



## **INTERNAL REGULATION ON COMPLAINTS AND DISPUTES SETTLEMENTS**

### **Article 1. Dispute cases are handled according to Internal Regulation on Complaints and Disputes Settlements**

Dispute means a customer and the Company, or any person on behalf of or with the Company, have any dispute relating to:

- 1.1.Amount of winnings, losses or prizes or allocation of cash, prizes, benefits, tickets or any other matter or matters in a game, round, session or similar activities or events; or
- 1.2.The manner in which a game, round, session or similar activity or event is conducted.
- 1.3.Other disputes related to Section 1.1 and Section 1.2 between players and players, players and the Company and players and employees of the Company
- 1.4.Complaints or disputes relating solely to commercial matters and outside Sections 1.1, 1.2, 1.3 above, including but not limited such as service in the restaurant, quality of decoration or facilities or availability at a particular table will not apply in this case.

### **Article 2. Responsibilities of players and the Company for reporting and reflecting on cases prize-winning games do not take place following the Game Rules and requesting the Company to resolve**

- 2.1. Players have the right to report and feedback on cases in prize-winning games do not take place following the Game Rules and request the Company to resolve them.
- 2.2. Players can report and feedback directly at the casino business location or via email, phone number or send a written letter to the Company in English or Vietnamese.
- 2.3. The Company's Legal Department, based on consultation with the Company's Internal Controls Committee (“ICC”) will receive and handle reported cases according to the procedures specified in this Regulation.

### **Article 3. Status conditions for complaints to be considered and handled**

- 3.1. Customers have the right to make any complaints or dispute requests at any time and must report and reflect directly at the Casino Business Point or via email, phone number or send a written letter to the Company in English or Vietnamese within no more than 06 months from the date of dispute.

3.2. The following complaints may be refused processing:

3.2.1. Customers do not attempt to contact the Company and resolve the issue directly with the Company before resolving the case at a competent authority.

3.2.1. Complaints have been and are being directly reviewed and resolved by any competent authority in Vietnam.

3.2.3. Complaints are not sent to the Company within the time stated in Article 3.1.

3.2.4. Complaints related to requests contrary to regulation or the Company's obligations under current law.

3.2.5. Complaints or disputes from or related to customers who do not belong to the group of Persons Allowed to Enter and Exit the casino premises.

3.2.6. Complaints from or relating to any individual violating published gambling rules, internal Regulation and/or internal management Regulation or current laws.

#### **Article 4. Procedures for resolving disputes between players and businesses**

4.1. When a dispute arises, a Supervisor or above from the respective gaming operational area of The Grand Ho Tram must be notified immediately to conduct an investigation on the dispute and to obtain a resolution of the dispute.

4.2. During the course of the investigation, when Surveillance notification and clearance is required, Supervisors or above are the authorized person to request a review of relevant surveillance footage from the Surveillance Department. Surveillance Supervisors or above record information that includes, but not limited to, the following;

- a) Review requester's name and employee number;
- b) Time of incident;
- c) Description of the case and dispute;
- d) Location, such as machine number, table number, cage window number, etc.;
- e) Patron's name, account ID and/or patron's description, if necessary;
- f) Disputed amount;
- g) Conclusion of the review; and
- h) Time and name and employee number of the person who receives the Surveillance's review conclusion.

4.3. The Grand Ho Tram will conduct thorough investigation on available information, such as system records, machine data, interviews of the related parties, review of the surveillance footage, etc., in order for the Legal Department to resolve any patrons' disputes in strict accordance with the game rules and the provisions of gaming regulations and laws. In general, the following information related to the dispute being investigated should be recorded by the Supervisor or above in a computerized system record, in writing or in an official memorandum:

- a) Patron's name and ID, if any;
- b) Cause of dispute;
- c) Surveillance officer's name, if the investigation involved Surveillance assistance;
- d) Results of the investigation conducted into the disputed matter;
- e) Dispute resolution, if applicable; and;
- f) Name and employee number of the Supervisor or superior investigating the dispute.

4.4. If the dispute is determined to be a result of a gaming equipment malfunction or a procedural error found in favor of the patron, The Grand Ho Tram management will take the following actions to resolve the dispute:

- a) The Grand Ho Tram may withhold all wagering amounts and/or winning amounts involved in and related to the dispute or gaming equipment malfunction indefinitely and until such time that an investigation is complete and the legitimacy of the win is reasonably verified, unless otherwise provided by law;
- b) The gaming equipment involved be shut down pending an investigation; or
- c) The employees involved in the procedural errors shall be counseled in accordance with the policies and procedures set forth by The Grand Ho Tram.

4.5. The signatory authority of each respective gaming department applies when patron is paid.

4.6. All supporting documents related to patron dispute payouts or adjustments are sent to the Casino Accounting Department for audit purposes on a daily basis and all other relevant patron dispute related documents are retained and readily available for review upon written requests from the appropriate government gaming regulatory agencies of the Socialist Republic of Vietnam.

4.7. Whenever a patron and The Grand Ho Tram, or any person acting on behalf of or in conjunction with The Grand Ho Tram, have any dispute that cannot be resolved by the applicable gaming department management to the satisfaction of the patron, the applicable gaming department management shall notify in writing to the Legal Department of The Grand Ho Tram and request that the Legal Department resolve the disputed issue. Customers will be informed of their right to submit a formal complaint and instructions for completing the Complaint Document including the Player Complaint Form according to the Company's internal Regulation as applicable from time to time. The complaint form will include the following information: Player Name; Contact number; Email address; Date and time of the incident; Location where the incident occurred; Describe the incident in detail; The name or employee ID of the team member involved (if known to the Player).

4.8. The Grand Ho Tram is authorized by the competent authority to regulate gambling to refuse to allow the following players to play in its casino area by not allowing entry or expelling them from the play casino area:

- a) Any individual not included in the group of Persons Allowed to Enter and Exit a Play Venue in this standard document; or

- b) Any individual who violates published gambling rules, internal Regulation and/or internal management Regulation.

4.9. The Grand Ho Tram will conduct any investigation deemed necessary and determine if payment is made. This investigation included a review of surveillance data and interviews with employees and customers. The Legal Department of The Grand Ho Tram will send by post or email a written notice to the customer about the dispute resolution decision of The Grand Ho Tram within 45 days from the date the Legal Department of The Grand Ho Tram receives initial notification from a gambling authority or a request from a customer to conduct an investigation to resolve the dispute.

4.10. In case the customer is not satisfied with the decision of The Grand Ho Tram, the customer can continue to submit a request to the competent authority or court.

4.11. The Grand Ho Tram fully supports the purpose that prize-winning gaming must be conducted in a fair and open manner and must strictly comply with the game rules..

4.12. In the event that a player is dissatisfied with the decision of The Grand Ho Tram and the entire internal process for resolving the dispute does not lead to the desired result, the player can always refer the dispute to resolution by whether a dispute resolution authority, if any, or, final settlement by competent courts or arbitrators in Vietnam.

#### **Article 5. Procedures for Resolving Disputes Between Players and Employees**

5.1. In the event of a dispute between players or between a player and a Company employee, the involved parties must remain calm, avoid causing disorder at the casino business location, and immediately notify a Supervisor or direct manager on site.

5.2. The Supervisor or manager will record the incident, collect information from the involved parties and witnesses (if any), and extract surveillance data to verify the incident.

5.3. If the dispute involves violations of internal regulations, internal management rules, or shows signs of violations of the law (e.g., fraud, disturbance, assault, etc.), the Supervisor must promptly report to the Legal Department for handling under its authority.

5.4. The Legal Department has the authority to propose internal measures such as: issuing warnings, refusing service, requesting individuals to leave the casino area, or referring the case to the police if there are signs of criminal conduct.

5.5. The Legal Department, led by the Legal Director, has the authority to resolve disputes as stipulated in this Article, based on consultation with the Company's ICC.

5.6. If the player or employee disagrees with the decision of the ICC, they have the right to file a formal complaint regarding the incident as per the procedure in Article 4.7 or request resolution by a competent authority.

#### **Article 6. Rights, obligations and responsibilities of players**

- 6.1. Have the right to complaints and lawsuits against businesses regarding bonus payment results, and denounce fraudulent acts and violations of Regulation..
- 6.2. Have the legal rights and interests according to the provisions of the game rules announced by the enterprise.
- 6.3. Other rights and obligations according to current laws.
- 6.3. Must bring documents proving that you are eligible to play according to the law..
- 6.5. Comply with game rules, rules and relevant internal management Regulation of the business.
- 6.6. Fulfill all tax obligations according to current legal Regulation..
- 6.7. Do not use the results of games at the Casino Business Point to bet directly with other players.
- 6.8. Ensuring security, order and safety at casino business locations.
- 6.9. Other obligations according to current Regulation.

**Article 7. Rights, obligations and responsibilities of the company**

- 7.1. Resolve disputes and complaints of players following the Game Rules and Legal Regulation
- 7.2. Have the right to refuse to resolve disputes or complaints if they fall into the cases specified in Article 3.2 of this Regulation.
- 7.3. Other rights and obligations according to the Company's internal Regulation and current laws.