above question?

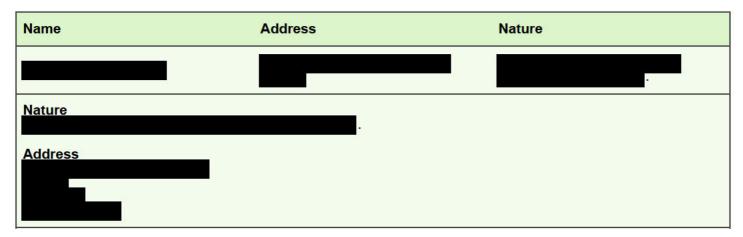
Securities held by the Applicant

Does the Applicant or its related companies hold any securities or similar investments in any gambling related business?

Contracts and agreements

Does the Applicant have contracts or agreements of USD \$250,000 or more in value with any persons or has the Applicant received USD \$250,000 or more in goods or services from any persons in the past six months?

Yes



Auditors and accountants

Has the Applicant engaged any auditors or accountants over the past 5 years?

Loans obtained by the Applicant

Has the Applicant obtained a loan or financial agreement from any person, company, or institution within the past $5\ \text{years}$?

Loans and donations

During the last 5 years, has the Applicant, its parent company, subsidiary, related companies or any director, employees or third parties of the Company performed the following transactions:

- I. donated or loaned funds for the purpose of opposing or supporting any government, political party, candidate or committee, whether domestic or foreign?
- II. donated or loaned property or anything of value for the purpose of opposing or supporting any government, political party, candidate or committee, whether domestic or foreign?
- III. made any loans, donations or other disbursements to any of its directors, officers, employees or any third parties for the purpose of reimbursing such individuals for political contributions, whether domestic or foreign?

No

Employee and 3rd party knowledge

Do any present or former, employees or third parties have knowledge or information concerning the above question?

Debt information

Does the Applicant have any debt that has yet to be repaid or debt forgiveness of an amount equal to or above 100,000 USD for the past 5 years?

Financial documentation

The Gambling Commission has to consider whether an applicant has the necessary financial resources available to be able to provide gambling services or facilities in a manner consistent with the licensing objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. In order to assess the financial aspect of the application the Gambling Commission requires the financial documentation detailed below.

Further guidance regarding the information we require can be found by clicking the help icon next to the document type.

If you have multiple documents for each type of document to upload please ensure it is clear what each document relates to and that all relevant documents have been uploaded.

Document Type	
Annual Reports supplied to regulators	
No documents uploaded	
Annual Returns	
No documents uploaded	
Audited and Financial Projections	
No documents uploaded	
Bank Statements	
No documents uploaded	
Bonus or Profit Sharing and Pension Schemes	
No documents uploaded	
Business Plan	
Business Plan Final - BetIndex.pdf	
Credit Reports	
No documents uploaded	
Financial Projections	
BetIndex Financial Projections Final.xlsx	
ndividuals Compensation	
No documents uploaded	
nsolvency, administration or liquidation report	
No documents uploaded	
Proof of Funding	

No documents uploaded	
Public debt and equity offering Reports supplied to regulators	
No documents uploaded	
Public Debt and Equity Offerings	
No documents uploaded	

Creditor or composition agreements

Has the Applicant or any related company entered into any agreement or arrangements with its creditors to forestall receivership, liquidation or insolvency?

Appointed administrators

Has an administrator, receiver, receiver and manager, liquidator or provisional liquidator been appointed to the Applicant or its related companies due to insolvency?

Charges as a result of administration

Were there any charges brought against the Applicant, or any related companies of the Applicant or officers of the Applicant or a related company as a result of an Administrator, Receiver or Liquidator being appointed?

Bankruptcy or insolvency

Has the Applicant or any related companies, had any petition under any bankruptcy or insolvency law, filed by or against it in the last 5-year period?

No

Has the Applicant or any related companies, sought relief under any bankruptcy or insolvency law in the last 5-year period?

Insolvency investigations

Has the Applicant or its related companies been investigated or issued show cause notices, consent notices, consent agreements, fines and other disciplinary actions by a casino, gaming or betting regulatory body due to insolvency?

Legal advisers

Has the Applicant engaged any legal advisers, solicitors and/or legal consultants in the jurisdiction during the last 5 years?

Yes

Name of legal adviser	Country	Start date	Service rendered
Joelson Wilson LLP	United Kingdom	02-Jun-2014	Provided website Terms & Conditions
Services rendered Provided website Terms & Address Joelson Wilson Llp 30 Portland Place London W1B 1LZ United Kingdom	& Conditions		
Start date 02-Jun-2014			

Investigations

Is the Applicant subject to any current, previous or pending investigation by any statutory, regulatory or governing body in respect of any gambling activity, gambling licence, certificate or permit held in the last 5 years?

Investigation refusals

Has the business entity, any of its subsidiaries, directors, trustees or officers ever refused to testify before, to answer a question asked by, or to take a polygraph exam administered by any governmental agency, court, committee, royal commission, charging body or grand jury (if applicable) or investigatory body (municipal, state, county, province, federal, national, etc.)?

Government inquiry

Has the Applicant, or its related companies, been the subject of derogatory findings arising out of a royal commission, judicial inquiry or other government inquiry?

Stock exchange breaches

Has the Applicant or its related companies been fined, suspended or reprimanded for breaches of any stock exchange listing rules, including judgement, order, consent decree or consent order pertaining to violation or alleged violation of federal antitrust, trade regulation, securities laws or similar laws of any state, province or country entered against the Applicant?

Civil litigation

Is the Applicant, its parent or any subsidiary, presently a party to any existing civil litigation, whether in this state or in another jurisdiction? Do not include any litigation in which the damages may not reasonably be expected to exceed USD\$100,000, or litigation in which damages may be expected to exceed USD\$100,000, but which claims against the business entity which are fully and completely covered under an insurance policy held by the business entity with a licensed insurance carrier.

Insurance claims

Has the Applicant made any insurance claims of an amount or above USD\$500,000 within the last 5 years?

Bribes and kickbacks - company

During the 5 last years, has the Applicant, its parent company, subsidiary, director, officer, employee or any third party who is acting on behalf of the Company, made or received any bribe or kickback or made or received any payments alleged to have been bribe or kickback to any employee, company or organisation, to obtain favourable treatment?

Bribes and kickbacks - government

During the 5 last years, has the Applicant, its parent company, subsidiary, director, officer, employee or any third party who is acting on behalf of the Company, made or received any bribe or kickback or made or received any payments alleged to have been bribe or kickback to any employee, company or organisation, to obtain favourable treatment?

Criminal proceedings

Definitions for purposes of this question *"Charge" includes any indictment, complaint, information, summons, or other notice of the alleged commission of any "offence".
*"Offence" includes all felonies, crimes, high misdemeanours, disorderly persons offences, and petty

disorderly persons offences.

Has the business entity or any of its subsidiaries, directors, trustees, or officers ever been indicted, charged with or convicted of a criminal or disorderly persons offence or been a party to or named as an unindicted co-conspirator in any criminal proceeding in any jurisdiction? Answer yes even if: (1) the business entity, its directors, trustees, or officers did not commit the offence charged; (2) the charges were dismissed; (3) the business entity, its directors, trustees, or officers were not convicted; or (4) the charges or offences happened a long time ago.

Information request

Question	Response
the Applicant will produce copies of income tax returns including confirmation by tax authorities that the Applicant has complied with tax laws	Yes
the Applicant will produce copies of minutes of shareholders and directors meetings	Yes
the Applicant will produce any information relevant to the published Financial Statements	Yes
the Applicant will authorise the release of any other information reasonably required by an officer of the Gambling Commission or person authorised by the Gambling Commission	Yes

Other information

Please provide any other information which you believe the Gambling Commission would reasonably expect notice of, or that you would like to be taken into account when considering this application.

Please refer to an and the application for Fame Ventures Limited. We have already had communication with the in relation to this application.

Administration

Public register

The Gambling Commission is required to publish the fact that the Applicant has made an application for an Operating Licence on a public register. Whilst the application is pending, the Applicant may object to the details appearing, or may request that reduced address details be displayed on the register. If the application is granted the details **must** be displayed. However, you can request that only reduced address details are shown (i.e. just town/city).

Does the Applicant have any objections to details appearing on the public register?		
No		

Online administrator

The Gambling Commission's eServices – Operator system allows a licensed operator to pay any outstanding invoices, view their operating licence(s), submit key events, LCCP notifications, regulatory returns, lottery submissions and make applications online. This individual is referred to as an online administrator and they must have a valid email address as this will be used as part of their login

Are you going to be the online administrator, if the application is granted?

Yes

Financial year end

Please confirm the date of the end of the Applicant's financial year.

Financial year end date
31-Jul

Declaration

The following declaration must be signed in all cases by a duly authorised officer of the Applicant.

Should the information provided in relation to this application cease to be correct, or if there are any changes in the information provided between the date the application was submitted and the date it is determined, it is the Applicant's responsibility to advise the Gambling Commission immediately. Failure to do so could result in any licence subsequently issued being reviewed and possibly revoked. Should the Applicant hold a licence in any other jurisdiction and any investigation or regulatory action has commenced then this will be considered as part of the overall application assessment. It is the Applicant's responsibility to advise the Gambling Commission immediately of any commencement of any action.

The Gambling Commission may require confirmation or further information from third parties in respect of any evidence or documentation I/we have provided in support of this application. I/We agree to grant authorisation for the Gambling Commission to request and receive information about me/us from those third parties.

I agree to provide authority for the Gambling Commission to obtain bank references.

I understand that any misrepresentation or failure to reveal information or grant any authorisation requested may be deemed to be sufficient cause for the refusal or revocation of a licence.

I certify that the financial projections provided have been approved and adopted by the board (or equivalent) and that the accounts provided have been approved by a certified independent accountancy body/individual and adopted by the board (or equivalent), and that the Directors (or equivalent) have a reasonable expectation that the licensed entity has adequate resources to continue in operational existence for the foreseeable future.

I certify that all documentation provided is either original or a true copy.

I certify to the best of my knowledge that the information given in this application is complete and correct in every respect and that all material information has been included.

I agree to notify the Gambling Commission should any of the information given in this application change.

I understand that if the Applicant receives a licence, that fact will be placed on a public register.

First name(s)	
Last name	
Position	
Please read the below statement and tick the box to confirm your understanding and agreement:	
I certify that I am a duly authorised officer of the Applicant with the authority to sign this declaration and submit this application.	
I understand that in recording my name and position, that record has the same force and effect as a signature affixed by hand.	
Date of declaration	

Authorisation of release The application is not complete until the Authorisation for release of information document has been signed by an appropriate authorised person and received by the Gambling Commission.

If you have completed a copy of this document, electronically, please upload it below.

Please click the "Confirm Declaration" button below to progress to the next page and finalise the application

Docume	ent Type
Authoris	sation of release form
Authpris	ation for Release.pdf

Payment

Fees Summary

The table below shows a summary of the licence activities that the Applicant is applying for. Please confirm that the activities below are correct before proceeding further.

If the Applicant is applying for multiple activities, they may be eligible for a discount on the application fee. If this is the case, it will be shown as an operating discount below.

Product	Fee Category	Cost
Remote		
General betting (standard) (real events)	F	£3,259.00
Total operating licence costs		£3,259.00
Total operating licence discount		-£0.00
Total application fees (payable on application)		£3,259.00

Pay online

If you wish to pay the application fee via credit or debit card, you may do so online.

Would you like to pay online?

No

Please forward payment for the above fee as soon as possible.

The Gambling Commission will not commence processing the application until payment has been received.

Payments will only be accepted in Pounds Sterling (GBP) and we are unable to accept American Express or Visa Electron payments.

Please ensure that any cheque payments are made payable to Gambling Commission.

If you wish to pay via BACS transfer, please contact the Gambling Commission on +44 (121) 230 6666 for further details.

Application 2665: Associated Document Summary

Filename	Associated Entity
Authprisation for Release.pdf	Authorisation of release form
Business Plan Final - BetIndex.pdf	Business Plan
BetIndex Cert of Inc.pdf	Certification of Incorporation
BetIndex Group Structure Diagram.pptx	Corporate Structure
BetIndex Financial Projections Final.xlsx	Financial Projections
BetIndex Gambling Software Supply Details.pdf	Gambling Software Supply Details
BetIndex Group Structure Diagram.pdf	Group Structure
BetIndex Management Structure.pdf	Management Structure
BetIndex AML Manual.pdf	Policies and Procedures
BetIndex Complaints Procedure.pdf	Policies and Procedures
BetIndex Data Protection Policy.pdf	Policies and Procedures
BetIndex Game Rules.pdf	Policies and Procedures
BetIndex Jersey Anti-Bribery Gifts & Charitable and Political Donations Policy.pdf	Policies and Procedures
BetIndex Jersey Anti-Bribery Principles and Guidance.pdf	Policies and Procedures
BetIndex Jersey Hospitality and Gifts Policy.pdf	Policies and Procedures
BetIndex Jersey Whistleblowing Policy.pdf	Policies and Procedures
BetIndex Privacy Policy.pdf	Policies and Procedures
BetIndex Remote Gambling Policies relating to UK Licence Conditions and Codes of Practice Final.pdf	Policies and Procedures
BetIndex Terms & Conditions.pdf	Policies and Procedures
BetIndex System Diagram.pdf	System Diagram
BetIndex Remote gambling and software technical standards.pdf	Technical Standards and Testing Strategy
BetIndex Testing Strategy Policy.docx	Technical Standards and Testing Strategy