

FanDuel Employee DFS Information and Playing Policy

This policy details some of the issues related to FanDuel employees playing in Daily Fantasy Sports (DFS) contests on our competitors' websites, issues related to information available to our employees, and our policies related to those issues. Please read this document thoroughly, and sign to indicate that you understand and agree to the policies.

Goals: These outline what we're hoping to accomplish by asking you (and other employees) to agree to this policy.

- Limit ability of employees to exploit "inside information" such as the picks of top users, or the win rates of potential opponents.
- Reassure any concerned site users that employees aren't exploiting inside info.
- Reduce chance of users questioning ability of employees to exploit inside info against them when they play on other sites.

Principles: These are some of the factors that played into the specific set of rules that we're asking you to agree to.

- Playing on other sites helps employees do their jobs better
- 'Do no harm' through play on other sites, so users are less likely to be suspicious or angry.
- Minimize internal flow of exploitable information where possible, so that there are fewer opportunities for exploitation.
- We hire people we trust, so we don't have any scandals.
- This document should provide clarity to employees on what is and isn't acceptable.

Risks: These are some of the things that could go wrong if we didn't have a policy or if the policy wasn't followed.

- Employees copying user's picks. Although this is the one that users sometimes ask about, it isn't much of a risk because the salary structures on each site are completely different. In addition, there are differences in

scoring and roster configurations. At best, employees might get an idea of a player to research from a top user's lineups...but that kind of information is available lots of places.

-Employees targeting weak users as opponents on other sites. This seems to concern users less, but is more of a real threat. In fact, in a sense, it is happening already. Information that is known can't be unknown, so it's important that we put some controls in place to limit it.

-Leakage of personal information (including win rate) of users outside of company.

Internal Controls & Guidelines: These are rules about how you will treat confidential information.

-Only discuss our users' success and lineups where necessary. The less awareness of this information internally, the less chances for exploitation.

-There is an expectation that employees will only look up info such as user lineups or user win rates where needed to do job.

Rules for Employee Play on Other Sites:

-Never be among the top five players by volume on any one site (based on site leaderboards). Never be among the top ten overall on the RotoGrinders leaderboard. Top players frequently become targets for accusations by other users.

-Never account for more than 2% of entries in any tournament of more than 1,000 entries. Never account for more than 5% of entries in any tournament of more than 100 entries. Players who swamp big tournaments with entries frequently become targets of accusations.

-Don't be the 2nd person into a head to head contest against the same opponent in more than one contest per day. This rule will greatly limit the ability to exploit information about user performance, and will also limit the likelihood of complaints from users.

-Never use information gained from viewing users' lineups.

-Seek to avoid playing anyone whose lineups you saw for that time period.

-You must provide FanDuel with a list of your usernames on all sites where you play for real money. We may or may not choose to reveal your employment status and identity to those sites or on other industry sites.

Additional Rules:

-Do not play in real money contests on FanDuel for 12 months after termination of employment with FanDuel, regardless of reason for termination.

I understand and agree to abide by the rules set out in this document.

Printed Name_____

Electronic signature or initials_____

Date_____

Below are the sites on which I play Daily Fantasy Sports for real money, and my user names on those sites.

<u>Site</u>	<u>User name</u>
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