



GAMBLING POLICY for NFL Personnel 2022

The NFL is strongly committed to maintaining the integrity of its brand, games, clubs, players, coaches, and other League and club personnel. Gambling, particularly betting on NFL games or other sports, presents risks to the integrity of our competition and team cohesion, and can undermine the confidence and trust of our fans and colleagues in America’s greatest game. We therefore owe it to our fans, and everyone associated with the 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.

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

1. DEFINITIONS

For purposes of this Policy, the following definitions shall apply:

Gambling – the wagering of money or other things of value, on an event with an uncertain outcome with the intent of winning additional money or thing(s) of value. It involves 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; and
- **Consideration** – In order to receive a chance to win the prize, the participants provide or risk something of value.

It 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.”

Examples of activities that constitute gambling include betting on sporting events or other athletic competitions, including placing wagers at sportsbooks and similar establishments; betting on card, dice or video games (including poker, in any of its variations, and e-sports

games or tournaments); playing casino games (e.g., slot machines, blackjack, keno, roulette, craps); betting on animal racing; or participating in “sports pools,” including pay-to-play squares contests.

Certain activities generally are not considered to be gambling, and participating in them is permissible, subject to conditions:

(i) League, club, or partner-sponsored skills competitions (e.g., racquetball tournaments, “Club Olympics” events) for prizes, provided that there is no wagering on the outcome;

(ii) “casino nights” or similar events for charity, provided that no money or items of value are wagered and all proceeds from the event are donated to a legally recognized charity;

(iii) 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), subject to the limitations set forth in Section 7 of this Policy; and

(iv) free-to-play games or contests that involve predicting elements of live sporting events, provided that: (a) the game or contest is not considered gambling under applicable law; (b) NFL Personnel are eligible to participate under the applicable game/contest rules; and (c) no NFL Personnel may accept prizes valued in excess of Two Hundred Fifty Dollars (\$250) in the aggregate over the course of a season in any such game or contest, if based on NFL games or events.

Gambling Entity – A casino, sportsbook, or other establishment or business that offers commercial gambling.

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

Sports Betting – Gambling, by any system or method, on any real-world professional or amateur sporting (or related) event or any portions or aspects of the event, including the score, statistics or outcomes of any such events, or the performance of any individual participant(s). Sports Betting includes, without limitation, straight bets, teasers, parlays, totals (or “over-unders”), moneylines, betting pools (e.g., “survivor” or “square” pools), in-game wagering (whether on final or interim game scores, statistics, discrete in-game events or otherwise), exchange wagering, and proposition bets.

Sports Betting Operations – (a) directly engaging in or participating in Sports Betting and/or (b) engaging in business operations directed towards sportsbooks or sports bettors (e.g., “tout” services or providing business-to-business services to sportsbooks, such as setting lines or providing data/technology to be used for purposes of offering or engaging in sports betting).

2. GAMBLING ACTIVITIES

No Illegal Gambling

NFL Personnel are strictly prohibited from participating in or facilitating any form of illegal gambling, whether on sports or otherwise. Sports betting remains illegal in many states, and in states where it is legal in brick-and-mortar establishments, mobile and/or on-line betting may not be legal.

Permissible and Restricted Gambling Activities

NFL Personnel are subject to the following rules concerning gambling activities, regardless of whether the activities are legal:

1. *Betting on Football:* All NFL Personnel are prohibited from placing, soliciting, or facilitating any bet, whether directly or through a third party, on any NFL game, practice or other event (e.g., Draft or Combine). This includes betting on game outcome, statistics, score, performance of any individual participant, “futures”, or any other kind of “proposition bet” in any way related to the NFL (regardless of whether such bet involves actual on-field play) (e.g., prop bets related to Gatorade color, pre- or post-game events, halftime show, off-field player conduct or outcomes, etc.)
2. *Betting on Other Sports:* All NFL Personnel other than Players are further 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 amateur (e.g., Olympic, AAU) sports competition, tournament or event.
3. *Game Fixing:* NFL Personnel shall not throw or fix any NFL game, 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 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, whether directly or indirectly, from using, disclosing or providing access to confidential, non-public information regarding any NFL game or event, including but not limited to: (a) a participant’s availability for or performance in an NFL game or event; or (b) personnel-related decisions regarding an official, player, coach, team manager, or League or Club executive, including team rosters and game working assignments. NFL Personnel must report any known request for, disclosure of, or possible disclosure of such information.
6. *Sportsbooks:* NFL Personnel shall not enter, visit, or use a sportsbook at any time during the NFL playing season. This is not intended to prohibit simply passing through a sportsbook to access a permissible area of a casino or hotel complex.

7. *Gambling in the Workplace or While Working*: NFL Personnel shall not engage in any form of Gambling in any club or League facility or venue (e.g., practice facility, stadium, team hotel, Draft or other League or club event); on any League or club charter or other transport; while traveling on club or League business; or while making an endorsement or promotional appearance. For clarity, playing cards or other casino-type games is permitted as long as nothing of value is wagered.
8. *Gambling on Personal Time*: NFL Personnel (excluding NFL Officials, otherwise subject to the NFL-NFLRA Collective Bargaining Agreement) may participate in legal non-sports gambling on personal time (when not traveling on club or League business), including during the season.

3. ENDORSEMENTS AND PROMOTIONS

NFL Personnel are prohibited from engaging in, using or permitting the use of one's name or images in connection with activities or materials that depict, advertise, market or promote any form of gambling (including, but not limited to, Sports Betting) or any Gambling Entity, subject solely to the following exception as determined in advance by the League Office. NFL Personnel (excluding NFL Officials and Officiating Staff) may make promotional appearances at or on behalf of a Gambling Entity, including at events sponsored by such an entity, and use or allow others to use their names and images in marketing and promotional materials related to the appearance, provided: (i) the appearance and all related materials do not involve, depict or promote any gambling (including, but not limited to, Sports Betting); (ii) the appearance does not take place in a physical location whose primary purpose is to offer Sports Betting (or that is otherwise promoted as a "sportsbook"); (iii) the appearance and/or marketing and promotional materials are solely and specifically promoting a legitimate *non-gambling* line of business (e.g., hospitality, fantasy sports games, free-to-play games); and (iv) if the appearance takes place on premises that offer Sports Betting, the appearance must not be in connection with an NFL "watch party." Appearances in advertisements for a Gambling Entity may similarly be permitted where the advertisements promote only established, non-gambling lines of business offered by the Gambling Entity (e.g., fantasy sports games, free-to-play games), and no gambling is involved or depicted. Any such appearance or promotion must be approved in advance by the League Office.

League Talent appearances on League owned-and-operated properties in programming and similar content related to Sports Betting are subject to separate guidelines and League Office pre-approval.

4. EMPLOYMENT AND OWNERSHIP INTERESTS

NFL Personnel may not work for, or operate, in whole or in part, directly or indirectly, a Gambling Entity. Unless otherwise authorized, NFL Personnel may not own any part of a Gambling Entity that generates revenue from Sports Betting Operations unless:

- (a) Such ownership is solely through mutual fund accounts not designated as self-directed, or other passive diversified accounts; or

(b) The company is publicly traded, provided: (i) the ownership stake is a *de minimis* percentage of the company's shares outstanding, (ii) the company's primary business is something other than Sports Betting Operations, and (iii) such NFL Personnel has no role with the company and no access to the company's non-public information. NFL Personnel must seek guidance from the League Office before making an investment pursuant to this exception (b) (and may be required to demonstrate that this exception applies), and promptly divest such ownership should this exception (b) no longer apply.

5. GIFTS AND SERVICES

NFL Personnel may not accept a complimentary room, service, or other gift from a Gambling Entity if its value exceeds Two Hundred Fifty Dollars (\$250). Any items accepted (other than *de minimis* food & beverages generally offered to all patrons) must be appropriately documented and verifiable upon request. Soliciting gifts of any value is never permissible.

6. ASSOCIATIONS

NFL Personnel shall not maintain social, business and/or personal relationships with persons generally known to be professional or problem sports gamblers, in a manner that discredits the reputation of the NFL, NFL Players or the game.

7. FANTASY FOOTBALL

NFL Personnel may not: (a) accept prizes with a value in excess of Two Hundred Fifty Dollars (\$250) in any season-long fantasy football game; (b) participate in any "daily" or other similar short duration fantasy football game that offers a prize; or (c) participate in any fantasy football game (including daily, season-long, or other format) if 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.

8. RELATED POLICIES

Clubs and other NFL-related entities subject to this Policy may implement additional or supplemental gambling-related policies, with the understanding that this Policy establishes minimum standards which may not be modified without the approval of the Commissioner. In the event of any conflict or inconsistency between this Policy and a less restrictive provision of an additional or supplemental club policy, the provisions of this Policy shall govern.

9. REPORTING OBLIGATIONS

Gambling Debt: Any NFL Personnel who incurs gambling debt greater than \$10,000 to any person or gambling-related enterprise shall promptly notify the NFL Security Department at (800) NFL-1099.

Policy Violations: 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