eCOGRA Annual ADR Report

1 October 2019 to 30 September 2020

| DISPUTE VOLUMES | |
|---|------|
| Total Number of Disputes Received | 1142 |
| Total Number of Domestic Disputes | 1142 |
| Total Number of Cross-Border Disputes 0 | |

| DISPUTE STATUS | |
|----------------------|-----|
| Completed | 602 |
| Refused/Discontinued | 540 |

| TOTAL COMPLETED DISPUTES BY TYPE | |
|----------------------------------|-----|
| Bonuses & Promotions | 100 |
| Deposits & Withdrawals | 196 |
| Disputed Bets | 29 |
| Game Fairness | 21 |
| ID Verification | 51 |
| Locked Accounts | 84 |
| Responsible Gambling | 116 |
| Game or Event Results | 5 |

| SYSTEMATIC PROBLEMS | |
|------------------------|--|
| Deposits & Withdrawals | The majority of disputes related to operator requests for enhanced due diligence ('EDD'), including source of funds and/or wealth, in line with regulatory requirements. Consumers are often confused and/or concerned by the request for financial evidence. Additional guidance to consumers by the Gambling Commission and operators will help alleviate the need to escalate these complaints to an ADR. Another area of concern is the funding of player accounts by 3 rd party payment methods in breach of the operator terms and conditions and AML requirements. |
| Responsible Gambling | The remit of the ADR service provider is to investigate transactional and/or contractual disputes. When the dispute is a responsible gambling issue, this is deemed to be regulatory matter. If the consumer believes that a gambling operator has acted irresponsibly towards them, a complaint should be lodged with the Gambling Commission and not the ADR service provider. Further guidance from the Gambling Commission and operators will provide much needed clarity to vulnerable consumers. |

| TOTAL REFUSED DISPUTES BY TYPE | |
|---|-----|
| Total Number of Refused Disputes | 535 |
| Operator Dispute Process Not Exhausted First | 251 |
| Disputes Closed at the Player's Request | 28 |
| Player Communication Ceased | 1 |
| Frivolous or Vexatious Disputes | 3 |
| Operator Not Registered with eCOGRA | 4 |
| Dispute Claim Value Below Threshold | 0 |
| Disputes Outside 12 Month Time Limit | 9 |
| Duplicate Dispute/Dispute Already Submitted | 23 |
| GB Gambling Commission Regulatory Issues | 204 |
| Too Complex/Requires Legal/Police Investigation | 12 |

| DISCONTINUED DISPUTES | |
|---|---|
| Number of Disputes Discontinued for Operational Reasons | 5 |
| Reasons for Discontinuing Disputes | Disputes are discontinued if for operational reasons the dispute cannot be completed. |

| AVERAGE RESOLUTION TIME | |
|---|---------|
| Average Time Taken to Resolve Domestic Disputes | 19 days |

| RATE OF COMPLIANCE WITH RESOLUTION | |
|-------------------------------------|---|
| Resolutions in Favour of the Player | To the best of our knowledge, any resolutions made in favour of the player have been complied with. We strongly believe that if the resolution was not complied with the player would have contacted us again to receive an update. |

| ADR NETWORK CO-OPERATION | |
|-------------------------------------|--|
| Meetings with ADR Service Providers | eCOGRA have actively engaged with other ADR Service providers to discuss common issues and highlight areas of concern. |

| DISPUTE CONCLUSIONS | |
|--|-----|
| % Ruled in favour of the operator | 64% |
| % Conceded by operator (either as a goodwill gesture or admission of fault) or | 25% |
| compromise agreed with the player | |
| % Ruled in favour of the consumer | 11% |