

Player Complaints Handling Procedures

VERSION HISTORY

Version Number	Version Date	Author	Summary of Changes
V1.0			Initial Draft

APPROVALS

Name	Title	Date of Approval	Version Number

DISTRIBUTION

Name	Title	Date of Issue	Version Number

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Policy Overview

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

Applicability and Records

This policy shall apply to Joyeux B.V. (hereafter referred to as “the Company”), its users and all persons accessing any system or resource of the Company or third parties the Company has contracted (hereafter collectively referred to as “Customer Care Executives” or “CCEs”).

The team member who shall be responsible for monitoring this policy shall hereinafter be referred to as “the Designated Officer”. Any breach or suspected breach of the contents of this Policy are to be immediately notified to the Designated Officer.

The Designated Officer may, in the fulfilment of their functions, delegate specific tasks or roles to any person or persons within the Company or within a third party contracted or sub- contracted via the Company. Within this policy, any reference to any function of the Designated Officer may therefore be fulfilled by any person to whom the Designated Officer has delegated such role or function, a record of which shall be kept with each, and every appointment made, and any change thereof.

Introduction and Scope

The Company recognizes that contact with players is important to ensure that they are fully satisfied with our products and services. It is therefore important for the Company, on occasions where a player is not satisfied, to provide a means of communication for its players.

The Company seeks to ensure uniformly correct, fair, and helpful handling of all player complaints. In order that the Company operates more efficiently and further in line with its objectives and policies, as well as for relevant legal purposes, the Company has created a Player Complaints Handling Procedure.

This document shall govern complaints received by the Company through any established medium and shall apply to all Customer Care Executives ("CCEs") handling or coming into contact with player complaints.

Principles

This policy shall address the following principles:

- **Commitment:** The Company is committed to effective and fair resolution of complaints by people in the organization at all levels, including top level management. The Company acknowledge players' rights to complain and actively solicit feedback from players.
- **Fairness:** The Company recognize the need to be fair and without bias to both the complainant, and to CCEs against whom the complaint is made, or are otherwise directly affected by the outcome of the complaint. Complaints against personnel will be handled by an independent person. The outcome of a complaint will wherever possible be provided in writing with reference to the applicable policies, contracts, rules or legislation.
- **Resources:** The Company will seek to ensure we have adequate resources for complaints handling with sufficient levels of delegated authority. The Company shall further strive ensure that complaints will be reviewed by someone in an independent, objective position. The Company will provide at least one telephone number and dedicated email address to receiving complaints.
- **Access:** Our complaints handling process ensures that information is readily available on the

details of making and resolving complaints. The complaints handling process and supporting information is easy to understand and is in plain language.

- Assistance: We will offer assistance to complainants in the formulation and lodgment of complaints where required. The Company provides standard complaint forms in electronic or paper format on request.
- Responsiveness: Complaints shall be dealt with quickly in compliance with our statutory requirements.
- Charges: There will be no charge to a complainant wishing to lodge a complaint.
- Remedies: Our Complaints Handling Policy has the capacity to determine and implement remedies to the limit of authority of the individual staff member.
- Data Collection: Complaints and outcomes will be recorded in our Complaints Register and will be subject to regular analysis and reporting
- Systemic and Recurring Problems: Complaints shall be classified and analysed for the identification and rectification of systemic and recurring problems.
- Accountability: We will have appropriate reporting on the operation of the complaints handling process.
- Reviews: Our Complaints Handling Policy shall be reviewed at least annually. Note the date tracking and review dates on the front of this policy document.
- Confidentiality: Where possible, the identity of a complainant will be kept confidential

Complaints

Definition of a Complaint

Enquiry/Concern/Feedback: Any request from a player seeking information, providing feedback and/or clarification about any product or service provided by the Company or an action or procedure that the Company has undertaken or may reasonably be expected to undertake. If a matter can be addressed at this stage, it is not considered a complaint.

Complaint: Any expression of dissatisfaction relating to the quality of a product or service provided which the Company could reasonably have known was unsatisfactory. A Complaint includes an expression of dissatisfaction whether received from a player or any third party. A Complaint can be received directly from the person indicating dissatisfaction or indirectly, as a result of issues referred by a third party, including but not limited to regulatory agencies or consumer tribunals. In the latter case, the matter will be treated as a Complaint as long as we can identify adequate particulars of conduct being alleged against the Company, notwithstanding that we may not always be aware of the identity of the Complainant.

Who receives Complaints?

- Customer Support Executives
- Management
- Designated Officer

Types of Complaints

Each complaint should be treated as unique by each person tasked with handling it. However, for the purposes of efficiency, a complaint shall be categorized within a Complaint Report under one or more of the following categories:

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes

- Responsible gaming issues
- Treatment of player balances
- KYC and Verification
- Data Protection
- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation

Acknowledgement

Within one week of receiving a complaint, the operator will:

1. Confirm receipt of the complaint in writing via email or preferred communication method.
2. Provide an explanation of how the complaint will be processed
3. Expected timeline for resolution.

Submitting a Complaint

Players may lodge a complaint free of charge within six months of the incident related to their participation in a game of chance or post fixed odds betting the six month clock begins after the resolution of the specific event rather than the placement of the wager.

All communications shall be logged for quality and assurance purposes substantially in the format of a Complaint Report. The player shall be informed of this prior to the beginning of any communication, or as soon as possible thereafter.

The Company shall make available at least two channels through which a complaint may be made, these being through an online form on the website and emails.

Emails

Players may file complaints which the Company shall receive in email form by making use of the email address provided on its website.

The Designated Officer may elect for automated responses to be implemented. If the Designated

Officer chooses that they shall be used, the Designated Officer shall be responsible for their content and implementation.

When processing an email containing a player complaint, CCEs should handle complaints as follows:

Any response should be formatted as follows:

- The CCE should address the player as the player has signed off, where this is present in the email. Otherwise, the CCE should address them by their first name / title and surname.
- The CCE should write in a consistent and engaging manner which is both concise and comprehensible throughout the email, and should not change styles during the email.
- The CCE should not alter the default format of the email (font, size, colour, etc.) unless doing such clarifies a particular point or issue further. In any case, CCEs should avoid making the email look unprofessional.
- The CCE should avoid using caps, as this is interpreted as shouting.
- The CCE shall not send any email to a player without the standard corporate disclaimer.
- The CCE should thoroughly read the email in its entirety.
- Where any doubt arises regarding the nature or details of the complaint, the CCE should respond to the player and request further details.
- Where a CCE must escalate an email, they may not change the original content of the email, although they may add additional notes to provide assistance, however, a CCE must clearly indicate each part which has been added by themselves.

Online Form

The online form includes the following mandatory fields:

- Complainant's name, address, and place of residence.
- Complainant's account number
- Date of the complaint.
- Description of the conduct being disputed
- Any supporting documentation the player requires to include as part of the complaint.

Inbound Communication and Complaint

Resolution Procedures

These procedures demonstrate how CCEs shall handle communications.

The Designated Officer may, should the need arise, order that such steps shall be carried out in any other way that befits the need. The Designated Officer shall keep a log of any such changes, which shall include the date on which the changes were ordered, the rationale for the changes, and the envisaged date on which such changes shall be ended.

When dealing with any inbound communication, the CCE should proceed as follows:

1. Create a new Complaint Report, substantially in the form and format as set out in Annex A hereinafter.
2. Answer the Chat Call/Read the Email.
3. Begin Response, detailing the CCE's name and department as well as the Company name.
 - The Company name shall be included in the mandatory disclaimer, do not remove. Department should be included in the CCE's signature.
4. Ascertain whether the communication is relevant to Complaints.
 - If it is relevant to Complaints, proceed with the communication.
 - Otherwise, unless the CCE can easily resolve the issue, or Designated Officer has instructed the CCE that such communication/s shall be dealt with by them, the communication should be transferred as necessary.
5. Confirm the player's identity. The purpose of this is to determine that the person communicating is the player, as only the player is privy to such confidential information and access, and this process assists in mitigating fraud.
 - Email: If the email is in regard to confidential information and originates from an email not registered with a player, the CCE must respond by requesting the usage of the email with which the player account is registered on the website/app.
 - If in doubt of the alleged player's identity, or if otherwise suspicious, the CCE may request confirmation of additional information. If the CCE is still not confident that the player's identity has been truly confirmed, then the CCE should inform the player that at this time they are unable to process their call or complaint and advise them to try again at another time or to use a different means of communication. The CCE must then hang up, and if there is reason for suspicion, the CCE should file a Report of Suspicion, as is detailed under the Fraud Management Procedures.
6. Begin filling in the Complaint Report as necessary. It is important that sufficient attention is dedicated to communication while doing so, as follows:
 - Read the email or online form thoroughly, and ensure the Report reflects the entirety of the content
7. Identify the issue and categorise it under one of the following categories:

- CCE Handling;
- Handling with Guidance; or
- Requires Escalation.

CCE Handling

1. Resolve the issue.
2. Inform the player of the resolution, and ensure there are no further problems:
 - If the player states there are further issues:
 - Reassure the player, and where possible, offer further assistance through further CCE handling or by obtaining guidance. Should the player except this, following either of the relevant procedures.
 - Where the player does not accept either of these, or where neither of these are possible, the CCE shall offer the alternative to begin escalation procedures. Should the player accept this, begin escalation.
 - If the player states there are no further issues:
 - File Complaint Report marked as “Resolved”.

Escalation Procedures

Escalation shall take place when a player confirms that they wish to lodge a complaint, or where the complaint is of a highly serious nature.

Filling in the Complaint Report

- The CCE retains responsibility for the correct filling in of the Report, including the marking of any change in status of the Report until the moment they have marked it as resolved or requiring escalation procedures, as appropriate, and filed it.
- The CCE must file the Complaint Report in a timely manner without undue delay.
- The CCE should endeavour to accurately represent the Complaint of the player.

- All fields must be filled in. Where a field is not applicable, it should be marked as such.
- The CCE should amend the Report as necessary where they learn of any mistake or discrepancy.
- Where necessary, the CCE should make notes for clarification purposes.
- A complaint file must be opened for each complaint received and must contain at least the following information:
 - (a) A summary of the complaint;
 - (b) Background data (screenshots, copies of documents);
 - (c) File notes of discussions with the player or interviews with relevant staff;
 - (d) Copies of all correspondence sent to the client in relation to complaint; and
 - (e) Attempts that have been made to satisfy the complaint until present.
- A sample copy of the Complaint Report can be found in Annex A hereinafter.

Escalated Complaints

- All complaints will be responded to immediately by the Company.
- The Designated Officer shall be responsible for the management and resolution of escalated complaints.
- The player shall always be informed when escalation occurs, and shall be kept updated as necessary throughout the process. The player shall also be given a reference code unique to their complaint.
- A complaint shall be assessed and responded within a period of 4 weeks from when it is received. The player shall be informed within this period of the results of the inquiry into such complaint.
- Where the above is not possible, the player shall be informed that the Company requires an extension of a further 4 weeks for the resolution of the complaint, and the player shall be informed of the reasons why this extension is required. The player shall be informed of this within the 1st week of the initial receipt of the complaint.
- If the complaint can still not be resolved in such time, the player will be informed another extension shall be necessary, as well as the amount of time needed.

Responding to a Complaint

The Company will assess and respond to complaints within four weeks. If necessary due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the complainant.

A player will always receive a final determination of their complaint in writing. The response will be either:

- 1) A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
- 2) Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the Company must have requested this information within the initial four week time period. Should the complainant not provide the necessary information within that time period, the operator may reject the complaint.

Where for any reason the Company does not or is unable to resolve an issue to the player's

satisfaction, the player is informed that the matter may be escalated by the player to an independent ADR entity.

Special Circumstances

Players who have self-excluded

Where a player has self-excluded following the necessary procedures, or is otherwise legally disallowed from making use of any services or products provided by the Company, then the Company shall exercise caution when dealing with complaints from the player.

Under no circumstances will a player who, for whatever reason, is not allowed to play be granted any form of access that will enable them to play. However, the Company may still assist the player with any other issues or complaints the player might have.

Players who exhibit signs of gambling issues

The Company shall monitor player information in order to detect potential gambling issues the player may be experiencing. CCEs shall be trained to monitor for signs of such problems and shall have access to information as necessary to monitor for such problems.

If a CCE or other user authorised by the Designated Officer notes sufficient reasons to indicate that a player may have a problem with gambling issues, then the matter shall be escalated to the Designated Officer. The Designated Officer shall then review the matter and shall implement one or more of the following measures as appropriate:

- Disregard the escalated matter where the Designated Officer reasonably believes that the matter does not merit any further action;
- Order intensified monitoring on the player's actions for further scrutiny of the matter;
- Instruct the CCE to contact the player to enquire into the situation and, if necessary, recommend any material or resources, whether internal or external, in order to facilitate overcoming any issues;
- Exclude the player from any of the Company's services that sustain or worsen any gambling issues.
- Where a player is excluded, the player shall be excluded across any and all brands operated by the Company in connection with its B2C licence.

Where a player threatens to harm the CCE or another person Sometimes it may be that a player does

not seriously intend harm, but is merely venting their frustration. The Company understands that the severity of threats made during communications with players should not be underestimated. All communications where a player threatens to cause harm or to conduct any other kind of illegal activity should be taken seriously and handled with caution.

Where a player threatens to harm the CCE or another person, the CCE should warn them of the consequences of their action of threat, which shall include contacting the police and reporting the player, as well as pursuing any and all necessary legal remedies against them. If the player apologises or otherwise desists with their threats, or indicates in some way that the threat is not sincere, then this action does not need to be taken. If the player ignores repeated warnings, then the CCE may proceed with taking action as may be necessary. In such cases, the CCE should consult the Designated Officer.

Monitoring and Training

For quality and assurance purposes, communications with players are to be recorded and kept in a manner detailed in the section titled 'Record Keeping'.

The Company shall keep a log of all complaints, including those:

- 1) Resolved internally
- 2) Unresolved
- 3) Escalated to Alternate Dispute Resolution
- 4) Escalated to legal proceedings

All complaint records will be securely maintained for at least five years, including details of unresolved and complaints that have been escalated to ADR or legal proceedings.

Regulatory Reporting

The Company will:

- 1) Submit reports to the CGA on January 15th and June 15th and every year, summarizing the following:
 - a) Total number of complaints made
 - b) Total number of complaints closed (settled and rejected)
 - c) Number of pending or unresolved complaints.
 - d) Number of complaints by category.

- e) Number referred to ADR and the subsequent outcomes of each.
 - f) Number and detail of complaints for which a player has taken legal action.
- 2) Ensure transparency and compliance with ADR decisions and regulatory updates.
 - 3) The CGA reserves the right to request, at any time, access to records of any and all complaints received as well as any disputes that are pending resolution.

Annex A – Complaint Report

Reference Code	
Category/ies of Complaint	
Player Name	
Player Surname	
Player contact preferences (method + details)	
Date received	
CCE taking Complaint	
Complaint Summary	
Investigation notes + Actions taken (shall include CCEs who have been involved with the complaint)	
Action taken / recommended	
Follow-up date (if applicable)	
Attachments (data + correspondence)	
Resolved?	
For Designated Officer's use ONLY	
CCE currently assigned to handle complaint	

Annex A – Complaint Report

Reference Code	
Category/ies of Complaint	
Player Name	
Player Surname	
Player contact preferences (method + details)	
Date received	
CCE taking Complaint	
Complaint Summary	
Investigation notes + Actions taken (shall include CCEs who have been involved with the complaint)	
Action taken / recommended	
Follow-up date (if applicable)	
Attachments (data + correspondence)	
Resolved?	
For Designated Officer's use ONLY	
CCE currently assigned to handle complaint	