

Player Complaints Handling Procedure
Turn 1 B.V.

Document Control

Version	Date	Description of Changes	Author
V1.0	16.12.2025	First Draft	IGA Trust B.V.

1. Purpose and Scope

This procedure outlines how Turn 1 B.V. ensures fair, efficient, and timely handling of all complaints raised by registered players. It is intended to safeguard player rights, uphold trust in the company's operations, and comply with obligations imposed by relevant regulatory authorities. The procedure applies to all formal player complaints, regardless of their nature, provided they concern a matter that arose within the last six months and relate directly to the gaming service provided by the company.

Complaints may include but are not limited to disputes about game outcomes, bonus entitlements, technical malfunctions, delayed payments, account suspensions, and any aspect of the customer experience. Complaints that do not fall within the operational control of the company, such as payment delays attributable to third-party banks or network connectivity issues on the player's side, are handled separately and do not follow this formal complaint procedure.

2. Principles and Responsibilities

The company is committed to ensuring that all complaints are managed transparently, confidentially, and with due regard to fairness. All complaints must be recorded and tracked through a dedicated system. Each complaint must be acknowledged promptly, investigated thoroughly, and resolved within the prescribed timeframes.

Customer Support is the initial recipient of all complaints and is responsible for recording the complaint, issuing the initial acknowledgment, and attempting to resolve it at the first level. If the issue cannot be resolved within the expected timeframe or is escalated by the player, it must be referred to the Complaints Officer for a formal internal review.

The Complaints Officer is responsible for conducting an impartial evaluation, documenting all findings, and ensuring that players are informed of their right to refer unresolved matters to an Alternative Dispute Resolution (ADR) entity.

3. Definition of a Complaint

A complaint is defined as an expression of dissatisfaction made by a registered player concerning a gaming transaction or service, which is not resolved to the player's satisfaction during routine interaction with customer service.

Requests for information, feedback, or general dissatisfaction that do not require investigation or a formal outcome do not fall under this complaints procedure and are handled through regular customer service processes.

A complaint must be lodged by the account holder and must be submitted via one of the official complaint channels, such as the designated complaints email, online form, or live chat ticket, clearly marked as a formal complaint. Complaints raised through social media platforms or unofficial forums are not treated as formal complaints unless resubmitted through the appropriate channels.

4. Complaints Handling Process

Once a complaint is received, an acknowledgment is sent to the player within 24 hours, confirming receipt and providing a reference number. The complaint is then logged in the internal complaint management system, and the player is informed that a full response will be provided within 10 working days, subject to the complexity of the matter.

If the complaint is resolved during the initial assessment phase by Customer Support, a resolution notice is issued, including an explanation of the outcome and any corrective action taken. If not resolved, the complaint is escalated to the Complaints Officer, who performs a deeper review and issues a formal final response. The player is informed of the outcome and of the next steps should they wish to contest the decision.

All complaints must be resolved within 10 working days, unless additional documentation or clarifications are required, in which case the player must be kept informed and updated on the extended timeframe. The maximum resolution period shall not exceed 20 working days from the initial acknowledgment.

5. Right to Escalation via ADR

Where a player remains dissatisfied with the outcome provided by the company, they have the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) entity. The ADR entity provides an impartial forum for reviewing unresolved disputes between the company and the player, free of charge to the player.

The contact details and procedural guide for the appointed ADR entity are made available to the player in the final complaint resolution communication. Players must submit their case to the ADR

within 12 months of receiving the final response from the company. The company undertakes to cooperate fully with the ADR process and to comply with any binding decisions where applicable.

6. Documentation and Reporting

All complaints, supporting evidence, internal notes, resolutions, and correspondence are securely stored for a minimum period of five years. The Compliance Department conducts periodic reviews of complaint trends to identify systemic issues and ensure that root causes are addressed.

The complaints register includes unique complaint identifiers, player IDs, dates of receipt and resolution, classification of complaint type, and final outcome.

Any complaint involving suspected fraud, data security breaches, or regulatory violations is flagged for immediate escalation to the relevant internal departments, including Risk and Legal, and may trigger external reporting to the competent regulatory authority.

7. Staff Training and Confidentiality

All customer-facing staff receive initial and ongoing training in complaint handling, focusing on empathy, clarity, de-escalation techniques, and compliance procedures. Employees are reminded of the importance of maintaining strict confidentiality and professionalism when handling sensitive player communications.

Only authorized personnel may access complaint records. Personal data related to complaints is processed in accordance with the company's privacy policies and applicable data protection laws.

8. Policy Review

This Complaints Handling Procedure is reviewed annually to ensure alignment with legal, operational, and regulatory changes. The Compliance Department is responsible for initiating the review and recommending updates, which must be approved by senior management and communicated company-wide.

Appendix A: Template Complaint Acknowledgment Message

Subject: Complaint Acknowledgment – Reference #[ComplaintID]

Dear [Player Name],

Turn 1 B.V.

Thank you for contacting us. This email is to confirm that we have received your complaint regarding [brief summary of issue] on [date]. Your reference number is #[ComplaintID].

We are currently reviewing the details you provided and aim to respond with a resolution within 10 working days. Should additional information be required, we will contact you accordingly.

If you have further details to submit in support of your complaint, please reply to this email at your earliest convenience.

Kind regards,

Complaints Team / Customer Support Agent

Turn 1 B.V.

turn1bv@igagroup.com

Appendix B: Template Final Response Message

Subject: Complaint Resolution – Reference #[ComplaintID]

Dear [Player Name],

We have now completed our investigation into your complaint concerning [brief summary of issue]. After thoroughly reviewing the matter, we confirm the following outcome:

[Insert summary of findings, decision, and any corrective action taken.]

If you remain dissatisfied with this outcome, you may refer the matter to our appointed Alternative Dispute Resolution (ADR) entity for independent review. This service is provided free of charge to you.

Please refer to the details below:

ADR Entity Name: CADRE B.V.

Website: <https://cadre.online/>

Email: operators@cadre.online

Kindly note that complaints must be referred to the ADR within 12 months of this final response.

We appreciate your patience and understanding during the resolution of this matter.

Sincerely,

Turn 1 B.V.

Customer Support Agent

Turn 1 B.V.

turn1bv@igagroup.com

Appendix C: Complaints Escalation Diagram

PLAYER SUBMITS COMPLAINT

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Complaint Received & Acknowledged (within 24 hrs)

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Customer Support Review & Attempted Resolution (Day 1–3)

|

|--> Resolved → Final Response Issued

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Escalated to Complaints Officer (Day 4–10)

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|--> Resolved → Final Response Issued

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PLAYER STILL DISSATISFIED?

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Referral to ADR Entity (within 12 months of final response)