

# OPERATIONAL MANUAL RIOPLAY

(Customer Service Procedures)

**CONFIRMED**

Willemstad, on November 29, 2025

A handwritten signature in black ink is written over a circular stamp. The stamp contains the text "MORGANITE CORPORATE SERVICES B.V." and "CURAÇAO" around a central logo.

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**Statutory Director**  
*of Morganite Corporate Services B.V.,  
acting on behalf of BAMLA LIMITED N.V.*

**Represented by:**  
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Document Control

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## 1. General Overview

The Rioplay Operational Manual outlines the daily operational procedures and internal workflows for the **Customer Support Department** under the **Curaçao gaming license**.

The document serves as both an internal reference and an official operational overview requested by the licensing authority.

This manual describes the processes related to customer communication, verification, payments, bonuses, and responsible gambling. It ensures that all Rioplay operations are consistent, transparent, and compliant with Curaçao regulatory standards.

### Objectives:

- To standardize customer support procedures across all teams (Latvia and Brazil).
- To ensure consistency and compliance in customer interactions.
- To define escalation flows between departments.
- To serve as an internal training and quality assurance reference.

### Scope:

This document applies to all Customer Support staff handling Rioplay operations - including chat, email, and ticket-based communication, as well as Security, Payments, and Technical support functions.

## 2. Customer Support Department Structure & Responsibilities

The Rioplay Customer Support Department operates 24/7 across two teams - one in-house and one outsourced. The department ensures timely, professional, and compliant communication with all customers.

### Responsibilities Breakdown

| Role                                          | Core Responsibilities                                                                                             |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| <b>Head of Support (HOS)</b>                  | Oversees operational quality, approves procedures, coordinates cross-departmental workflows.                      |
| <b>Support Quality Assurance Manager (QA)</b> | Evaluates support quality, reviews chats and tickets, and ensures adherence to internal standards.                |
| <b>Team Leads (TLs)</b>                       | Monitor agents' performance, manage escalations, handle critical cases (multiaccounts, complaints).               |
| <b>Support Agents</b>                         | Provide customer assistance via chat and tickets, handle general inquiries, follow escalation protocols.          |
| <b>Security Team</b>                          | Conducts KYC, SOF, and fraud checks. Handles sensitive requests (account closure, document change).               |
| <b>Payments Team</b>                          | Verifies payout requests, checks thresholds, ensures compliance with anti-fraud controls.                         |
| <b>Second Tier Support</b>                    | Handles technical escalations, contacts providers/platform, validates issues, and returns resolutions to Support. |

### Communication Channels

Internal communication across departments is maintained through:

- **Slack** - for real-time internal coordination and escalation (e.g., #support-fraud, #support-payments).
- **LiveAgent** - for customer-facing interactions and ticket tracking.
- **Jira** - used internally for management-level task distribution and internal reviews;
- **Confluence** - for maintaining SOPs, templates, and manuals.
- **Google Workspace (Drive, Sheets, Docs)** - for shared reports and internal data tracking.

### 3. Customer Registration and Account Management

#### 3.1. Account Creation

Customers can register on the Rioplay platform by completing the online registration form. The registration process is designed to ensure compliance with KYC principles while maintaining an intuitive user experience.

##### Registration Fields:

- Full Name
- Date of Birth (must be 18+ years old)
- Residential Address
- Country of Residence
- Email Address
- Phone Number
- Password

Upon successful registration, the system automatically creates a **Customer Account (Profile)** which allows access to deposits, withdrawals, and gameplay features.

#### 3.2. Account Verification

Verification (KYC/CPF/SOF) is **triggered once specific transactional or turnover thresholds are reached**, in accordance with internal risk and compliance procedures. The verification process is managed by the **Security Team** under Curaçao licensing requirements and company SOPs.

KYC checks are **GEO-based** and depend on the player's total turnover and withdrawal behavior. Below are the current thresholds for verification and payout checks:

##### 3.2.1. Thresholds for checks (related to GEOs, not currency)

|                   | Brazil | Mexico | Peru | Chile    | Azerbaijan | RestOfTheWorld (EU) | Info                                                                                                        |
|-------------------|--------|--------|------|----------|------------|---------------------|-------------------------------------------------------------------------------------------------------------|
| <b>KYC</b>        | 1500   | 2000   | 500  | 800,000  | 300        | Withdrawal          | Mandatory KYC check upon withdrawal.                                                                        |
| <b>Big win</b>    | 5000   | 10000  | 2500 | 3000,000 | 1000       | 500 EUR / USD       | To payout (this sum or more), CS needs approval (BIG WIN CHECK) from the Technical department OR TL or HOS. |
| <b>Big payout</b> | 10000  | 20000  | 5000 | 6000,000 | 2000       | 500 EUR / USD       | To payout (this sum or more), CS needs approval from the Payment Department, TL or HOS.                     |

*\*All threshold values are indicated in the local currency of the corresponding GEO. No currency conversion is used.*

*\*As long as customers' withdrawals do not reach the thresholds for KYC check during their lifetime, verification is not required (unless triggered for other reasons, e.g., multi-account investigation or suspicious activity).*

Additionally, **Big Win** and **Big Payout** approvals require manual review by designated departments:

- **Big Win Check:** Approval required from Technical Team before payout.
- **Big Payout Check:** Approval required from Payments Team before payout.

### 3.3. Account Information Management

Customers may request updates to their personal data (such as phone number or address) by sending a formal email to the **Security Team** and attaching a valid identity document & Proof of Address (POA).

Email change requests cannot be processed - if a customer registers with an incorrect email, they must create a new account, and the previous one will be permanently closed by the **Security Team**.

All approved changes are documented by Security and reflected in the Back Office. Support agents handle such cases via LiveAgent and escalate eligible requests to the Security Team email channel for verification.

*\*The Security Team communicates with customers exclusively via email (no chat support available).*

### 3.4. Account Security

Rioplay ensures the protection of customer data and account integrity through encrypted systems, restricted staff access, and strict internal security protocols.

All employee accounts with access to the Back Office and customer data are secured by Two-Factor Authentication (2FA) to prevent unauthorized access.

Customer accounts may be closed, reactivated, or self-excluded upon request or under Responsible Gambling (RG) policies. These processes are managed jointly by Customer Support and Security Team, ensuring full compliance with responsible gaming and data protection regulations.

Rioplay regularly reviews internal access levels, password policies, and data protection standards to maintain system integrity and safeguard player information.

### 3.5 Email and Phone Verification

Before requesting a withdrawal, customers must verify both their **email address** and **phone number**.

- **Email Verification:** A confirmation link is sent to the registered email. The customer must click the link to activate and confirm the email address.
- **Phone Verification:** A verification code is sent via SMS to the phone number provided in the profile. The customer must enter the code on the website to complete verification.

**Withdrawals cannot be processed unless both email and phone number are verified**, even if KYC documents are not required according to GEO thresholds.

Support cannot complete email or phone verification on behalf of the customer - it must be done directly by the account holder through their profile.

## 4. Verification and Security Procedures (KYC, SOF, CPF, etc.)

### 4.1. Overview

The **Security Team** is responsible for all verification processes, document handling, and sensitive account-related procedures. These include Know Your Customer (KYC), Source of Funds (SOF) or selfie with the document per request (requested if there are suspicions regarding the account's legitimacy), and CPF verification, as well as fraud investigation, account closures, and Responsible Gambling requests.

All verification procedures are conducted in line with Curaçao licensing standards, internal Rioplay SOPs, and best industry practices for customer data protection.

### 4.2. KYC Triggers and Scope

KYC verification is **initiated based on turnover and withdrawal thresholds**, as described in Section 3.2.

Verification may also be triggered manually by the **Security Team** or **Customer Support** in the following cases:

- Suspicious activity or multiple account indicators.
- Card or payment method used for deposits.
- Big Win / Big Payout checks exceeding limits.
- Account reactivation or sensitive profile change.
- Regulatory or compliance requests.

*\*Customers are requested to complete KYC only when necessary, ensuring a frictionless experience while maintaining full compliance with Curaçao regulations.*

### 4.3. Types of Verification

#### 4.3.1 Standard KYC Requirements (applies to all GEOs unless specified)

| Verification Type              | Purpose                                        | Accepted Documents                                                                     | Notes                                                                                                                                                                               |
|--------------------------------|------------------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Proof of Identity (POI)</b> | Confirms customer identity and legal age.      | Passport, National ID, Driver's License, or <b>Brazilian RG.</b>                       | RG is accepted for Brazil as one of the valid POI options.                                                                                                                          |
| <b>Proof of Address (POA)</b>  | Confirms residential address.                  | Utility bill, bank statement, or an official document issued within the last 3 months. | Must show full name and address matching the customer profile.                                                                                                                      |
| <b>Proof of Payment (POP)</b>  | Confirms ownership of the payment method used. | Card photo (first 4 & last 4 digits visible), e-wallet screenshot, or bank statement.  | <b>Not required for Brazil</b> when PIX is used, as PIX verifies CPF via linked bank account. POP may be requested only in rare AML cases or if a different payment method is used. |

*\*Brazilian players complete only POI + POA as standard KYC when using PIX.*

*\*\*For crypto deposits, POP may not be required unless requested by Security in exceptional cases.*

#### 4.3.2 Additional Verification (case-based)

| Verification Type     | Purpose                                                       | When Requested                                                                                                         |
|-----------------------|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| Selfie with ID        | Confirms real ownership of documents.                         | Requested in cases of suspected identity mismatch, account access concerns, or irregular/suspicious activity.          |
| Source of Funds (SOF) | Confirms origin of funds for compliance purposes.             | Requested only in suspicious cases or as required for AML checks. Customers must upload via “Other Documents” section. |
| CPF (Brazil only)     | Confirms CPF ownership and matches to the registered profile. | Automatically verified via PIX deposit - no document upload required.                                                  |

#### 4.4. Verification Workflow

1. **Request** - The verification process may start in one of the following ways:
  - The customer proactively uploads documents in advance to speed up future withdrawals.
  - During a withdrawal attempt, the customer sees a notification in the Withdrawals section indicating which documents must be submitted before the payout can be processed.
  - The Security Team contacts the customer by email with a request to upload specific documents, usually in cases of suspicious activity or when additional verification is required.
2. **Submission** - The customer uploads documents directly in the system via Profile → Verification section (email submission is used only in exceptional cases).
3. **Review** - Security Team verifies document validity, consistency, and data accuracy.
4. **Status Update** - Verification result is logged in Back Office and marked as *Verified*, *Rejected*, or *Pending* with specific reason, that client can see on the front end.

5. **Communication** - Support notifies the customer via LiveAgent if additional clarification or resubmission is needed.
6. **Finalization** - Once approved, Security updates the verification status, enabling the player to proceed with transactions.

All verification-related communications are handled **only by the Security Team via email** (no chat support). Support assists by redirecting players and following up on cases.

#### 4.5. Rejection Reasons and Comments

The following are common rejection reasons and standardized internal comments used in Back Office:

| Rejection Reason           | Internal Comment Example                        |
|----------------------------|-------------------------------------------------|
| Document expired           | KYC reject – expired ID, request new document   |
| Mismatch between documents | KYC reject – name/address mismatch              |
| Poor image quality         | KYC reject – document unreadable, resubmit      |
| Partial data shown         | KYC reject – incomplete document upload         |
| Fraud suspicion            | Escalate to #support-fraud, suspend withdrawals |

#### 4.6. Data Protection and Document Handling

All documents are processed and stored securely in accordance with data protection laws and internal retention policies.

- Access to customer documents is restricted to the Security Team.
- Documents are stored in encrypted systems and deleted after the legally required retention period.

#### 4.7. Coordination Between Departments

Customer Support and Security maintain continuous communication regarding verification cases. Support agents handle initial contact, while Security executes the verification itself.

Payments Team is informed of verification status before approving withdrawals or large payouts.

*\*No withdrawals are processed before KYC approval if the customer has reached or exceeded defined thresholds.*

## 5. Fraud & Multiaccount Handling During Withdrawals

### 5.1. Overview

Rioplay monitors customer activity to detect potential multiaccounting, bonus abuse, or other fraudulent behavior.

Multiaccount checks are performed **as part of the manual withdrawal processing flow**.

- Each manual withdrawal is processed by a **Customer Support agent**.
- During this review, the agent checks KYC, bonus usage, game history, and the “**Multi accounts**” section in the Back Office.
- If a multiaccount case is detected, **only the Team Lead (TL) or Head of Support (HoS)** can make the final decision on how to proceed (payout, block, bonus removal, etc.).

Auto-withdrawals are handled according to separate procedures and are not part of this section.

### 5.2. When the Multiaccount Check is Performed

Multiaccount and fraud checks are carried out **at the moment of withdrawal processing**.

When a customer requests a manual withdrawal, the Support agent must:

1. Open the customer profile in Back Office.
2. Check:
  - KYC and verification status (email, phone).
  - Bonus status and history (active bonuses, completed wagering).
  - Game logs to understand how the win was generated (with or without bonus).
  - The “**Multi accounts**” tab - the main source of information about possible links to other accounts.

If there are no multiaccount indicators and all other checks are passed, the agent may proceed with the withdrawal according to standard withdrawal procedures.

### 5.3. Multiaccount Indicators

The Back Office may display several **multiaccount types** in the “Multi accounts” section, for example:

- IP match
- Password match
- Phone number match
- GACID / device match
- Document match
- Payment method match
- Address match
- Any **combination** of the above

The system labels each match with a specific tag inside the Multi Accounts section.

### 5.4. Easy vs Hard Multiaccount Cases

Rioplay distinguishes between **easy** and **hard** multiaccount cases.

#### 5.4.1. Easy cases (no extra action required)

- **IP match only** (e.g., shared Wi-Fi, workplace, shopping mall)
- **Password match only** (simple or common passwords)

If there are no other risk indicators, the withdrawal can be processed after standard checks.

#### 5.4.2. Hard cases (mandatory escalation)

Any multi-account match **other than IP-only or password-only** requires escalation:

- PAYMENT\_MULTIACCOUNT;
- GACID\_MULTIACCOUNT (device / browser);
- PHONE\_MULTIACCOUNT;
- DOCUMENT\_MULTIACCOUNT;
- NAMES\_MULTIACCOUNT;
- ADDRESS\_MULTIACCOUNT;
- Any **COMBINATION** (e.g., IP + password, phone + device, etc.)

Support **must** escalate these cases to **#support-fraud** for review by TL or Head of Support.

### ● 5.5. Impact on KYC Thresholds

As described in Section 3.2, some GEOs (e.g. **Brazil, Mexico, Azerbaijan**) have specific **turnover thresholds** before KYC is normally required, while **Rest of the World / EU** customers must complete full KYC before withdrawals.

In multiaccount or fraud-suspicion cases:

- **Hard multiaccount indicators override normal thresholds.**
- Even if the customer comes from a GEO where KYC is usually triggered only after reaching a certain turnover, **full KYC will be requested immediately** when a hard multiaccount case is detected.

This includes requesting:

- Proof of Identity,
- Proof of Address,
- Proof of Payment (except Brazil with PIX logic, as defined in Section 4.3),
- and/ if needed Selfie with ID and/or Source of Funds (SOF).

### 5.6. Support Actions When a Multiaccount Flag is Present

If the “Multi accounts” section shows any **hard-case** indicators, the Support agent must:

1. Review all relevant accounts linked to the customer (registration dates, bonus usage, game history, type of match).
2. Prepare a short summary of the case.
3. Escalate the case to the **#support-fraud** Slack channel.
4. Place the withdrawal **on hold** until a decision is provided by the Team Lead or Head of Support.

*\*Support agents do not take any action on multiaccount cases **before** a withdrawal request.*

### 5.7. Decisions by Team Lead / Head of Support

Based on the analysis, TL/HoS may apply one or several of the following actions:

### 5.7.1. No Violation

- Withdrawal may proceed normally.
- Bonuses remain unchanged.

### 5.7.2. Household Case (Rule 5.5.5)

- Gameplay allowed for all individuals.
- Bonuses remain available only for the earliest registered account.
- Bonuses disabled for additional household accounts.

### 5.7.3. Bonus Abuse

If the win was generated from bonuses:

- Withdrawal may be cancelled.
- Bonuses may be disabled on one or more accounts.
- Winnings may be deducted, with the **last deposit always returned** to the customer.
- Team Lead or Head of Support may instruct Support/Security to request additional verification (KYC, selfie, explanation).

### 5.7.4. Suspicious Activity (non-bonus win)

If the win was not related to bonuses but multiaccount indicators remain:

- Team Lead or Head of Support may require full KYC and/or explanation.
- Withdrawal may be cancelled until verification is completed.
- Bonuses may be disabled on all linked accounts.

After a decision is applied, the responsible agent finalizes the case in the Back Office according to internal procedures.

## 5.8. Cross-Department Collaboration

Other departments (e.g., **Sportsbook, VIP**) may identify suspicious activity, including multiaccount links or bonus abuse.

In such cases:

- The department submits the case to **#support-fraud** with supporting details.
- Team Lead or Head of Support reviews the case and provides instructions for Customer Support on:

- communication with the customer,
- necessary verification steps,
- bonus or balance adjustments (if already performed by another department).

*\*All cross-department decisions follow the same principles described in Section 4.8.*

## 6. Account Blocks & Restrictions

Account blocks in Rioplay are used to protect customers, ensure responsible gambling, and maintain compliance with Curaçao licensing standards. Blocks can be temporary or long-term, depending on the customer's request or risk indicators.

Rioplay offers three types of account blocks:

1. **Timeout (7-day Cooling-Off Period)**
2. **Block for a Specific Time Period**
3. **Gambling Problems / Self-Exclusion (6 months+)**

*\*Each block type has different rules, duration, and unblock procedures.*

### 6.1. General Principles

- All blocks are applied through the **“Blocked”** setting in the customer profile in Back Office.
- Support may apply only the types of blocks allowed for their role.
- The customer cannot access games, bonuses, deposits or withdrawals while blocked.
- Rioplay follows the Responsible Gaming framework published at:  
<https://rioplay.com/responsiblegaming>

### 6.2. Block Types Overview

| Block Type                          | Who Applies | Minimum Duration | Early Unblock        | Unblock Procedure                                    |
|-------------------------------------|-------------|------------------|----------------------|------------------------------------------------------|
| Timeout (7 days)                    | Support     | 7 days           | Not allowed          | Auto-unblocks after 7 days                           |
| Requested by Player (Specific Time) | Security    | $\geq 7$ days    | Allowed after 7 days | Player must contact Security + answer 3 RG questions |

|                                    |          |          |                        |                                                            |
|------------------------------------|----------|----------|------------------------|------------------------------------------------------------|
| Gambling issues/<br>Self-Exclusion | Security | 6 months | Not allowed<br>earlier | Player must contact<br>Security + answer 3<br>RG questions |
|------------------------------------|----------|----------|------------------------|------------------------------------------------------------|

### 6.3. Timeout (7-Day Cooling-Off Period)

A Timeout is a short, mandatory cooling-off period that temporarily restricts a player from accessing their account for **7 days**.

#### 6.3.1. When it is applied

Support applies a Timeout when:

- a player explicitly requests a short break from gambling, or
- a player expresses emotional distress, loss of control or any statements indicating they should temporarily stop gambling.

#### 6.3.2. Key rules

- Duration is fixed - **7 days**.
- Early account reopening is **not allowed**.
- The profile automatically unlocks once the 7-day period ends.
- Support applies the block using:  
**Block type → Requested by player**  
**Unblock date → +7 days**

#### 6.3.3. Customer communication

Support informs the player that their account has been closed for 7 days and that reopening earlier is not possible.

If the player wishes to block their account for a longer period, they are instructed to contact the Security Team.

### 6.4. Block for a Specific Time Period (Player Request)

This option is used when a customer asks:

“I want to block my account for 1 month / 3 months / until next year / etc.”

#### 6.4.1. Key rules

- Security Team selects:  
**Block type → Requested by player**  
**Unblock date → chosen by customer**

- Minimum duration: **7 days**
- Account unlocks automatically when the date is reached
- Early unblock is possible **only after 7 days have passed**  
Customer must contact the Security and answer 3 Responsible Gambling questions

*\*Customer must email: [security@rioplay.com](mailto:security@rioplay.com)*

#### 6.4.2. Questions required for early unblock

The customer must answer “YES” to all:

1. *I understand that gambling is a form of entertainment, not a way to make money.*
2. *I am in control of my gambling habits and do not feel compelled to gamble.*
3. *I understand the odds and risks associated with gambling.*

If all answers are “YES”, the Security Team may unblock the account.

#### 6.5. Gambling Issues Block (Long-Term Self-Exclusion)

This block is used when a player indicates gambling addiction, significant loss of control, or requests a long-term exclusion.

This aligns with the Responsible Gaming framework on <https://rioplay.com/responsiblegaming>.

##### 6.5.1. Immediate Support action

Support immediately initiates a **7-day Timeout** to ensure the player’s short-term protection. Support also informs the player that if they would like to self-exclude for a longer period, they must contact the Security Team.

##### 6.5.2. Long-term exclusion

The long-term Gambling Problems block is applied exclusively by the Security Team upon written request from the player.

##### 6.5.3. Rules

- Minimum duration: **6 months**
- Early reopening is **not permitted**
- After 6 months, the player may request reopening via Security
- The player must answer 3 **Responsible Gambling questions** to confirm they are ready to resume gambling

#### 6.5.4. Unblock procedure (after 6 months)

To request reopening, the player must contact **security@rioplay.com** and answer the Responsible Gambling questions.

If all answers indicate regained control, the Security Team may reopen the account. These are handled by Security.

#### 6.6. Block Types in Back Office

| Block Type          | Description                                     |
|---------------------|-------------------------------------------------|
| Gambling problems   | Long-term exclusion (Security only)             |
| Closed              | Permanent closure (Security only)               |
| High risk fraud     | Fraud/security case (Security only)             |
| Multiaccount        | Fraud case (Security only; linked to Section 5) |
| Forbidden country   | GEO-restricted player (Security only)           |
| Requested by player | Timeout / specific time block (Support allowed) |
| Hacked account      | Security investigation                          |
| Underage player     | Immediate permanent closure                     |

#### 6.7. Unblocking Accounts

##### 6.7.1. Automatic Unblocks

- Timeout (7 days)
- Specific Time Block (on the selected date)

##### 6.7.2. Unblock by Request (Security Team)

Customer must:

1. Email **security@rioplay.com**
2. Provide a request to unblock
3. Answer 3 Responsible Gambling questions (YES/NO)

If answers are all “YES” → account can be unblocked.

## 6.8. Responsible Gambling (Internal Operational Overview)

Rioplay follows the Responsible Gaming policy published on:

<https://rioplay.com/responsiblegaming>

### Key operational principles:

- Gambling must be entertainment, not income
- Players can at any time request:
  - Timeout (7 days)
  - Temporary self-exclusion
  - Long-term self-exclusion (6 months+)
- Support provides immediate blocking when a customer expresses distress
- Security handles long-term exclusions
- All communication is confidential
- Players expressing distress are encouraged to use external professional support (GamCare, Gambling Therapy, Gamblers Anonymous)

### Tools Rioplay makes available to players:

- 7-day cooling-off
- Self-exclusion
- Full access to gambling history
- Ability to request restrictions via Support or Security

### RG Communication Rules

- Never encourage gambling
- Never suggest chasing losses
- Always offer assistance when a customer expresses loss of control
- Always apply a ***Timeout*** if customer mentions emotional distress or harm

## 7. Deposits & Withdrawals - Operational Overview

## 7.1. Overview

Rioplay supports deposits and withdrawals via cards, e-wallets, crypto, bank transfers and local GEO-specific methods.

All payment processing follows Curaçao licensing rules and internal anti-fraud controls.

The Payments Team as part of the Support Team is responsible for payout verification and execution.

## 7.2. Deposits - General Rules

- Deposits must be made **only from a payment method owned by the customer**.
- Funds must come from **legal and authorized sources**.
- Deposits are accepted only after confirmation from the payment processor.
- Some GEOs support local methods (PIX, SPEI, eManat, Jeton, Payz, etc.).
- Cryptocurrencies may fluctuate; rates are set by the processor at time of payment.
- Minimum deposit amounts vary by GEO, payment provider and currency.

## 7.3. Deposits - GEO Overview

| Country    | Supported Payment method                                           |
|------------|--------------------------------------------------------------------|
| Brazil     | PIX, Jeton, Payz, Crypto                                           |
| Mexico     | SPEI, Webpay, Cash Vouchers, E-Wallets, Payz, Jeton, Cards, Crypto |
| Chile      | Webpay, Cash Vouchers, E-Wallets, Payz, Cards, Crypto              |
| Peru       | PENCash, Jeton                                                     |
| Azerbaijan | Visa/Mastercard, eManat, m10                                       |
| EU / ROW   | Cards, Bank Transfers, E-wallets, Apple Pay, Crypto, etc.          |

## 7.4. Withdrawals - General Rules

The customer may withdraw cleared, verified, and eligible funds if:

- All deposits are confirmed and not reversed.
- Email and phone are verified.
- KYC is completed when required (Section 4).
- No regulatory, security, RG or fraud restrictions apply.

- The payment method used for withdrawal matches the deposit method (exceptions require additional checks).  
*All withdrawals are subject to limits, threshold checks, and fraud controls.*

## 7.5. Pre-Payout Verification Checklist (Support & Payments)

| What to Check           | Notes                                                           |
|-------------------------|-----------------------------------------------------------------|
| Payment Methods         | All deposit methods must be verified (cards/e-wallets/PIX/etc.) |
| KYC Status              | Must meet GEO threshold or mandatory withdrawal KYC             |
| Turnover > 1            | Required before any payout                                      |
| Balance & Deposit Match | Funds must be available; no reversed deposits                   |
| Bonus Usage             | Check if winnings came from bonus; apply bonus rules            |
| Multiaccount Check      | Hard flags → escalate to #support-fraud                         |
| GEO Thresholds          | Big Win / Big Payout → escalate to Technical or Payments        |
| Payment Limits          | Daily limits must allow payout                                  |
| Fraud Flags             | Any irregularities → escalate                                   |
| Internal Comments       | Check customer's history and previous payout notes              |

## 7.6. Withdrawal Limits

### Universal Rioplay Rule

**1000 EUR/day** or or the equivalent amount in other currencies.

For non-EUR currencies, limits are approximate and should be double-checked against the current exchange rate.

| Currency | Daily Limit |
|----------|-------------|
| BRL      | 6000        |
| CLP      | 1,000,000   |
| MXN      | 20,000      |
| PEN      | 4,000       |
| USD      | 1,000       |
| EUR      | 1,000       |
| AZN      | 2,000       |

## 7.7. GEO Threshold Checks (KYC / Big Win / Big Payout)

### 7.7.1. Threshold Checks table

|                   | Brazil | Mexico | Peru | Chile    | Azerbaijan | RestOfTheWorld (EU) | Info                                                                                                        |
|-------------------|--------|--------|------|----------|------------|---------------------|-------------------------------------------------------------------------------------------------------------|
| <b>KYC</b>        | 1500   | 2000   | 500  | 800,000  | 300        | Withdrawal          | Mandatory KYC check upon withdrawal.                                                                        |
| <b>Big win</b>    | 5000   | 10000  | 2500 | 3000,000 | 1000       | 500 EUR / USD       | To payout (this sum or more), CS needs approval (BIG WIN CHECK) from the Technical department OR TL or HOS. |
| <b>Big payout</b> | 10000  | 20000  | 5000 | 6000,000 | 2000       | 500 EUR / USD       | To payout (this sum or more), CS needs approval from the Payment Department, TL or HOS.                     |

*\*Support escalates all Big Win to **Technical Dept***

*\*Support escalates all Big Payout to **Payments Team / TL / HoS***

## 7.8. Brazil-Specific Rules (PIX/CPF)

PIX payouts require CPF match.

Support must verify:

1. CPF in **Payment System Callback**

2. CPF in **Main Information** → **ID number**

3. CPF in **Payout Request**

- If CPF mismatch = cancel payout (“Payment system differs from deposit”).
- If mismatch between callback ↔ profile = escalate to #support-fraud (do NOT cancel).

## 7.9. Split Withdrawals

If the customer exceeds **daily** limits, but part of the requested amount can still be paid:

- Support creates a request in **#support-payment**
- Payments Team executes partial payout and returns remaining amount to balance
- Customer receives notification adjusted to their GEO limits

## 7.10. When We Cancel a Withdrawal

A withdrawal request shall be cancelled under any of the following conditions:

- Turnover < 1
- Payment method differs from deposit (unless escalated)
- Email/phone not confirmed
- Payment system mismatch (GEO-specific)
- Documents required / KYC incomplete
- Fraud or multiaccount suspicion
- Bonus abuse or unmet wagering
- Thresholds require prior checks

## 7.11. Responsibilities

- **Payments Team** - verifies payouts, applies checks, processes withdrawals
- **Security** - KYC, SOF, RG blocks, fraud investigations
- **Team Lead & Head of Support** - escalations, final approvals, critical cases
- **Technical Team** - Big Win verification

## 8. Bonuses, Promotions & VIP (Rioplay Levels)

### 8.1. Overview

Rioplay offers various bonuses, promotions, free spins, cashback programs, and a multi-level VIP system (“Rioplay Levels”).

All bonus settings, eligibility, wagering, expiration, and technical configuration are fully handled by the **Second-Tier Support** and **VIP Team**.

**Customer Support does not add, modify, remove, or manually credit any bonuses.**

Support only:

- informs customers about general bonus rules,
- checks bonus status in Back Office (*Trader's office*),
- redirects bonus-related issues to the correct Slack channels.

All bonus terms are regulated by:

- Rioplay **Bonus Rules**
- General T&C (Section 8, 9, 14),  
Sportsbook T&C (for sports bonuses),

## **8.2. Where Support Checks Bonus Information**

For each customer, bonus information is located in Back Office → **Trader's office** → **Presents / Promo / Bonus history**.

Support can review:

- Active bonuses,
- Wagering progress,
- Expiration time,
- Source of bonus (deposit, promo code, calendar, VIP),
- Free spins (activated / pending),
- Cancelled bonuses,
- Bonus risk score.

Support may **view only** & does **not** edit bonus settings or wagering values.

## **8.3. Bonus Types**

Support does not need to memorize parameters.

However, support must know what exists:

- **Welcome Pack (multiple deposits + FS)**
- **Daily Reload Bonus**
- **Crypto Bonus**
- **Sports Weekly / Sports Weekend / Freebets**
- **Payday Bonus**
- **Calendar-based spins (Wednesday Spins / Exclusive Spins / App Spins)**

- **Rioplay Levels rewards:**

- Daily Reload %
- Weekly Cashback %
- Level-Up Cashback %
- Crypto Boost

*\*All technical details (percentages, wagering, caps, expiration) are checked in Trader's office and T&C - not communicated manually.*

## **8.4. Support Responsibilities**

Support is allowed to:

1. **Explain general bonus principles**, referring to T&C.

Example topics:

- wagering requirements,
- bonus vs cash balance,
- one active bonus at a time,
- bonus cancellation upon withdrawal request,
- how free spins are activated.

2. **Check the bonus situation in Trader's office.**

3. **Communicate status updates to customers**, such as:

- bonus activated / pending / revoked,
- wagering not completed,
- bonus expired,
- free spins already used.

4. **Identify bonus-related issues and escalate.**

Support **must NOT**:

- Add or modify bonuses,
- Manually trigger free spins,
- Reset wagering,
- Extend expiration,
- Re-credit cancelled bonuses,
- Change VIP levels or cashback amounts.

## 8.5. Escalation Rules for Bonus Issues

### 8.5.1. When to Escalate

Support escalates whenever:

- Bonus did not activate correctly,
- Free spins did not appear,
- Wagering is incorrect,
- Bonus was credited to the wrong GEO,
- Customer reports a missing promotion,
- Promo code does not work,
- Sport freebet not issued,
- Cashback not received,
- Daily Reload/Level Up reward missing,
- VIP level incorrect,
- Bonus expired earlier than expected,
- Any behavior inconsistent with T&C.

### 8.5.2. Where to Escalate

All bonus-related issues must be escalated through dedicated internal Slack channels. These channels are monitored by the responsible departments, who handle configuration, technical corrections, and validation of bonus activity.

Support does **not** perform any manual adjustments and must always escalate when customer issues require technical or administrative intervention.

Escalation routing:

| Issue Type                                   | Slack Channel       | Responsible                          |
|----------------------------------------------|---------------------|--------------------------------------|
| Casino bonuses, calendar spins, welcome pack | #technical-support  | Technical Dept / Second-tier support |
| Sports bonuses / freebets                    | #sportsbook-support | Sportsbook Dept                      |
| Cashback, VIP levels, weekly/monthly rewards | #vip-support        | VIP Team                             |

Support includes:

- Customer ID,
- Description of issue,
- Screenshots from Trader's office if relevant,
- Expected behavior (from T&C).

## 8.6. Bonus Cancellation Rules

Support must know when a bonus cancels automatically:

- Customer submits a withdrawal request (T&C 2.4).
- Wagering not completed before expiration.
- Bonus balance reaches zero.
- Promo terms violated.
- Bonus revoked during a fraud/multiaccount review.

If customer asks to cancel the bonus manually:

→ Support redirects to T&C explanation and informs that **bonus cancellation is automatic only**, no manual cancellation from support.

## 8.7. Promo Codes

Promo codes are configured only by:

- Technical Team,
- Marketing,
- VIP.

Support only:

- explains generic rules,
- checks activation attempts in Trader's office, escalates if the code does not work.

## 8.8. Bonus Abuse & Compliance

Support does **not** investigate bonus abuse.

However, if the situation looks suspicious, Support must:

- check Trader's office,
- verify if bonus-related violations from T&C Section 14 apply (e.g. low-risk betting, bonus-only strategies, opposing sports bets),
- escalate to **#support-fraud**.

Support does **NOT**:

- decide guilt,
- confiscate winnings,

- disable bonuses,
- block accounts.

These actions belong to **TL/HoS, Security**, or **Sportsbook**.

## **8.9. Rioplay Levels (VIP Program)**

### **8.9.1. What Support must know**

- Levels are **fully automated**.
- Progress is based on **turnover**.
- Cashback and Reload rewards are **no-wagering**.
- Levels cannot decrease.
- Support cannot manually adjust levels or rewards.

### **8.9.2. Support Tasks**

Support may:

- explain general rules,
- confirm current level (visible in Trader's office),
- explain how cashback works,
- confirm reward dates.

Support must escalate to **#vip-loyalty** if:

- Cashback missing,
- Level not updated after required turnover,
- Crypto boost not applied,
- Reward percentage mismatch.

## **8.10. Sportsbook Bonuses**

Sports bonuses (freebets, sports wagering bonuses, sports weekend offers) have different rules from casino bonuses.

Support:

- does NOT manage or modify them,
- does NOT adjust odds, markets, or bet settlement,
- only informs the customer of general principles,
- escalates everything sports-related to **#sportsbook-support**.

## **9. Customer Communication Standards**

Customer communication at Rioplay follows clear operational, legal, and responsible-gaming principles. Support agents act as the company's primary point of contact and are responsible for maintaining a consistent, professional tone across all communication channels. This section outlines the standards expected from Support staff when interacting with customers.

### **9.1. General Communication Principles**

Communication with customers must remain professional, neutral, and based strictly on verified information. Agents rely only on data visible in the Back Office and on official instructions from responsible departments. Speculation, emotional commentary, assumptions, or personal interpretations are not permitted.

All information provided to customers must be accurate, concise, and aligned with internal procedures and Terms & Conditions. Agents must avoid sharing unnecessary internal details and ensure clarity without overexplaining internal processes.

#### **Key expectations include:**

- communicating factual information only;
- avoiding promises regarding outcomes or timelines unless confirmed;
- refraining from discussing internal reasons for delays or system behavior;
- maintaining confidentiality and compliance at all times.

### **9.2. Handling Difficult or Frustrated Customers**

When a customer expresses frustration, dissatisfaction, or emotional distress, the agent maintains a calm and neutral tone. Acknowledging the customer's concerns is acceptable as long as it does not imply agreement with accusations or criticism of other departments. Communication must remain centered on the actual status of the case and the required steps.

#### **Operational guidelines include:**

- avoiding arguments, defensive responses, or escalation of emotional tension;
- redirecting the conversation to factual updates and procedural clarity;
- following internal rules for abusive behavior (warnings, muting, internal notes);
- providing follow-up updates every 72 hours for any pending case involving Security, Payments, Fraud, or Technical teams.

### **9.3. Communication With VIP Customers**

VIP communication follows the same compliance and operational rules but requires elevated attentiveness and precision. VIP customers expect timely responses and clear information, and Support ensures their inquiries are forwarded without delay.

### **When working with VIP customers, agents:**

- maintain an especially polished and respectful tone;
- provide prompt updates within operational limits;
- avoid offering or implying special treatment or bonuses unless officially approved;
- communicate decisions from VIP or Payments representatives without modification.

### **9.4. Accuracy and Compliance**

All explanations provided to customers must strictly follow Rioplay's Terms & Conditions, AML/KYC procedures, and Responsible Gaming principles. Support agents do not interpret policies; they communicate them as written and may reference the relevant clause when necessary.

Only confirmed information from the Back Office or from responsible departments may be shared externally. This ensures consistent messaging across the entire Support team and minimizes misunderstandings.

### **9.5. Communication Boundaries**

Support explains processes to customers but must not disclose internal systems, investigation logic, or department-specific decision-making. Agents avoid discussing operational limitations, technical bottlenecks, or internal workflows.

#### **Not permitted to disclose:**

- internal technical causes or delays,
- fraud detection logic or risk triggers,
- internal structure or decision-making processes,
- speculative or unofficial explanations.

### **9.6. Follow-Up Requirements**

When a request requires processing by another department, Support informs the customer that the case has been forwarded and continues communication until the matter is closed. Updates and final decisions must be communicated exactly as provided by the responsible team, without rephrasing or interpretation.

Follow-up messages must be sent every 72 hours for any unresolved case, ensuring transparency and consistent customer care.

## **10. Internal Tools Used by Customer Support**

Customer Support at Rioplay relies on several internal systems that ensure accurate case handling, secure data management, and consistent communication. Each tool has a defined

purpose within the operational process, and access levels are strictly limited to maintain compliance and data integrity.

### **10.1. LiveAgent**

LiveAgent is the main platform used for all customer-facing communication. Support agents process chats, emails, internal notes, and case history exclusively through this system. Communication standards described in Section 9 apply fully to all interactions performed in LiveAgent.

### **10.2. Back Office**

The Back Office is the central operational environment where Support reviews customer information, including transactions, bonuses, KYC status, Responsible Gaming settings, and multiaccount indicators.

Support agents work only within their assigned permissions and do not modify system data or make balance adjustments.

Most actions are informational in nature, allowing Support to answer customer questions accurately.

### **10.3. Slack**

Slack is the primary internal communication tool.

Support uses it to coordinate with Payments, Security, Fraud, Technical, VIP, and other departments.

Typical Slack usage includes:

- escalating customer cases to the responsible department,
- clarifying payout or verification details,
- receiving updates from Payments or Technical teams,
- internal follow-up on pending customer cases.

*\*Slack is strictly internal and is never used for customer communication.*

### **10.4. Sage HR**

Sage HR is used for viewing shift schedules, attendance, and planned leave.

Support agents only access information relevant to their schedule; administrative edits are carried out by the HR team or managers.

### **10.5. Google Workspace (Drive, Docs, Sheets)**

Google Workspace serves as a shared environment for internal materials used by Support. This includes SOPs, internal references, spreadsheets used by managers, and project documentation.

Support agents may view documents but do not modify regulated or approval-based files unless authorized.

## **10.6. Confluence**

Confluence contains official manuals, compliance guidelines, and operational instructions. Support uses it as a reference source for approved procedures. Updates are made only by authorized managers to ensure document consistency and audit readiness.

## **10.7. Jira (Managers & Secondary Support Only)**

Jira is not used by regular Support agents. Within the Support Department, it is used only by:

- Secondary Support
- QA
- Team Leads
- Head of Support

When a technical issue requires formal investigation, the responsible manager creates a Jira ticket with the necessary materials and coordinates the investigation with the Technical Team.

## **10.8. Insightful**

Insightful may operate in the background as part of workstation monitoring required by company policy. Support agents do not interact with the tool directly and simply work within the monitored environment.

## **10.9. Data Protection Across All Tools**

All tools are operated under strict data-protection principles. Access to customer information is limited to operational necessity, and data must not be saved, exported, or transmitted outside approved systems.

Key rules include:

- customer data is accessed only when needed for case handling,
- sensitive documents are viewed only within secure company tools,
- internal channels such as Slack must not be used to store or forward personal documents unless required by procedure,
- agents follow all AML, KYC, and RG confidentiality standards.

## **11. Escalation Flow**

Escalations at Rioplay ensure that customer cases are handled by the appropriate department with the correct operational authority. This system separates customer-facing Support activity from internal decision-making, in line with Curaçao compliance requirements. Support acts strictly as the communication layer, while all decisions connected to payments, verification, fraud risk, and account restrictions are made only by authorized teams.

Escalations are documented, time-stamped, and stored in internal systems such as Back Office, LiveAgent internal notes, and dedicated Slack channels. This provides full traceability and audit readiness.

### 11.1. General Escalation Principles

Support escalates a case whenever an action requires elevated permissions or involves risk-sensitive decisions. Before escalating, the agent confirms all visible data in Back Office and records a short internal summary describing:

- what the customer requested,
- what the agent has verified,
- what action is required from another department.

This ensures that every escalation enters the review process with complete context, minimizing unnecessary delays and reducing repeated steps.

All escalated cases follow the **four-eyes principle**:

Support prepares the case, and the responsible department reviews and approves the final action.

### 11.2. Payments Team Escalations

Payment-related escalations typically involve withdrawal delays, failed payouts, unclear statuses, or error codes visible in Back Office. Before forwarding such cases, Support conducts standard checks and confirms the following:

- KYC status,
- active bonuses,
- wagering completion,
- withdrawal limits,
- multiaccount flags.

Once these are verified, the case is submitted to the Payments Team via the designated Slack channel. Payments Team performs the final verification, approves or rejects the withdrawal, or requests additional information.

Support never confirms payout timelines beyond the team's official statements and never interprets internal technical codes or banking statuses.

### **11.3. Security Team Escalations**

Security handles all KYC, SOF, verification failures, RG-related blocks, CPF issues, and identity concerns.

Support informs the customer about the verification requirement and clearly states that all document-related communication will be managed solely by Security via email.

Escalations to Security always include:

- customer ID,
- brief case description,
- any specific mismatch or rejection reason,
- confirmation of what the customer already uploaded.

Security makes the final decision independently. Support is responsible only for relaying status updates.

### **11.4. Fraud / Multiaccount Escalations**

Hard multiaccount indicators or suspicious activity trigger an automatic escalation to the Fraud channel (#support-fraud). Support prepares a short summary including:

- how the accounts are linked,
- whether bonuses were used,
- whether the win was generated from real money or bonus balance,
- and whether any previous similar flags exist.

Fraud decisions are made only by TL or HoS. Support does not remove bonuses, cancel payouts, or comment on internal risk logic. All withdrawal actions remain paused until a decision is released.

This process preserves Compliance separation and ensures that customer-facing teams do not influence fraud-sensitive decisions.

### **11.5. Secondary Support Escalations (Technical issues)**

Technical issues such as crashes, stuck bonuses, deposit button errors, or page rendering issues are escalated to Secondary Support.

Each escalation includes timestamps, customer ID, screenshots (if available), and a clear description of how the issue can be reproduced.

This structure avoids unnecessary back-and-forth communication and lets the technical team address the issue efficiently.

## **11.6. Sportsbook Escalations**

Support forwards Sportsbook-related cases—bet settlement disputes, voids, rule clarification - to the Sportsbook team.

Support does not interpret sports rules, settlement logic, or odds calculations.

Support communicates the Sportsbook answer strictly as provided, without modification.

## **11.7. VIP Team Escalations**

All VIP requests involving personal limits, tailored bonuses, or relationship management are escalated to the VIP Team.

Support maintains a more attentive communication style but does not promise any special conditions or rewards.

All final decisions come from the VIP manager.

## **11.8. Follow-Up Responsibilities**

Once escalated, Support continues monitoring the case and communicates updates to the customer every 72 hours or sooner if information becomes available.

The escalation remains open until the responsible department delivers a final verdict. Support then relays this answer verbatim to ensure consistency and compliance.

All actions - both by Support and upper-level departments - must remain traceable, time-stamped, and recorded in internal systems for future audits.

## **12. Appendix**

Appendices provide reference materials that support the operational procedures described in this Manual. These items do not introduce new rules but serve as supporting documentation for internal use and regulatory audits. All information below reflects current Rioplay tools, policies, and terminology.

### **12.1. External Policies & Legal References**

- Rioplay General Terms & Conditions
- Responsible Gaming Policy
- Bonus Terms & Conditions
- Sportsbook Terms

<https://rioplay.com/termsandconditions>

<https://rioplay.com/responsiblegaming>

<https://rioplay.com/bonusrules>

<https://rioplay.com/sportsbookterms>

### **12.2. Internal Operational Tools (Quick Reference)**

Rioplay Support and related departments use several internal systems for daily operations:

- **LiveAgent** - communication with players, ticket handling, chat & email history.
- **Back Office** - customer profiles, payments, KYC status, blocks, bonus history.
- **Slack** - cross-departmental communication (#support-payments, #support-fraud, #secondary-support, #vip, and others).
- **Sage HR** - work schedules, shift planning, leave approvals.
- **Jira** - used only by Secondary Support, QA, Team Lead, and Head of Support for escalations and internal tasks.

### 12.3. Payment Methods Summary

A simplified overview of payment categories available in Rioplay:

- Cards
- Bank Transfers
- E-wallets
- Apple Pay
- Crypto
- Local GEO-dependent solutions (PIX for Brazil, etc.)

*(Full operational rules are described in Section 7.)*

### 12.4. Block Types in Back Office

A quick reference copy of available block categories:

- Gambling problems
- Closed
- High risk fraud
- Multiaccount
- Forbidden country
- Requested by player
- Hacked account
- Underage player

*(Detailed rules and procedures are covered in Section 6.)*

### 12.5. Standard Responsible Gaming Questions

Used for reopening accounts after self-exclusion or long-term block:

1. I understand gambling is entertainment.
2. I am in control of my gambling activity.
3. I understand the risks associated with gambling.

## **12.6. Internal Slack Channels**

A non-exhaustive list of Support-related channels:

- #support
- #support-payments
- #support-fraud
- #secondary-support
- #vip
- #sportsbook

## **12.7. Document Versioning & Ownership**

- **Prepared by:** MLRO
- **Maintained by:** Head of Support
- **Last Review Date:** - 29.11.2025
- **Next Scheduled Review:** - 1.02.2026