



<b>Legal Department</b>	
Responsible Gaming Policy	Revision Date: April 8, 2026
Effective Date: April 20, 2026	Approved by: Melanie Sims Frank

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## Introduction

The New York Racing Association, Inc. (“NYRA”), a New York not-for-profit corporation, is committed to fostering a Responsible Gaming environment that protects customers, empowers employees with the tools to identify and address gambling-related risks, and ensures compliance with applicable state and federal regulations.

NYRA recognizes that most customers gamble responsibly; however, some may experience personal, financial, or emotional challenges associated with gambling. NYRA aims to minimize these risks through training, education, safeguards, and robust reporting mechanisms.

## Purpose

This Policy establishes requirements that promote responsible gaming, prevent Problem Gambling, ensure safe, transparent, and ethical customer interactions, and provide clear processes for employees to follow. This Policy is designed to:

- Support NYRA’s mission to deliver world-class experience that advance the sport of horse racing with integrity, safety, and innovation.
- Uphold NYRA’s core values of safety, integrity, customer experience, innovation, and excellence.
- Align NYRA’s practices with national Responsible Gaming standards.
- Establish clear organizational roles and expectations.
- Mitigate risks associated with gambling through proactive controls and education.

## Regulatory and Statutory Requirements

This Policy aligns with:

- New York State and federal gaming regulations.
- NYRA’s licensing jurisdictions for NYRA Bets.
- Industry best practices, including guidance from the National Council on Problem Gambling (“NCPG”) and other applicable regulatory frameworks.

## Definitions

**Compliance Officers:** Joi Garner, General Counsel 718-659-2349 [jgarner@nyrainc.com](mailto:jgarner@nyrainc.com), Melanie Frank, Deputy General Counsel 516-240-5795 [mfrank@nyrainc.com](mailto:mfrank@nyrainc.com) and Iris Roberts, Director of Compliance, 718-659-3503 [iroberts@nyrainc.com](mailto:iroberts@nyrainc.com).

**Problem Gambling:** A disorder characterized by persistent and recurrent problematic gambling behavior that leads to significant personal, financial, or social consequences.

**Responsible Gaming:** The process of making informed gambling decisions within personal limits while minimizing risk.



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**Self-Exclusion:** The voluntary act by which an individual elects to prohibit themselves from accessing gambling services, wagering accounts, or designated gaming areas at NYRA tracks, facilities, or through NYRA Bets platforms for a defined period of time.

### Scope and Approach

This Policy applies to all NYRA employees and subsidiaries, including NYRA Bets, as well as all customers and vendors who interact with NYRA services at NYRA facilities, racetracks, or online platforms.

NYRA promotes awareness, education, and reporting mechanisms and requires that employees be trained to identify and manage Problem Gambling behaviors and to be familiar with available resources. This Policy cannot, and is not intended to, address every situation that may arise. Employees are responsible for acting lawfully and ethically in all business dealings, reporting any unlawful or unethical conduct, and seeking further guidance when in doubt.

### Policy Guidelines / Process

As a pari-mutuel wagering provider, NYRA requires all employees to complete Responsible Gaming training. This training defines responsible-gaming principles, reinforces NYRA's safeguards, and highlights available resources.

Moreover, NYRA offers focused training programs and reporting guidelines for customer-facing roles.

### Employee Training

NYRA's *Problem and Responsible Gaming Training* focuses on identifying problem gaming and promoting Responsible Gaming. The training teaches employees to:

- Define Responsible Gaming principles.
- Understand ways NYRA promotes safe gaming environments.
- Learn Problem Gambling behaviors.
- Identify resources available to help customers with Problem Gambling.
- Understand Self-Exclusion.

All employees must complete this training during onboarding and annually thereafter. NYRA also provides specialized guidance for customer-facing personnel on identifying and reporting Problem Gambling concerns.



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### Customer Education & Advertising

In developing marketing advertising programs, NYRA ensures that all materials are truthful, responsible, and respectful of individuals experiencing Problem Gambling. Marketing materials must never target individuals under the legal gambling age or self-excluded persons.

All advertisements must meet the strict advertising guidelines designed to guarantee that each advertisement remains responsible as outlined below:

- **Honesty/Fairness:** Advertising and promotional materials, and campaigns must be accurate and not misleading. All promotions and advertisements must also include relevant information that may be essential for the public to make informed choices.
- **Responsible Gaming:** Campaigns must include a responsible-play message and cannot suggest guaranteed or exaggerated winnings.
- **Protection of Minors:** Advertising must avoid themes or channels appealing to anyone under the legal gambling age. Appropriate age-verification controls and staff training are required. Employees must report any suspected instances of underage gambling and ensure appropriate steps are taken to prevent access.
- **Protection of self-excluded Individuals:** Self-excluded persons are removed from all marketing and promotional lists.

### Reporting Procedures

All concerns about a potential problem gambler should be reported as soon as practicable. Reports may be submitted via phone or email to a supervisor or Compliance Officer or in writing to P.O. Box 90, Jamaica New York 11417.

Employees should first discuss their concern with their supervisor unless they believe it will not be fairly considered, the supervisor is involved, or they feel uncomfortable doing so. In such cases, employees may report directly to a Compliance Officer. If a Compliance Officer is the subject of the report or the employee is uncomfortable reporting to that person, the matter may be reported to:

Tatiana Torres  
Senior Vice President, Chief Human Resources Officer  
[ttorres@nyrainc.com](mailto:ttorres@nyrainc.com)  
718-659-2228



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### **Confidentiality/Retaliation Protection**

Reports on potential Problem Gambling will be kept confidential to the extent possible. NYRA will take steps to protect the identity of the reporter and the reportee except as legally required. Employees who report in good faith are protected from retaliation and any retaliatory acts are subject to disciplinary action.

### **Investigation of Problem Gambler Reports**

Supervisors must promptly forward any report to a Compliance Officer in writing, who will acknowledge receipt. The Compliance Officer will conduct or oversee a prompt, discreet, and objective investigation and may engage subject-matter experts or delegate tasks as needed.

To resolve an investigation, a Compliance Officer may:

- Recommend corrective action, including account closure or facility exclusion;
- Oversee implementation and monitor for recurrence.
- Follow up with reporting employee for closure where possible.

### **Self-Exclusion**

Customers may request exclusion for 1, 3, 5 years, or a lifetime. If a customer requests exclusion, NYRA will lock the customer's account, remove the customer from marketing lists, and take reasonable measures to restrict access to wagering activities at NYRA facilities, as applicable, including denial of wagering services. NYRA may not reinstate such account or include the customer on marketing list until the exclusion period expires.

NYRA maintains a process that supports Responsible Gaming and complies with applicable state regulations and their specific Self-Exclusion requirements. NYRA ensures all customers undergo steps for self-excluding as outlined below:

- A request to be self-excluded is made by contacting the NYRA Customer Service Team, via NYRA website, and NYRA Bets iOS and Android app and completing the Self-Exclusion form available. Customers are required to choose an exclusion term when submitting their request. Guidance for Self-Exclusion in Responsible Gaming is available on both the NYRA and NYRA Bets websites.
- Upon completion and submission of a Self-Exclusion form, customers are entered into NYRA's confidential Self-Exclusion database or NYRA Bets' jurisdictional database, depending on the state of residence. Accounts are locked, and self-excluded customers are prevented from reopening their accounts or opening new accounts during their selected exclusion period.



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- Within twenty-four (24) hours of a customer submitting their Self-Exclusion form, self-excluded customers' accounts are deactivated and are simultaneously removed from all promotional mailing lists. Within the same period, NYRA sends an email confirming account deactivation, and within seven (7) days of such account deactivation NYRA sends a check remitting any funds remaining on the account to the address of record.

Customers are allowed to submit a request to the NYRA Customer Service Team to have their name removed from NYRA's Self-Exclusion list after their original term of Self-Exclusion has expired. Customers are required to submit valid photo identification with their submission of a request for reinstatement.

### **Periodic Reviews/Modifications**

The policy is reviewed annually by NYRA Legal Department and updated as needed for regulatory compliance. NYRA reserves the right to interpret, modify, or delete this Policy at any time with or without notice. No oral or written statement by employees may alter it. Questions should be directed to a Compliance Officer.

### **Records Retention**

Records related to problem gambler investigations shall be maintained for a minimum of five (5) years from the date of creation or conclusion of an application exclusion period, or longer if required by applicable law or regulation. All records are privileged, confidential and not subject to deletion where prohibited.

### **Resources**

- New York HOPEline: 1-877-8-HOPENY.
- NYC Well: 1-888-NYC-WELL or text "WELL" to 6517
- National Suicide & Crisis Lifeline: 988

### **Additional Resources**

- **National Council on Problem Gambling**
  - Call: 1-800-GAMBLER (426-2537)
  - Chat: 1800gamblerchat.org
  - Text: 800GAM
- **Florida – Florida Council on Compulsive Gambling**
  - Tel: 888-236-4848
  - Email: fccg@gamblinghelp.org
  - Helpline: 888-ADMIT-IT (236-4848)



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- Text: 888-ADMIT-IT (236-4848)
- Live Chat: [www.gamblinghelp.org](http://www.gamblinghelp.org)
- **Indiana – Indiana Council on Problem Gambling**
  - Tel: 317-632-1364
  - Website: [www.indianaproblemgambling.org](http://www.indianaproblemgambling.org)
  - Helpline: 800-994-8448 or 866-699-4274
- **Iowa – Iowa Gaming Association**
  - Website: [iowagaming.org](http://iowagaming.org)
  - Helpline: 1-800-BETS-OFF
- **Kentucky – Kentucky Council on Problem Gambling**
  - Tel: 502-223-1823
  - Website: [www.kycpg.org](http://www.kycpg.org) and [www.kygamblinghelp.org](http://www.kygamblinghelp.org)
  - Helpline: 1-800-GAMBLER
- **Louisiana – Louisiana Association on Compulsive Gambling**
  - Tel: 318-227-0883
  - Email: [lacg@helpforgambling.org](mailto:lacg@helpforgambling.org)
  - Website: [www.helpforgambling.org](http://www.helpforgambling.org)
  - Helpline: 877-770-7867
- **Maine – Maine Council on Problem Gambling, Inc.**
  - Tel: 207-520-0293
  - Email: [info@maineproblemgambling.org](mailto:info@maineproblemgambling.org)
  - Website: [www.maineproblemgambling.org](http://www.maineproblemgambling.org)
- **Maryland – Maryland Council on Problem Gambling**
  - Tel: 443-292-2809
  - Email: [MarylandCouncilPG@yahoo.com](mailto:MarylandCouncilPG@yahoo.com)
  - Website: [marylandproblemgambling.org](http://marylandproblemgambling.org)
  - Helpline: 1-800-522-4700
- **New Hampshire – NH Council on Problem Gambling**
  - Website: [info@nhproblemgambling.org](mailto:info@nhproblemgambling.org)
  - Helpline: 1-603-724-1605
- **Ohio – The Problem Gambling Network of Ohio**
  - Tel: 614-750-9899
  - Email: [info@pgnosio.org](mailto:info@pgnosio.org)
  - Website: <http://www.pgnosio.org>
- **Pennsylvania – Council on Compulsive Gambling of Pennsylvania, Inc.**
  - Tel: 215-643-4542
  - Email: [josh@pacouncil.com](mailto:josh@pacouncil.com)



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- Website: [www.pacouncil.com](http://www.pacouncil.com)
- Helpline: 1-800-GAMBLER
- **Virginia – Virginia Council on Problem Gambling**
  - Tel: 804-827-0921
  - Email: [info@vcpg.net](mailto:info@vcpg.net)
  - Website: [vcpg.net](http://vcpg.net)
  - Helpline: 1-800-522-4700

## Violation

Failure to comply with this policy may result in:

- Disciplinary action up to and including termination (for employees).
- Denial of services or exclusion (for customers).
- Regulatory reporting as required by law.

## Miscellaneous

### Research

NYRA will continue to participate in research efforts to improve understanding of how its products and services impact employees and customers. Efforts may include surveys, training analyses and data-based insights from NYRA tracks and NYRA Bets platforms.

### Complete Policy

This Policy cannot, and is not intended to, address every situation that may arise. Each individual is responsible for acting lawfully and ethically, for reporting unlawful or unethical conduct, and for seeking guidance when in doubt.

### Policy Distribution

This Policy shall be distributed to all NYRA employees.

### Policy Location

This Policy shall be maintained in NYRA's Code of Ethics and Business Conduct and made available to employees and on NYRA's website.