

**ENFORCEABLE UNDERTAKING GIVEN TO THE AUSTRALIAN COMMUNICATIONS
AND MEDIA AUTHORITY BY DABBLE SPORTS PTY LTD (ACN 641 982 425) UNDER
SECTION 114 OF THE REGULATORY POWERS (STANDARD PROVISIONS) ACT
2014 (Cth)**

1. Persons giving the undertaking

This Undertaking is given to the Australian Communications and Media Authority by Dabble (ACN 641 982 425) under section 114 of the *Regulatory Powers (Standard Provisions) Act 2014*.

2. Definitions and Interpretation

2.1. In this Undertaking:

- 2.1.1. **ACMA** means the Australian Communications and Media Authority.
- 2.1.2. **BetStop** means BetStop - The National Self-Exclusion Register.
- 2.1.3. **BetStop Obligations** means subsections 61LA, 61MB, 61MC and 61JP of the IGA.
- 2.1.4. **Board** means Dabble's Board of Directors or equivalent management body.
- 2.1.5. **Commencement Date** has the meaning given in clause 3.1.2.
- 2.1.6. **Dabble** means Dabble Sports Pty Ltd (ACN641 982 425).
- 2.1.7. **IGA** means the *Interactive Gambling Act 2001* (Cth).
- 2.1.8. **Implementation Plan** means the Dabble Board-approved plan referred to in clause 7.1, developed in response to the Independent Consultant's Report.
- 2.1.9. **Independent Consultant** means a qualified and independent consultant with expertise in audits relating to risk and compliance, processes, procedures, systems, governance and controls.
- 2.1.10. **NSER Register Rules** means the *Interactive Gambling (National Self-exclusion Register) Register Rules 2022*.
- 2.1.11. **Registered Individual** has the same meaning given in section 61GB of the IGA.
- 2.1.12. **Report** means the report referred to in clause 6.3.
- 2.1.13. **Review** means the review conducted by the Independent Consultant referred to in clause 6.1.

3. Term of the Undertaking

- 3.1. This Undertaking commences when:
 - 3.1.1. it has been executed by Dabble; and
 - 3.1.2. so executed, it has been accepted by the ACMA and written notification of that acceptance has been provided to Dabble (**Commencement Date**).
- 3.2. This Undertaking continues for a period of 24 months from the Commencement Date or until it is withdrawn by Dabble with the written approval of the ACMA, whichever is earlier.
- 3.3. This Undertaking may be varied by Dabble with the written consent of the ACMA.
- 3.4. Any notice or approval required or permitted to be given by the ACMA under this Undertaking must be in writing and may be given by any ACMA Authority member or by any ACMA staff member who is a member, or acting member, of the Senior Executive Service.

4. Background

- 4.1. On 24 April 2026, the ACMA notified Dabble that it had reasonable grounds to believe Dabble had sent regulated electronic messages to Registered Individuals,

failed to close or otherwise deal with licensed interactive wagering service accounts in accordance with subsections 61MB(5) and 61MC(5), and failed to include the prescribed BetStop information in regulated electronic messages, in contravention of subsections 61LA(2), 61LA(4), 61MB(5), 61MC(5) and 61JP(5) of the IGA.

- 4.2. Dabble acknowledges that the ACMA has made the findings referred to in clause 4.1 and, in response to the ACMA's concerns regarding Dabble's compliance with the BetStop Obligations, offers this Undertaking to the ACMA aimed at addressing future compliance with the BetStop Obligations.

5. Undertaking

Dabble undertakes to take the following specified actions to directed towards ensuring Dabble's compliance with the BetStop Obligations.

6. Independent Consultant

- 6.1. Dabble undertakes to appoint an Independent Consultant to review Dabble's current systems, processes and practices in order to assess the extent to which they have been designed to ensure:
- 6.1.1. Dabble does not send regulated electronic messages or cause them to be sent to an electronic address belonging to a registered individual, in compliance with section 61LA of the IGA
 - 6.1.2. licensed interactive wagering service accounts are closed as soon as practicable after an individual becomes a registered individual in compliance with sections 61MB and 61MC of the IGA; and
 - 6.1.3. Dabble complies with the requirements of Part 7 of the NSER Register Rules in accordance with section 61JP of the IGA,
- (the **Review**).
- 6.2. The Review will consider:
- 6.2.1. the steps taken by Dabble to develop and implement systems and processes to ensure compliance with the requirements set out in the clauses 6.1.1 to 6.1.3 and;
 - 6.2.2. any other terms of reference reasonably necessary for the Independent Consultant to assist in assessing Dabble's capability to comply with Part 7B of the IGA
- 6.3. Dabble undertakes to ensure that the Independent Consultant produces a report, relevant to the Review, making recommendations for improvements to, or maintenance of, Dabble's systems, processes and practices to ensure compliance with BetStop Obligations (the **Report**).
- 6.4. Dabble must seek written approval from the ACMA for the appointment of the proposed Independent Consultant within 30 business days after the Commencement Date. If the ACMA does not approve the choice of Independent Consultant, Dabble will repeat this process until it has the ACMA's written approval.
- 6.5. Dabble undertakes to appoint the Independent Consultant, and to provide written notification of that appointment to the ACMA, within 15 business days after the ACMA has given its written approval.
- 6.6. Dabble will require, as a term of the Independent Consultant's appointment, that the Independent Consultant provide the Report to the Board, and at the same time to

the ACMA, within six months of their appointment.

- 6.7. Subject to the ACMA's written agreement, Dabble may remove the Independent Consultant at any time and replace the Independent Consultant with a new Independent Consultant approved by ACMA. If the ACMA does not approve the choice of Independent Consultant, Dabble will repeat this process until it has the ACMA's approval.

7. Implementation Plan & Reporting

- 7.1. Dabble will:
- 7.1.1. within 60 business days of the date of the Report, develop and obtain Board approval of an Implementation Plan setting out the steps Dabble has taken, or will take, to implement the recommendations of the Independent Consultant in the Report, including applicable timeframes;
 - 7.1.2. within 10 business days after Board's approval of the Implementation Plan, provide a copy of the Implementation Plan to the ACMA; and
 - 7.1.3. ensure that throughout the implementation of the Implementation Plan, sufficient appropriately qualified compliance resources are allocated to support the implementation of the Implementation Plan.
- 7.2. The Implementation Plan does not need to address any recommendation of the Independent Consultant which the ACMA, on request from Dabble, specifically agrees in writing need not be implemented.
- 7.3. Dabble undertakes to comply with the Implementation Plan in accordance with the timeframes specified in the plan.
- 7.4. The Implementation Plan may be modified at any time subject to the ACMA's written approval.
- 7.5. Six months after the date on which Dabble provides the ACMA with a copy of the Implementation Plan, Dabble undertakes to provide a further written report to the ACMA detailing Dabble's progress against, and compliance with, the Implementation Plan, in accordance with the timeframes specified in the plan (including with respect to the systems, practices and processes implemented to prevent marketing being sent to registered individuals and to close accounts of registered individuals).

8. Ongoing assurance and reporting

- 8.1 Dabble undertakes to self-report to ACMA any potential or alleged instances of non-compliances with the BetStop Obligations within one month after Dabble becomes aware of such non-compliance. This undertaking to self-report includes reporting on:
- 8.1.1 any self-identified breach, including the details of the breach;
 - 8.1.2 any steps taken or proposed to be taken to investigate the breach;
 - 8.1.3 the cause of the non-compliance, if identified; and
 - 8.1.4 any remediation measures taken or proposed to be taken to remedy the breach.
- 8.2 Where an identified instance of non-compliance arises from a complaint received by Dabble, the report under clause 8.1 must also include details of the complaint, the steps taken to investigate the complaint and the outcome of that investigation,

to the extent known at the time of reporting.

9. Acknowledgments

9.1 Dabble acknowledges that:

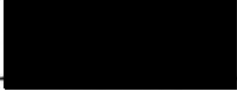
- 9.1.1 The ACMA will make this Undertaking publicly available, including by publishing it on the ACMA's website.
- 9.1.2 The ACMA may, from time to time, make public comment about this Undertaking and its terms which includes issuing a media release upon its execution by the ACMA.
- 9.1.3 The ACMA may, from time to time, publicly report on compliance with this Undertaking.

9.2 Dabble also acknowledges that:

- 9.2.1 The ACMA's acceptance of this Undertaking does not affect the ACMA's power to investigate and take compliance and enforcement action arising from conduct that is not the subject of this Undertaking or arising from future conduct.
- 9.2.2 This Undertaking in no way derogates from the rights and remedies available to any other person or entity arising from the alleged conduct that is the subject of this Undertaking.

Execution of the Undertaking

Signed/Executed by Tom Rundle as
authorised representative for Dabble
Sports Pty Ltd (ACN 641 982 425):



Signature

tom rundle Ceo

Name (insert title if relevant/ appropriate)
(print)

02-Sep-26

Date:

Accepted by the Australian Communications and Media Authority under section
114 of the *Regulatory Powers (Standard Provisions) Act 2014*:



Signature

CAROLYN
RIDGEWOOD

Name, Member (print)

Signature

Name, Member/General Manager (print)

OFFICIAL

Date [leave blank, ACMA to insert]: 3 September 2026