

# GAMBLING POLICY for NFL Personnel 2018

The NFL is strongly committed to maintaining the integrity of the NFL, its games, Clubs, players, coaches, and other League and Club personnel. Gambling, particularly on NFL games or other sports, presents potential risks to the integrity of our competition and can negatively impact team cohesion. We therefore owe it to our fans and everyone associated with our League to take all appropriate steps to safeguard our game against possible threats from illegal gambling as well as gambling in a legal, regulated context.

This NFL Gambling Policy ("Policy") sets forth the standards of conduct expected of all persons associated with our League: it is intended clearly to set forth permissible and prohibited activities and serve as a guide to promote compliance.

#### 1. **DEFINITIONS**

As used herein, the following terms shall have the meanings indicated:

**Gambling** – the wagering of money and/or something else of value, on an event with an uncertain outcome with the intent of winning additional money and/or thing(s) of value. Generally, gambling involves all three of the following elements:

- » *Prize* Any item of value that is offered to the winner. This could include money, other goods or services and/or any other thing of value, regardless of the amount of such value.
- » *Chance* The "winner" of the prize is uncertain at the time the wager is made. The use or exercise of skill, strategy, and/or knowledge, unless it *completely* negates the element of chance, does not convert an activity into something other than gambling.
- » *Consideration* In order to receive a chance to win the prize, the participants provide or risk something of value.

Examples of activities that constitute gambling include, but are not limited to, betting on sporting events or other athletic competitions, including placing wagers at sports books and similar establishments; betting on card, dice or video games (including poker, in any of its variations); playing casino games (e.g., slot machines, blackjack, keno, roulette, craps); betting on animal racing or fighting; or participating in "sports pools."

Gambling includes *commercial gambling* (whether for profit, charity or anything else) that involves third parties (e.g., bookies, dealers, "the house"), as well as *private wagers* between teammates, family and friends, or others. Gambling also includes, without limitation, wagers made in person, remotely (via telephone or the Internet), or through a third-party "surrogate."

Participation in League, Club or partner-sponsored skills competitions (e.g., racquetball tournaments, "Club Olympics" events) for prizes generally is not considered to be gambling or a gambling-related activity, provided that there is no wagering on the outcome.

Participation in or promotion of "casino nights" or similar events for charity generally is not considered to be gambling or a gambling-related activity and is permissible, provided that no money or items of value are wagered and all proceeds from the event are donated to a legally-recognized charity.

Participation in legally operated fantasy sports games (*i.e.* contests in which participants assemble imaginary teams comprised of real players from professional sports and compete based on the statistical performance of the real players) generally is not considered to be gambling or a gambling-related activity for purposes of this policy, but the participation by NFL Personnel in fantasy *football* games is subject to certain limitations as set forth in Section 5 below.

**NFL Personnel** – Unless otherwise limited, this Policy applies to all full- and part-time Club and League personnel including League office employees, players, owners, coaches, athletic trainers, game officials, security personnel, consultants, Club employees, game-day stadium personnel and other staff.

**Sportsbook** – Any brick-and-mortar, mobile or online establishment that accepts bets on sporting events and pays out winnings.

### 2. GAMBLING ACTIVITIES

### No Illegal Gambling

NFL Personnel are strictly prohibited from participating in or facilitating any form of illegal gambling.

### Restrictions on Legal Gambling

NFL Personnel are restricted or prohibited from engaging in the following gambling-related activities, regardless of whether such activities are legal:

- 1. *Betting on Football:* All NFL Personnel are prohibited from placing, soliciting, or facilitating any bet, whether directly or indirectly through a third-party, on any NFL game, practice or other event. This includes betting on game outcome, statistics, score, performance of any individual participant, or any other kind of "proposition bet" on which wagering is offered.
- 2. Betting on Other Sports: All NFL Personnel other than Players are <u>further</u> prohibited from placing, soliciting, or facilitating bets on any other professional (e.g., NBA, MLB, NHL, PGA, USTA, MLS), college (e.g., NCAA basketball), international (e.g., World Baseball Classic, World Cup), or Olympic sports competition, tournament or event.
- 3. *Game Fixing:* NFL Personnel shall not throw or fix any NFL game or in any way influence its outcome, statistics, or score; or otherwise manipulate or attempt to manipulate any other aspect of any NFL game for a gambling-related purpose. This includes accepting a bribe or otherwise agreeing to throw, fix or influence a game, as well as failing to report any bribe, offer or attempt to do so.

- 4. *Best Effort:* NFL Personnel must always give their best effort. Failing to give best effort in any NFL game, or soliciting, encouraging or inducing anyone not to give best effort for a gambling-related purpose is strictly prohibited.
- 5. *Inside Information and Tipping:* Unless duly authorized, NFL Personnel are prohibited from using, disclosing or providing access to confidential, non-public information regarding: (a) any NFL game or event; (b) any participating individual's availability for or performance in any NFL game; or (c) any other conditions material to any NFL game for a gambling-related purpose, whether directly or through another person. This includes failing to report any request for, disclosure of, or possible disclosure of such information.
- 6. *Gambling in the Workplace:* NFL Personnel shall not engage in any form of gambling while in any Club or League setting including, without limitation, locker rooms, practice or office facilities, team buses, trains, flights, or hotels, or while traveling on Club or League business. For clarity, playing cards or other casino-type games is permitted as long as nothing of value is wagered.
- 7. *Sportsbooks:* NFL Personnel shall not enter into, utilize, or otherwise visit a Sportsbook at any time during the NFL playing season.<sup>1</sup>
- 8. Endorsements and Promotional Appearances: NFL Personnel are prohibited from using or allowing others to use one's name and/or image directly to promote, advertise, or publicize gambling-related enterprises (as defined in Section 3 of this Policy); or making personal, promotional appearances on behalf of any entity in a casino gaming area or Sportsbook.
- 9. *Associations:* NFL Personnel shall not maintain social, business and/or personal relationships with persons generally known to be professional, problem, and/or sports gamblers, in a manner that discredits the reputation of the NFL, NFL Players or the game.
- 10. Gifts and Services: NFL Personnel may not accept a complimentary room, service, or other gift from a casino or other gambling-related establishment if its value exceeds \$250. Any items accepted (other than de minimus food & beverages generally offered to all patrons) must be appropriately documented and verifiable upon request. Soliciting gifts of any value is never permissible.

# Permitted Non-Sports Gambling

NFL Personnel may visit and place non-sports wagers at legally-operated casinos and horse or dog racing tracks on personal time, including during the season.

## 3. EMPLOYMENT AND OWNERSHIP INTERESTS

NFL Personnel shall not work for, own or operate, in whole or in part, directly or indirectly, individually or through any business organization, any casino (whether or not such casino operates a Sportsbook or otherwise accepts wagering on sports), or other gambling-related enterprise, including, without limitation, any "on-line," computer-based, telephone, or Internet gambling service, card room, lottery, slot machine operation, horse or dog racing track, off-track betting service, as well as any advisory service such as a publication or "tout service," whether or not such service addresses professional football or any other team sport.

3

<sup>&</sup>lt;sup>1</sup> This is not intended to prohibit simply passing through a Sportsbook to access a permissible area of a casino or hotel complex.

In the case of enterprises conducting multiple lines of business, an enterprise shall be considered a "gambling-related enterprise" for purposes of this Policy if one-third or more of the enterprise's gross revenues or operating profit in any of the last three years is attributable to gambling-related operations.

NFL personnel may own shares in mutual funds or other passive accounts that include gambling-related enterprises within their portfolios.

### 4. FANTASY FOOTBALL

NFL Personnel may not (i) accept prizes with a value in excess of Two Hundred Fifty Dollars (\$250) in any season-long fantasy football game, (ii) participate in any "daily" or other similar short duration fantasy football game that offers any prize (regardless of value), or (iii) participate in any fantasy football game (including daily, season-long, or any other game format) in a jurisdiction where such participation is prohibited by applicable law or regulation. These prohibitions are intended to avoid any appearance of impropriety which may result from participation in fantasy football games by individuals perceived to have an unfair advantage due to their preferential access to information.

# 5. RELATED POLICIES

Clubs and other NFL-related entities subject to this Policy may elect to adopt and enforce additional and/or supplemental gambling-related policies, with the understanding that this Policy sets forth minimum standards which may not be modified or altered without the express approval of the Commissioner. In the event of any conflict or inconsistency between this Policy and any less restrictive provisions of any such additional or supplemental policy, the provisions of this Policy shall govern.

#### 6. REPORTING OBLIGATIONS

Gambling Debt: Any NFL Personnel who incurs gambling debts above \$10,000 to any person(s) or gambling-related enterprise(s) shall promptly report such fact to the NFL Security Department at (800) NFL-1099.

Policy Violations: All NFL Personnel are reminded of their affirmative obligation to report violations or potential violations of this Policy, including improper approaches or solicitations by others, to the NFL Security Department at (800) NFL-1099. Reports also may be made to the *Protect the Shield* hotline at (888) 291-6472 or http://ProtecttheShield.com.

Duty to Cooperate: All NFL Personnel are required to fully cooperate with any investigation conducted by or on behalf of the NFL with respect to this Policy. All NFL Personnel are further prohibited from soliciting or inducing others from complying with their duty to cooperate.

Retaliation: Retaliation in any form against an individual who reports a violation of this Policy, or who assists in the investigation of a reported violation, is itself a serious violation of this Policy. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Questions regarding the application of this Policy may be directed to Adolpho Birch, Sabrina Perel or Todd Jones at the League office.

### 7. VIOLATIONS

Apparent or alleged violations of this Policy by NFL Personnel will continue to be decided by the Commissioner or his designee on a case-by-case basis. Violations of this Policy constitute conduct detrimental to the League and will subject the involved Club and/or person(s) to appropriate disciplinary action by the Commissioner. Such disciplinary action may include, without limitation, severe penalties, up to and including a fine, termination of employment and/or banishment from the NFL for life.

# 8. ASSISTANCE AND RESOURCES

If you or someone you know has a gambling problem, toll-free and confidential help is available 24 hours a day, 7 days a week through the National Council on Problem Gambling. Call or text (800) 522-4700 or go to www.ncpgambling.org/chat.