

# PPA Tour Sports Betting & Integrity Policy

#### 1. INTRODUCTION

#### a. **BACKGROUND**

- i. The Professional Pickleball Association (PPA) Tour is strongly committed to maintaining the integrity of the PPA Tour, its events, players, coaches, and other PPA Tour personnel. Gambling, particularly on PPA Tour events or other sports presents potential risks to the integrity of our competition and can negatively impact the association and its stakeholders. We, therefore, owe it to our fans and everyone associated with the PPA Tour to take all appropriate steps to safeguard our sport against possible threats from legal gambling as well as gambling in a legal, regulated context.
- ii. This document sets out the guiding principles and provides general advice to all pickleball participants and officials on the issues surrounding the integrity of pickleball and betting. These guidelines are to be read with the Professional Pickleball Association Tournament Rulebook. These guidelines will be reviewed regularly by the PPA Tour to ensure they maintain their relevance.

#### b. **DEFINITIONS**

- i. "Covered Persons" This PPA Tour Sports Betting & Integrity Policy applies to the following persons:
  - 1. All athletes, professional and amateur, who compete in PPA Tour events.
  - 2. All coaches, trainers, or referees who may have access to privileged information.
  - 3. Each employee of the PPA Tour.
  - 4. Each independent contractor of the PPA Tour who has the potential or perceived influence over or privileged knowledge related to PPA Tour events.
  - 5. Executive members of Dundon Capital who have the potential or perceived influence over or privileged knowledge related to PPA Tour events.
- ii. "Sports Betting" Sports betting, gambling, and wagering are defined as staking, risking, or receiving anything of value, financial or otherwise, in connection with a sporting event of any kind, regardless of the location in which the sporting event takes place or in which the wager is placed. This definition encompasses a wide range of activities including, but not limited to, those available in any gaming facility, casino, lottery facility, racetrack facility, or on the internet or electronically (i.e., mobile sports betting).
- iii. "PPA Tour Events" All tournaments, matches, or other events organized or promoted by the PPA Tour.
- iv. "Pickleball" A game between two to four players in which players use paddles to hit a plastic ball over a net. For clarity, this does not include tennis, table tennis, or paddleball.
- v. "Inside Information" Any information relating to a match or competition that an individual possesses by virtue of their position within the sport and

that is not in the public domain or readily accessible by the public. Inside Information may include certain information regarding the competitors in a match or competition, the conditions, tactical considerations or any other aspect of a match or competition.

#### c. POLICY SCOPE

i. This PPA Tour Sports Betting & Integrity Policy strictly applies to all Covered Persons defined in this document, although the PPA Tour expects all individuals associated with PPA Tour events to understand and abide by the standards of conduct outlined in this policy.

# 2. STANDARDS OF CONDUCT

a. All Covered Persons are expected to know the rules and regulations laid out in this document. Failing to abide by the rules and regulations laid out in this document will result in punishment by the PPA Tour. While participating in non-PPA Tour events, Covered Persons are expected to adhere to the guidelines and standards of conduct related to the governing body running such event. If you have any questions regarding this policy, please reach out to PPA Integrity Info via email at integrityinfo@ppatour.com. The PPA Tour expects all its athletes, employees, and other stakeholders to adhere to the highest level of integrity no matter the event.

### b. ILLEGAL BETTING

i. Covered Persons may not engage or attempt to engage – nor instruct, ask, permit, cause, or enable other individuals or entities to engage or attempt to engage – in any form of illegal Sports Betting Activity in relation to any sport or event. Such activity includes but is not limited to, placing bets with illegal or unlicensed bookmakers (including, but not limited to, placing bets themselves and/or placing bets on behalf of or through a third party), operating an illegal or unlicensed bookmaker, or facilitating illegal or unlicensed bookmaking activity. Furthermore, Covered Persons may not engage in any illegal gambling activity that is unrelated to sports as this may jeopardize the integrity and standards of the PPA Tour. Covered Persons should be aware of and understand the sports betting laws and regulations in any jurisdictions in which they reside, compete, or travel.

# c. BETTING ON PICKLEBALL EVENTS

i. While participating as part of the PPA Tour, Covered Persons may not engage, nor attempt to engage in any legal or illegal Sports Betting Activity related in any way to other Pickleball competitions. This includes the PPA Tour, Major League Pickleball, the Association of Pickleball Professionals, and any other events sanctioned by USA Pickleball.

- ii. Covered Persons may not instruct, ask, permit, cause, or enable other individuals or entities to engage, nor attempt to engage, in any form of betting on Pickleball competitions.
- iii. For clarity, this standard of conduct includes not only Sports Betting Activity pertaining to Pickleball Competition outcomes but also any other proposition bets in which individuals may wager on particular aspects or details associated with a Pickleball Competition.
- iv. This standard of conduct also includes Sports Betting Activity relating to multisport bets (often known as parlays) that combine Pickleball Competitions with other non-Pickleball Competitions.
- v. It will be deemed a violation of this Policy irrespective of whether the Covered Person receives or stands to benefit directly or indirectly from such a bet. Additionally, the outcome and nature of the bet do not determine whether or not the Covered Person violated the Policy.

#### d. BETTING ON NON-PICKLEBALL EVENTS

i. Covered Persons may engage in legal Sports Betting Activity related to other sports that have no connection to Pickleball Competitions. Covered Persons may also engage in legal betting activity unrelated to sports (i.e., casino games, card games, etc.)

#### e. **INSIDE INFORMATION**

- i. Given Covered Persons position with the PPA Tour, they may have access to non-public information (i.e., injuries, coaching strategy, etc.). This information is considered sensitive information and can be used for the purposes of betting. Covered Persons may not request or disclose, directly or indirectly, any non-public information that could potentially provide an advantage in Sports Betting Activity related to Pickleball Competitions to any person that does not have a legitimate need to know such non-public information.
- ii. The use of any non-public information for the purpose of betting, or sharing it with another individual whether or not it is used for betting, is strictly prohibited under the PPA Tour Sports Betting & Integrity Policy.
- iii. Covered Persons are expected to reasonably know and understand what information is considered to be non-public information and shall not disclose it via any official or non-official media channel, which includes social media.

#### f. EVENT MANIPULATION

i. Covered Persons must play fair, act with integrity, and never manipulate the outcome or any individual aspect of a Pickleball Competition. Furthermore, Covered Persons may not influence nor attempt to influence any Pickleball event in any such way that the outcome or any other aspect is determined by anything other than the competitors' merits. This includes but is not limited to, deliberately losing, deliberately underperforming, manipulating the number of points scored, the misapplication of rules, and interfering with any playing surface or equipment.

ii. This standard of conduct also includes commenting on betting odds regardless of whether or not the individual participated in the competition on which they are commenting. Covered Persons should refrain from referencing betting odds relating to Pickleball events as this may cause there to be a perception that the results are manipulated for betting purposes. Covered Persons will be in violation of this standard of conduct even if their attempts to influence or manipulate are unsuccessful.

#### g. BRIBERY & GIFTS

i. Covered Persons may not be involved, directly or indirectly, with the offering, giving, acceptance, or receipt of a bribe, gift, or any type of consideration, financial or otherwise, that could directly or indirectly result in the improper influencing or manipulation of any PPA Tour Competition or any other Pickleball Competition in any way. This includes the solicitation or acceptance of any benefit that results in the potential manipulation of the outcome of any aspect of a Pickleball Competition. Covered Persons may be in violation of this standard of conduct even if they do not influence or manipulate any PPA Tour Competition or any other Pickleball Competition.

#### h. SPORTS BETTING ENDORSEMENTS & SERVICES

i. Covered Persons, when acting in a personal capacity, must not advertise, promote, or provide services or endorsements to any third party that is related in any way to Sports Betting Activity unless authorized in writing by the PPA Tour. Covered Persons are also prohibited from advertising, promoting, or discussing any betting activity publicly in which they participate.

# i. OBLIGATION TO REPORT

- i. Covered Persons are obligated to report suspected, anticipated, or known violations of this policy, without undue delay and unprompted at first available opportunity, by email at integrityinfo@ppatour.com or via the PPA online reporting website at PPATour.com/reporting.
- ii. Covered Persons must report such information whether or not they are directly involved with the matter or should have reasonably been aware of the matter.
- iii. Covered Persons must not retaliate against any individual who, in good faith, reports a matter in accordance with this Policy.
- iv. Failure to report any potential or known violations of this Policy will be deemed a violation of the PPA Tour Sports Betting & Integrity Policy. If individuals have any questions pertaining to reporting, they should email their questions or concerns to integrityinfo@ppatour.com.

# j. OBLIGATION TO COOPERATE

- i. Covered Persons are required to cooperate and affirmatively participate in any internal or external investigation of a suspected violation of this policy. Failure to cooperate with an investigation will be deemed a violation of the policy. This includes attending any interview with the PPA Tour, or any person appointed by the PPA Tour, which they are directed to attend and to fully and truthfully answer all questions asked of them in the interview other than a question where the answer would render the Covered Person liable to prosecution for an indictable offense.
- ii. Covered Persons must also cooperate by the following actions:
  - 1. Producing documents and records related to any matter that is the subject of an investigation being conducted pursuant to this Betting Policy (including telephone records and internet service records);
  - Providing their mobile phone(s), other personal electronic device(s) and computer(s), as well as access to any cloud-based storage used in association with those devices so that it may be images and examined by forensic experts to assist with an investigation being conducted pursuant to this policy;
  - Providing any login credentials necessary to access any device or system on which data are stored, including on any social media platform.

# 3. **DISCIPLINARY ACTION**

# a. INTERPRETATION & ENFORCEMENT

i. The PPA Tour reserves the sole right to interpret and enforce the standards of conduct outlined in this policy. Specifically, the Commissioner shall maintain the sole responsibility and authority to issue disciplinary decisions relating to violations of this policy.

# b. SANCTIONS

- i. Covered Persons whom the PPA Tour determines to be in violation of this policy will be subject to discipline, which shall vary based on the nature of the violation. Examples of such disciplinary action include, but are not limited to, fines, termination of employment, and temporary or permanent bans from ongoing or future PPA Tour Competitions. In appropriate cases, the PPA Tour reserves the right to refer violations of this policy to law enforcement. The PPA Tour also may share information with other relevant authorities, including Pickleball Administrators, bookmakers, and other Betting Organizations where the PPA Tour considers it reasonably necessary to disclose such information for such third parties to carry out their respective functions.
  - 1. The PPA Tour reserves the right to consider a wide range of mitigating or aggravating factors when determining appropriate disciplinary action in any particular case. Examples of

such factors include, but are not limited to, timely or untimely admissions of guilt, involvement of blackmail or coercion, cooperation with investigations, isolated or repeated violations, and participation in training or education modules.

#### c. EVIDENTIARY STANDARDS

i. The PPA Tour must satisfactorily demonstrate that there has been a violation of this policy prior to imposing disciplinary action for such violations. The severity of the alleged violation shall be used to determine the appropriate standard of proof. The PPA Tour reserves the right to review and assess all types and forms of evidence and will issue a written and reasoned decision following its assessment of the evidence.

# d. APPEAL AND REINSTATEMENT

- i. Written disciplinary decisions will outline, as applicable, conditions of appeal and reinstatement. Examples of such conditions may include but are not limited to, attendance at educational or counseling sessions, payment of fines, or cooperation with investigations.
  - 1. A Covered Person may appeal a disciplinary decision related to any misconduct set forth in this policy. If an individual wishes to file an appeal, he or she shall make a written request addressed to the PPA Tour.
  - 2. The PPA Tour reserves the right to assess whether all terms and conditions have been met prior to reinstatement.

#### e. MUTUAL RECOGNITION

i. The PPA Tour may, without conducting its own proceedings, recognize and give effect to integrity-related decisions and sanctions pertaining to current or prospective Covered Persons by other Pickleball organizations, including any suspensions or permanent ban by another Pickleball organization. Without limitation, PPA Tour may deny entry to a PPA Tour event to any athlete, trainer, coach, employee, or team member who is subject to an integrity-related investigation or disciplinary proceedings of another Pickleball organization.