

12 December 2023

Sportsbet Pty Ltd  
GPO Box 4755, Melbourne VIC 3001

ABN 87 088 326 612  
Tel +61 3 8631 6000 • Fax +61 3 9654 1999

BY EMAIL

Level 5, 65 Pirrama Road  
Pyrmont NSW 2009

Dear [REDACTED]

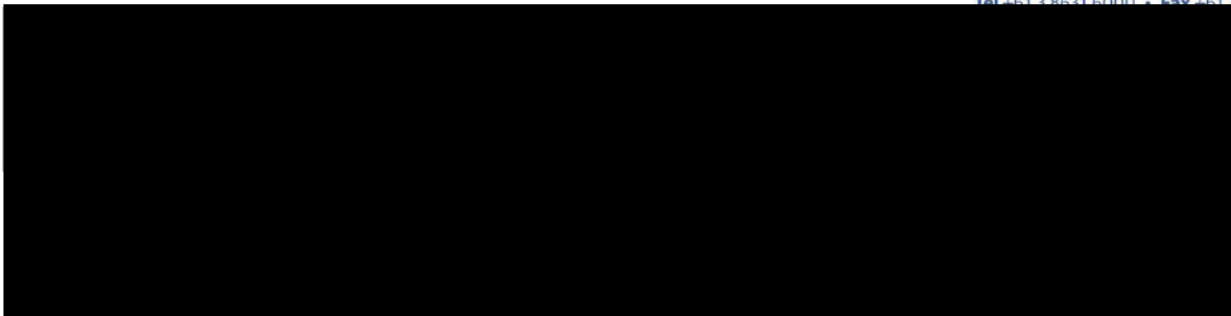
**Final report into the Fast Codes investigation - Contravention of the Interactive Gambling Act 2001 (Act) - Your reference: ACMA2022/353-16**

We refer to:

1. Sportsbet's letter to the ACMA dated 18 October 2023 describing the [REDACTED] proposed to bring the Fast Codes service into compliance the ACMA's view on the requirements under the Act for a 'telephone betting service'; and
2. the ACMA's letter to Sportsbet dated 1 November 2023 in response to Sportsbet's proposal of 18 October 2023 in which the ACMA confirmed it has determined to take no further action at this time, subject to Sportsbet complying with certain conditions in its proposal; and
3. the letter from the ACMA to Sportsbet dated 27 November 2023 enclosing the ACMA's Final Investigation Report (**Report**) and inviting Sportsbet to comment on the publication of the report in terms of section 180 of the *Broadcasting Services Act 1992*, and
4. the telephone conversation between [REDACTED] of the ACMA and [REDACTED] of Sportsbet on 6 December 2023 regarding this matter and the above correspondence.

As foreshadowed, the purpose of this letter is to, first, provide an update on the [REDACTED] deployed since our letter of 18 October 2023 and, second, respond to the ACMA's letter of 27 November 2023 and invitation to comment on the publication of the Report.

**Update on the deployment of recent [REDACTED]**



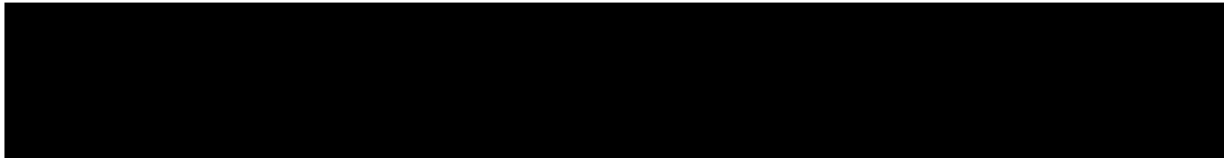
### Sportsbet's response to the invitation to comment on Report publication

Second, Sportsbet thanks the ACMA for providing it with a copy of the Report and the opportunity to make a submission regarding its publication. Having considered the matter, for the reasons set out below, Sportsbet does not propose to make a submission that the Report should not be published. Sportsbet also accepts the ACMA's position that the substantive issues in this matter have been determined.

However, Sportsbet respectfully requests a brief addition to the Report to reference the agreed [REDACTED] which was proposed (and has now been undertaken) by Sportsbet to bring the Fast Codes service into compliance the ACMA's view on the requirements under the Act.

Sportsbet is grateful for the manner in which the ACMA has engaged with Sportsbet during the course of the investigation, the helpful guidance provided by the ACMA on its compliance requirements, and the confirmation provided by the ACMA that it would take no further action against Sportsbet subject to Sportsbet deploying the [REDACTED] it proposed.



If the ACMA is open to considering this request, we have included below a draft sentence for its consideration (which is also marked up in the attached Word version of the Report):



Sportsbet submits that the inclusion of the above sentence (or something similar) will most accurately reflect the outcome of this investigation and, importantly, explain why it is that Sportsbet's Fast Code service remains available on its platforms for live single bets.

We thank the ACMA for its consideration of this matter. We would be happy to discuss it or Sportsbet's [REDACTED] with the ACMA if that would be of assistance.

Yours sincerely

  
  
Acting General Counsel  
Sportsbet

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<sup>1</sup> As described on page 3 of the letter from the ACMA to Sportsbet dated 15 August 2023.