NIISITAPI
GAMING COMMISSION

Player Complaints Policy for B2C Licensed Operators

Document control

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1. Purpose, authority and status

1.1 Purpose

The Niisitapi Gaming Commission (the "Commission") is committed to a safe, transparent and fair gaming environment. This policy sets the minimum standards every Operator must meet when receiving, handling and resolving player complaints, and explains how independent alternative dispute resolution (ADR) works. It gives effect to the requirement for fair and accessible complaints procedures (Regulation 18.1(e)) and to Regulation 20 of the Online Gaming Regulations (the "Gaming Regulations"). Its aims are that:

- players have a simple, free and effective way to complain;
- complaints are handled promptly, fairly and in writing;
- where a player and an operator cannot agree, an independent body decides; and
- the Commission receives the information it needs to supervise operators.

1.2 Authority and effect

This policy is issued by the Commission under Regulation 46 of the Gaming Regulations. Compliance with it is a condition of every License to which it applies (Regulation 46.3). Failure to comply will be dealt with under the Commission's monitoring and enforcement procedures (section 16).

1.3 Who must comply

- Every B2C Licensee (an "Operator"), for all brands, domains, apps and gambling products offered under the License.
- Operators are responsible for compliance by anyone acting for them, including contracted service providers such as outsourced customer support (section 3.4).

1.4 Scope limits

This policy applies to complaints by Players. It does not apply to commercial disputes between an Operator and its suppliers or business partners. A report from a person who is not a Player, or a report about the Operator's regulatory compliance, may be made to the Commission under section 14.

1.5 Relationship to other instruments and proportionality

This policy is to be read with the Gaming Regulations, the ADR Policy, the Responsible Gaming Policy and the AML Code. If there is a conflict, the Gaming Regulations prevail, and a mandatory provision of applicable law prevails over both (Regulation 47). Where a complaint concerns responsible gaming or money laundering, the requirements in those documents also apply.

These are minimum standards, and Operators may offer Players more favourable terms. This policy does not affect rights under private law, and Operators remain responsible for their own legal compliance, including taking their own advice on their terms and conditions.

2. Definitions

Term	Meaning
Commission	The Niisitapi Gaming Commission (the "Commission" in the Gaming Regulations).
Operator	A B2C Licensee under the Gaming Regulations.

Term	Meaning
Player	Has the meaning in the Gaming Regulations.
Gaming Regulations	The Online Gaming Regulations.
Responsible Gaming Policy	The Commission's Responsible Gaming Policy for Licensed Operators.
AML Code	The Commission's AML/CFT/CPF Code of Practice, which is the AML Policy under the Gaming Regulations.
Complaint	A written expression of dissatisfaction by a Player about an Operator's services, decisions, terms or conduct, where the Player expects a response or a resolution.
Formal Complaint	A Complaint that (a) is submitted on the complaint form, (b) the Player asks for it to be treated as a complaint, or pursues it after a Stage 1 response (section 6.1), (c) is identified as a Responsible Gaming Complaint, or (d) has been referred to an Approved ADR Entity. Every Formal Complaint must be logged, timed and reported under this policy.
Dispute	A Formal Complaint that the Operator's internal process has not resolved to the Player's satisfaction and that has been, or may be, referred to an Approved ADR Entity or a court.
Final Response	The Operator's written decision on a Formal Complaint (section 7.3).
Responsible Gaming Complaint	A Complaint about any of the following: the targeting of Vulnerable Persons or of self-excluded persons; access to gambling by a Minor; the availability or timely implementation of cooling-off or self-exclusion; an operator-initiated exclusion; deposit limits that were not set or applied as requested; or the use of a responsible gaming measure to prevent or delay a withdrawal (section 8).
ADR Policy	The Commission's ADR Role and Approval Policy.
ADR request	A request submitted by an Operator to the Commission under section 11.2, naming the ADR entity it has appointed or nominated and enclosing a signed copy of its written agreement with that entity.
Approved ADR Entity	An independent ADR body approved or recognized by the Commission under the ADR Policy and listed on its register (section 11.3).
Authorized Representative	A person the Player has authorized in writing to act for them in a Complaint.
Working Day	A day other than a Saturday, a Sunday or a public holiday in the jurisdiction of the Commission.
Go-live date	The date on which an Operator first begins accepting Players or wagers under its License (the "Commencement of Operations" in the Gaming Regulations).
Player Funds	Has the meaning in the Gaming Regulations.
Minor, Vulnerable Person, RG Section	Have the meanings as in the Responsible Gaming Policy.
Compliance Officer, MLRO	Have the meanings as in the Gaming Regulations (Regulations 13 and 21).
PAM	The Player Account Management system in which an Operator keeps player accounts and records.
Regulatory Support Provider	Has the meaning as in the Gaming Regulations.

Term	Meaning
Complaints Procedure Statement	The Operator's published statement of its complaints procedure, containing at least the content in section 13.2.

3. General requirements

3.1 Principles

Operators must maintain fair, transparent and accessible procedures for Player complaints and disputes (Regulation 20.1). They must handle Complaints promptly, fairly, in plain language and in proportion to the issue, and must not make Players pay to complain or to use ADR.

3.2 Accessible channels and languages

- Players must be able to submit Complaints and Disputes at any time through accessible electronic channels: at least email and/or live chat for Stage 1, and an online or downloadable form for Stage 2. A telephone-only route is not enough.
- The complaint form and the Complaints Procedure Statement must be available in English and in the language of the target market. If the versions differ, the English version prevails (Responsible Gaming Policy, section 7.1).

3.3 No detriment to Players

An Operator must not:

- charge a fee to make a Complaint or to refer a Dispute to ADR;
- require a Player to give up any legal right in order to complain;
- close, restrict or otherwise disadvantage a Player's account solely because the Player has made a Complaint;
- withhold cleared funds that are not in dispute because a Complaint is open. Withdrawals continue to be processed under Regulation 19.7; or
- confiscate, forfeit or dispose of Player Funds that are the subject of a Complaint or ADR referral while it is pending, except where required by law, a court order or the AML Code.

3.4 Outsourcing

An Operator may use a supplier or contractor to receive or handle Complaints, but this does not transfer or reduce its regulatory responsibility (Regulations 13.8, 33 and 44.2). The Operator must oversee the supplier, and complaint records held by the supplier must be available to the Operator and the Commission on request.

3.5 Submission of the Operator's policy

Each Operator must submit its complaints procedure to the Commission, keep it consistent with this policy (Annex A lists the expected content) and report any material change within 30 calendar days of it taking effect.

4. Governance and staff

4.1 Responsible person

Each Operator must name a senior person responsible for complaint handling. Until a person is dedicated to the role, the Compliance Officer (who must not be the MLRO or AML/CFT officer) is responsible. Complaints that raise money laundering concerns must be escalated to the MLRO (section 10). The person responsible for responsible gaming (Responsible Gaming Policy, section 4.2) must be told promptly about every Responsible Gaming Complaint.

4.2 Authorized personnel

Complaints must be investigated by appropriately authorized personnel (Regulation 20.1): people who are trained, who have the authority to put things right, and, where practical, who were not involved in the decision complained about.

4.3 Training

Complaint handlers must be trained on appointment and at least annually, with records kept. Those handling Responsible Gaming Complaints also need the training in section 13 of the Responsible Gaming Policy, and all must know how to spot and escalate possible money laundering under the AML Code (section 10).

4.4 Annual report to management

At least annually, the person responsible must report to management on complaint handling (volumes, time limits met, causes, ADR outcomes and Responsible Gaming Complaints), with recommendations, and share the Responsible Gaming Complaint findings with the person responsible for responsible gaming (Responsible Gaming Policy, section 4.3).

5. Effective date and implementation

There is no transition period. This policy applies in full from its effective date, or from an Operator's Go-live date if later, except for the two deadlines below.

Measure	Section	Implement by
All requirements of this policy, including the complaint channels, complaint form, Complaints Procedure Statement, staff training, complaints register, and priority and human handling of Responsible Gaming Complaints	All	The effective date, or the Go-live date if later
ADR entity appointed and ADR request submitted	11.2	No later than 3 months after the Go-live date
First half-yearly complaints report	15.3	The first 15 January or 15 July after the Go-live date

6. Making a complaint

6.1 Stage 1: customer support

In the first instance the Operator must offer support by email and/or live chat. The Operator must treat a matter as a Formal Complaint as soon as it meets the definition in section 2.

6.2 Stage 2: Formal Complaint

The Operator must make a complaint form available that includes at least the content in Annex B. The form must be downloadable (to be completed and returned by email or upload) and/or completed and submitted online.

The form must not be the only route: a Complaint made by email, live chat or other written means must be accepted and logged, with help to complete the form if needed. The Operator may ask only for supporting documents reasonably needed to resolve the Complaint.

6.3 Who may complain

A Complaint may be made by the Player or by an Authorized Representative acting on the Player's written instructions. The Operator must not accept a Complaint from, or disclose account information to, anyone else without the Player's written authority.

6.4 When a complaint may be made

- A Player may complain at any time (Regulation 20.1). An Operator must not reject a Complaint for lateness alone.
- For events more than six months earlier, the Operator may decline to investigate only if the delay prevents a fair decision (for example, because the data no longer exists), giving written reasons and ADR details. A Responsible Gaming Complaint must never be declined for delay.
- For in-running betting, the Operator must warn Players that prompt action may be needed because the relevant data may not be kept for long.

6.5 Records for the Player

On request, an Operator must give the Player, free of charge, the account and transaction history and other records that are relevant to the Complaint, within 10 Working Days (see Responsible Gaming Policy, section 8.1).

6.6 Reasonable adjustments

An Operator must make reasonable adjustments for Players who need help to complain, including Players with accessibility needs and Vulnerable Persons.

7. Time limits and Final Response

7.1 Time limits

Operators must meet the following time limits. Responsible Gaming Complaints are a priority because of the possible impact on Player wellbeing.

Step	Responsible Gaming Complaints	All other Complaints
Acknowledge in writing, explain how the Complaint will be handled, and give the usual time for resolution	Within 2 Working Days of receipt	Within 5 Working Days of receipt
Final Response	Best efforts within 5 Working Days	Within 28 days of receipt
Extension	Up to 10 further Working Days, with written notice giving reasons	One extension of up to 28 days, with written notice giving reasons
Delay caused by the Player	May be extended by up to 14 days	May be extended by up to 14 days
Maximum overall time (excluding Player delay)	15 Working Days	56 days
Right to refer to ADR arises no later than	Two months after receipt	Two months after receipt

No later than two months after receipt, an unresolved Complaint must be referred to ADR or the Player given the right to refer it, whatever extension or Player delay applies (Regulation 20.3). The Commission may set a shorter period.

7.2 Information from the Player

If the Operator needs more information, it must ask promptly, normally within the acknowledgement period in section 7.1. If the Player does not respond within a reasonable time (at least 14 days), the Operator may close the Complaint with written reasons and ADR information.

7.3 Final Response

The Player must always receive the outcome and reasons in writing (Regulation 20.1): either a reasoned decision, with evidence where needed, or detailed reasons for not handling the Complaint. The Final Response must state:

- the outcome and the reasons for it;
- what the Operator will do to put things right, if the Complaint is upheld in whole or in part, and by when;
- that the Player may refer the Dispute to an Approved ADR Entity free of charge, how to start ADR, any eligibility requirements, the ADR entity's contact details and the time limit in section 11.4 (Regulation 20.3);
- that the Player keeps the right to take legal action;
- that the Commission does not decide individual disputes; and
- that the Player may contact the Commission about suspected malpractice or breaches of License conditions (section 14.3).

7.4 Limits on disclosure

A Final Response may omit only information the law prohibits disclosing, such as a suspicious-activity report (section 10.2). It must not mislead the Player and must still include the ADR and Commission information.

7.5 No Final Response in time

If the Operator has not issued a Final Response by the end of the maximum period in section 7.1, it must tell the Player in writing that the Player may now refer the Dispute to an Approved ADR Entity.

7.6 Putting things right

An upheld Complaint must be remedied within the time stated in the Final Response, which must not exceed 10 Working Days unless the Player agrees. Payments of Player Funds must go through the Operator's safeguarded arrangements (Regulation 19).

8. Responsible gaming complaints

8.1 Priority and identification

A Complaint becomes a Responsible Gaming Complaint, and a Formal Complaint subject to the faster time limits in section 7.1, as soon as it is identified as one, whether by the Player (for example, by choosing the category in Annex C), by staff or by a flag in PAM.

8.2 How they are handled

- Responsible Gaming Complaints may be made through the RG Section contacts (email or chat) as well as the general route (Responsible Gaming Policy, sections 7.1 and 7.2). Staff who receive one there must pass it on straight away.
- Communication with the Player must be by a human, not automated tools (section 9).
- Each one must be recorded in PAM together with the related responsible gaming interaction records, the indicators of concern and the action taken (Responsible Gaming Policy, section 9.4).

8.3 Specific situations

- **Self-exclusion or cooling-off did not work.** The Operator must investigate. Wagers placed after the request and before it took effect must be voided and the funds returned, taking civil law into account (Responsible Gaming Policy, section 10.5).
- **A request to end self-exclusion early.** A self-exclusion cannot be reversed or revoked during the chosen period (Responsible Gaming Policy, section 10.5). The Operator must decline, explain why, point the Player to support resources, and must not offer any inducement to return.
- **A Minor.** Where an Operator learns that a Player is a Minor, section 6.4 of the Responsible Gaming Policy applies, and the Complaint must be handled by a senior person.
- **An operator-initiated exclusion.** The Operator must review its documented decision and give reasons. It may not exclude a Player solely because of the amount of their winnings (Responsible Gaming Policy, section 11).
- **A protective measure used to delay a withdrawal.** This breaches the Responsible Gaming Policy (section 9.5). If upheld, it must be notified to the Commission within 5 Working Days.

9. Use of artificial intelligence and automation

An Operator may use AI or other automated tools to handle Complaints, provided that:

- once a Complaint is identified as a Responsible Gaming Complaint, communication with the Player is by a human;
- Complaints that are reasonably complex, involve a Vulnerable Person or involve a significant sum are handled by a human;
- the Player is told when dealing with an automated tool and can ask for a human;
- automated outcomes are reviewed at least quarterly to check they are reasonable and consistent across Players with like-for-like Complaints; and
- the Operator remains fully responsible for every decision.

10. Money laundering concerns and serious matters

10.1 Complaints about due diligence

Complaints about identity checks, source-of-funds requests, or a hold or closure arising from customer due diligence are handled under this policy. Where a hold or closure is due to missing information (not suspicion), the Operator must tell the Player what is needed and by when (AML Code, Parts IV.3 and IV.9).

10.2 No tipping off

An Operator and its staff must not disclose to the Player, an Approved ADR Entity or any unauthorized person that a suspicious-activity report has been made or considered, or that an investigation is under way (Regulation 21.3; AML Code, Part V.2). Staff who see signs of possible money laundering must escalate them to the MLRO. On the MLRO's advice the Operator may limit what it tells the Player, but must still meet the time limits in section 7.1 and give the information in section 7.3, unless the Commission directs otherwise.

10.3 Frozen and restricted funds

Nothing in this policy requires an Operator or ADR entity to release funds where the law prohibits it, including funds frozen or blocked under the AML Code. The Operator must explain to the Player what it lawfully can.

11. Alternative dispute resolution (ADR)

11.1 Requirement

Where a Complaint cannot be resolved internally, the Operator must give the Player access to an independent ADR entity approved or recognized by the Commission (Regulations 20.2 and 20.3). ADR is free of charge to the Player, and the Operator bears all the costs of the process.

11.2 ADR agreement

Each Operator must appoint at least one independent ADR entity and, within 3 months of its Go-live date (or of the effective date, if already live), submit an ADR request naming the entity with a signed

copy of their written agreement (Regulation 20.2). An entity not yet listed must apply under the ADR Policy, and the agreement takes effect once it is approved. The Operator must notify the Commission within 5 Working Days if the agreement ends, and replace a suspended or removed entity without delay.

11.3 Approved ADR Entities

The Commission approves or recognizes ADR entities under Regulations 22.1(h) and 43.1 and the ADR Policy. It may take existing approvals elsewhere into account, but vets every entity and recognizes none automatically. It publishes the register of Approved ADR Entities. An entity may apply at any time, and an Operator may nominate one.

The ADR Policy sets out the role of ADR entities, the eligibility criteria (including independence, expertise and the 90-day time target), vetting, the register, ongoing obligations, and suspension and removal. An Operator must not seek to influence an ADR entity's decision, or use an entity that is not an Approved ADR Entity.

11.4 Referral to ADR

A Player may refer a Dispute to an Approved ADR Entity if dissatisfied with the Final Response, if the maximum period in section 7.1 has ended without one, if two months have passed since the Operator received the Complaint, or if the Operator has refused to handle it. The referral must be made within six months of the Final Response or, if there was none, of the end of the maximum period.

11.5 Cooperation with the ADR entity

The Operator must cooperate fully with the ADR entity, providing the records, transaction information, correspondence and documents reasonably required (Regulation 20.3) within 10 Working Days of a request, and replying to further enquiries within 10 Working Days. It must not obstruct a referral or disclose information the law prohibits (section 10.2).

11.6 Preventing abuse

An Operator may set reasonable measures to prevent abuse of ADR (for example, a minimum claim value). They must be stated in its Complaints Procedure Statement and never applied to Responsible Gaming Complaints. The Commission judges each measure on its merits: a low value does not make a claim trivial, and matters such as the admission of a self-excluded person must always be taken seriously.

12. ADR decisions and outcomes

12.1 Decision

The ADR entity decides the Dispute on its merits and gives its decision in writing with reasons.

12.2 Binding effect

A determination of an Approved ADR Entity is binding and must be implemented within the period it sets, or 14 days if none, subject to any right of appeal, review or other remedy under applicable law (Regulations 20.3 and 37.1(o)). An Operator must not restrict the Player's right to go to court or make ADR a precondition to doing so.

12.3 Implementation

The Operator must implement the determination, including any payment of Player Funds through its safeguarded arrangements (Regulation 19), and confirm in writing to the Player and the ADR entity that it has done so.

12.4 Non-compliance

An Operator that does not intend to comply, or has not complied, with an ADR determination must notify the Commission within 5 Working Days. Failure to comply may constitute serious non-compliance (Regulation 37.1(o)).

12.5 One referral per Dispute

Once an ADR entity has decided a Dispute, neither party may refer it to another ADR entity. A Dispute withdrawn by the Player after ADR has begun may be referred again only with the ADR entity's consent for good reason; the Operator may not restart it.

12.6 Limits on what ADR can order

An ADR entity cannot require an Operator to do what the law prohibits (section 10.3), or to reverse or shorten a self-exclusion during the chosen period (section 8.3).

13. Information to players

13.1 Publication

- Each Operator must publish its Complaints Procedure Statement prominently on each Platform, as a standalone link in the homepage footer (in addition to the items in section 7.4 of the Responsible Gaming Policy) and in, or referenced from, its terms and conditions, which must be no more than one click from the homepage (Responsible Gaming Policy, section 7.3).
- It must be available in English and the language of the target market, and the English version prevails if they differ.
- The Operator may ask Players to confirm acceptance of the Statement (for example by tick box or at registration), subject to applicable private law.

13.2 Minimum content

The Complaints Procedure Statement, and the matching section of the terms and conditions, must include at least the following.

No.	Content
1	How to contact customer support, with links to the customer service channels.
2	How to make a Formal Complaint, what information is needed, and links to the online form and/or the downloadable form.
3	The three stages (support, Formal Complaint, ADR), the time limits for each, and that a Player may complain at any time.
4	That complaining is free and that the Player's account will not be penalized for complaining.

No.	Content
5	That Responsible Gaming Complaints may be raised through the RG Section contacts and are handled first.
6	The Player's right to ADR, free of charge: how to start it, any eligibility requirements, and the six-month time limit (Regulation 20.3).
7	The effect of the ADR decision: that it is binding, subject to any right of appeal, review or other remedy under applicable law, and that the Player keeps the right to take legal action.
8	Any measures the Operator uses to prevent abuse of ADR (section 11.6).
9	The statement about the Commission's role in section 13.3.

13.3 The Commission's role

The Operator must state clearly that the Commission does not decide or mediate individual disputes, and that Players may contact the Commission under section 14.3 if they believe the Operator has breached its License conditions or the law, giving the Commission's contact details.

14. Role of the Commission and reports to it

14.1 What the Commission does and does not do

The Commission does not resolve, mediate or decide individual complaints or disputes, or review the merits of an Operator's or Approved ADR Entity's decision. It uses the information it receives for supervision, risk assessment, inspection and enforcement (Regulations 20.5 and 22.1).

14.2 Inadequate handling

Where an Operator handles a Complaint inadequately (for example, by not following this policy, refusing to handle it, obstructing ADR or not complying with an ADR decision), the Commission may act against the Operator under section 16. That action concerns the Operator's conduct; it does not re-decide the complaint.

14.3 Reports to the Commission

- Any person, including a Player, may contact the Commission about suspected malpractice or a breach of License conditions or the law, or to make a whistleblowing disclosure. Operators must not restrict, discourage or retaliate against this.
- Reports should be in writing, in English, identify the reporter and the Operator, and say what happened and what has already been done to raise it with the Operator.
- The Commission will acknowledge and assess each report and decide at its discretion whether to act. It need not report the outcome to the reporter.
- The Commission may decline a report that is only a disagreement on the merits, is already before an ADR entity or court, or has not first been raised with the Operator (except whistleblowing or urgent matters).
- The Commission will treat reports confidentially, subject to law.

14.4 Regulatory Support Provider

The Commission may assign functions under this policy to an Regulatory Support Provider (Regulation 23). Operators must cooperate with the Regulatory Support Provider to the same extent as with the Commission.

15. Records, reporting and supervision

15.1 Records

Record	Minimum retention
Complaints register entries and all correspondence, investigation notes and decisions	At least 5 years after the Complaint is closed
Responsible Gaming Complaint records (in PAM)	5 years
ADR files, determinations and confirmations of compliance	At least 5 years after the Dispute is closed
Training records for complaint handlers	At least 5 years after the training is delivered
Annual complaints report to management and management response	7 years

Records must be complete, kept in line with data protection law and made available to the Commission or the Regulatory Support Provider on request (Regulations 13.1(j) and 24.2), and kept longer where other law or a competent authority requires.

15.2 Complaints register

An Operator must keep a complaints register that records, for every Formal Complaint: the Player, the date received, the category (Annex C), the issue, key dates, the outcome, any extension, any ADR referral and outcome, any legal action known to the Operator, and any notification to the Commission.

15.3 Half-yearly reporting

Each Operator must report to the Commission twice a year using Annex D: by 15 January (for 1 July to 31 December) and by 15 July (for 1 January to 30 June). The first report is due on the first of those dates after its Go-live date and covers the period since then. Reports must be complete and accurate and, where required, certified by an authorized officer (Regulation 25.5).

15.4 ADR entity reporting

Approved ADR Entities report to the Commission on the Disputes referred to them, and their outcomes, as required by the ADR Policy (Annex B), at least half-yearly.

15.5 Supervision

- The Commission may ask for any record required by this policy at any time, and Operators must provide it within 15 calendar days of the request.
- The Commission may review, inspect or audit an Operator’s complaint handling, controls and records, and Operators must cooperate (Regulations 13.1(h) and 24).

- Operators must report any material change to their complaints procedure or ADR arrangements (section 3.5).

16. Compliance and review

16.1 Compliance

Compliance with this policy is a condition of the License. Breaches will be dealt with under the Commission's enforcement procedures and the Gaming Regulations, which may include directions to remedy, additional License conditions, penalties, suspension or revocation. Failing to cooperate, giving false or incomplete information, or ignoring a corrective direction may be serious non-compliance (Regulation 37.1(b), (j) and (l)); corrective measures and penalties are available under Regulations 38 and 39, and serious or repeated breach of player-protection requirements may justify revocation (Regulation 41.2(g)).

16.2 Review of this policy

The Commission will review this policy at least every two years and after any significant regulatory change, and publish changes with their effective date.

Annex A. Checklist for an Operator's complaints policy

An Operator's complaints procedure and ADR arrangements submitted to the Commission should address each item below.

The Operator's policy should...	Section	Confirmed
Name the person responsible and describe the annual report to management	4.1, 4.4	[ ]
Describe the complaint channels, languages and complaint form	3.2, 6	[ ]
Describe the stages, time limits and the fast track for Responsible Gaming Complaints	7, 8	[ ]
Describe how Responsible Gaming Complaints are identified, recorded in PAM and handled by a human	8, 9	[ ]
Describe any use of automated tools and how it is monitored	9	[ ]
Describe how due-diligence and money laundering related complaints are handled, without tipping off	10	[ ]
Name the ADR entity and describe how a Player refers a Dispute, eligibility, time limits and any anti-abuse measures	11	[ ]
Describe how ADR determinations are implemented	12	[ ]
Describe the published Complaints Procedure Statement and where it appears	13	[ ]
Describe any outsourcing of complaint handling and how it is overseen	3.4	[ ]
Describe the complaints register, record keeping, staff training and reporting	4.3, 15	[ ]
Describe review of the complaints procedure	16	[ ]

Annex B. Complaint form: minimum content

The complaint form must include at least the following sections. The Operator may add fields, but must not make the form longer or more demanding than is needed to handle the Complaint.

No.	Section	Details
1	Complainant	Full name, address and place of residence, and contact email.
2	Account	Account number or username (if applicable).
3	Dates	Date of the Complaint and date of the disputed event.
4	Category	A choice from the categories in Annex C, clearly showing the priority categories.
5	Description	A description of the conduct or decision being complained about, including any amounts involved.
6	Steps already taken	What the Player has already done to resolve the matter with the Operator.
7	Outcome sought	What the Player would like the Operator to do.
8	Supporting documents	A way to attach or list any supporting documents.
9	Representative	Details of any Authorized Representative and confirmation of written authority.
10	Data notice	A short notice explaining how the Player’s data will be used to handle the Complaint.

Annex C. Complaint categories

A Player may complain about any part of their relationship with the Operator. These are the minimum categories an Operator must offer on its form and use in its register and reports. Categories marked "Priority" are Responsible Gaming Complaints and follow the faster time limits in section 7.1.

No.	Category	Note
1	Deposit issues	
2	Withdrawal issues	
3	Bonus terms and conditions	
4	Account closures or restrictions	
5	Alleged errors or unfairness in game outcomes	
6	Responsible gaming issues, including marketing to Vulnerable Persons	Priority
7	Self-exclusion and cooling-off	Priority
8	Operator-initiated exclusion	Priority
9	Issues involving Minors	Priority
10	Treatment of Player Funds and balances	
11	KYC, verification and source-of-funds requests	See section 10.1
12	Data protection and privacy	
13	Technical or software issues	
14	Money laundering concerns	See section 10.2
15	Fraudulent games or practices	
16	Advertising and marketing (other)	
17	Dormant accounts and remitted balances	
18	License or regulation issues	
19	Unfair terms and conditions	
20	Other	

Annex D. Half-yearly complaints report: template

Operators report the following for each half-year. The Commission may issue an electronic template with the same content.

No.	Item	Period figure
1	Operator name, License number and reporting period	
2	Total Formal Complaints received	
3	Formal Complaints by category (Annex C)	
4	Responsible Gaming Complaints received, and number resolved within 5 Working Days	
5	Settled: upheld / partly upheld / rejected	
6	Pending or unresolved at period end	
7	Average time to Final Response; number where an extension was used	
8	Referred to ADR; ADR outcomes (upheld / partly upheld / rejected / withdrawn / pending)	
9	ADR determinations complied with / awaiting compliance / not complied with	
10	Number and detail of Complaints where legal action is known to have been taken	
11	Patterns or causes identified, and action taken (short narrative)	

Annex E. Illustrative player-facing wording (guidance)

This wording is guidance only. Operators may use their own wording, provided it is plain, clear and meets the requirements of this policy.

Use	Illustrative wording
Acknowledgement	We have received your complaint (reference [number]). It will be handled by [team]. We will send you our final response within [28 days / 5 working days]. If you are not satisfied, you can take it to [ADR entity] free of charge.
Extension notice	We need more time to reach a fair decision because [reason]. We will reply by [date]. If your complaint is not resolved within two months of the day we received it, you can refer it to [ADR entity] free of charge.
ADR paragraph in a Final Response	If you are not satisfied with this response, you can refer your complaint, free of charge, to [ADR entity] at [contact details] within six months of the date of this letter. [Eligibility requirements.] You may also take legal action.
Statement about the Commission	The Niisitapi Gaming Commission does not decide individual disputes. If you believe we have breached our License conditions or the law, you may contact the Commission at [contact details].
Request to end a self-exclusion early	Your self-exclusion cannot be ended before the period you chose has finished. Support is available at [support links].