

Notice of Collective Proceedings Order Application and Hearing

Individuals who made purchases of PC games or add-on content for PC games in the UK via Steam or alternative distribution platforms or storefronts could benefit from a proposed collective proceedings.

This is a legal notice that has been issued at the direction of the Competition Appeal Tribunal

- Vicki Shotbolt Class Representative Limited (“**Vicki Shotbolt CRL**”) has filed an application to bring collective proceedings as a class representative on an opt-out basis against Valve Corporation (“**Valve**”). The claim has been filed with the Competition Appeal Tribunal (“**Tribunal**”) by Vicki Shotbolt CRL on behalf of a proposed class of individuals that it claims have suffered loss due to Valve’s conduct.
- The Consumer Rights Act 2015 (the “**Act**”) allows collective proceedings to be brought on behalf of a group of individuals in respect of alleged breaches of competition law. Under the Act, a class representative can pursue collective proceedings for an alleged infringement of competition law, bringing together individual claims that raise the same, similar, or related issues of fact or law (“**common issues**”). For collective proceedings to be brought, the Tribunal must first make a collective proceedings order (a “**CPO**”) authorising an applicant to act as a representative of the class and certifying the proposed claim as eligible for inclusion in collective proceedings.
- Vicki Shotbolt CRL has applied to the Tribunal for a CPO which, if granted, would allow its proposed claim to proceed to a full trial. Vicki Shotbolt CRL alleges that Valve’s gaming platform Steam is likely to hold a dominant position and it has abused its allegedly dominant position by allegedly: (i) imposing price parity obligations that do not allow PC Games publishers and developers to sell their product elsewhere on better terms than on Steam; (ii) charging publishers excessive and unfair commission rates for distribution of PC games and Add-on Content; and (iii) restricting the ability of users to purchase Add-on Content for games purchased on Steam through other distribution channels. As a result, Vicki Shotbolt CRL alleges that the Proposed Class have been overcharged. Valve denies any wrongdoing and does not accept that the Proposed Class has been overcharged.
- At a hearing scheduled to commence on 14 October 2025 at 10:30am, the Tribunal will hear arguments as to whether Vicki Shotbolt CRL should be authorised to act as the class representative and whether the claims Vicki Shotbolt CRL is bringing can proceed as opt-out collective proceedings on behalf of the proposed class. If this approval is given, there will be further procedural steps and exchanges of evidence before the proceedings go to trial to

determine whether or not Valve has breached competition law and is liable to pay damages to the Proposed Class Members. The proposed class (the “**Proposed Class**” and “**Proposed Class Members**” or “**PCMs**”) includes all Persons who during the Class Period, made one or more payments for the purpose of purchasing a licence to: (a) PC Games; and/or (b) Add-on Content for PC Games, including subscription payments for PC Games and/or Add-on Content (collectively “**Relevant Purchases**”). Further detail on the Proposed Class is set out in Question 6.

- If Vicki Shotbolt CRL’s claim is certified, those who are domiciled in the UK and fall within the class definition of the claim that the Tribunal certifies will automatically be included in that claim, and will be bound by any judgment or settlement, unless they choose to opt-out. Those who fall within this definition but are not domiciled in the UK but wish to participate in the claim would have the opportunity to opt-in to the claim. For more details on this please visit www.steamyouoweus.co.uk.
- The hearing, scheduled to commence on 14 October 2025 at 10:30am, will last for one day (with one day (15 October 2025) in reserve) and will take place at the Competition Appeal Tribunal, Salisbury Square House, 8 Salisbury Square, London EC4Y 8AP. The hearing may be followed virtually via the Tribunal’s website (a “Watch now” link to view the hearing will appear on the hearing date under the Diary list on the following pages: <https://www.catribunal.org.uk/> and <https://www.catribunal.org.uk/diary>).
- To learn more about Vicki Shotbolt CRL’s proposed claim, please visit www.steamyouoweus.co.uk or www.catribunal.org.uk.

YOUR LEGAL RIGHTS AND OPTIONS NOW	
OBJECT TO THE APPLICATION OR THE PROPOSED CLASS REPRESENTATIVE	Any person with an interest (including any Proposed Class Member) may object to the application for a CPO, or the authorisation of the proposed class representatives (Vicki Shotbolt CRL), by stating their reasons for objecting in writing to be received by the Tribunal by 25 July 2025 at 4pm . For further details, see Question 8 below.
APPLY TO MAKE ORAL / WRITTEN SUBMISSIONS TO THE TRIBUNAL	Any person with an interest (including any Proposed Class Member) may apply to the Tribunal for permission to make written and/or oral submissions at the hearing commencing on 14 October 2025. Any such application must be made in writing, supported by reasons, and received by the Tribunal by 25 July 2025 at 4pm .
CONTACT DETAILS	To learn more about the application to bring the claim, visit www.steamyouoweus.co.uk and/or www.catribunal.org.uk/cases/16407724-vicki-shotbolt-class-representative

GENERAL INFORMATION

1. Why has this notice been issued?

The Tribunal has issued directions for a hearing to determine whether Vicki Shotbolt CRL’s application for a CPO should be granted. The hearing is scheduled to commence on 14 October 2025. It has also directed that this notice be issued ahead of the hearing to seek the views of any interested persons.

Vicki Shotbolt CRL's application for a CPO asks the Tribunal to: (i) approve the claim as suitable to proceed as opt-out collective proceedings on behalf of eligible class members; and (ii) approve Vicki Shotbolt CRL to act as the class representative.

This notice has been issued to inform you of your right to object to the application for a CPO or the authorisation of Vicki Shotbolt CRL as the class representative. Please read this notice carefully. It explains what the claim is about, who is included, your right to object, and what action you need to take at this stage (if any).

2. What is the Competition Appeal Tribunal?

The Tribunal is a specialist court based in London that covers the whole of the UK and specialises in resolving competition law disputes, including proposed collective proceedings such as these. The Tribunal publishes its Rules and Guidance, together with information about what it does and details of its on-going cases, on its website www.catribunal.org.uk.

A summary of this claim against Valve can be found on the Tribunal's website at www.catribunal.org.uk/cases/16407724-vicki-shotbolt-class-representative

3. Who is the proposed collective proceedings against?

The proposed claim is against Valve, a corporation with its headquarters in Washington, USA. Valve initially operated as a PC games developer and publisher and launched Steam in 2003. Steam is a PC games distribution platform for selling PC games of third-party publishers as well as PC games developed by Valve.

4. What is Valve alleged to have done wrong? What are the proposed collective proceedings about?

Vicki Shotbolt CRL alleges that Valve's gaming platform Steam is likely to hold a dominant position and it has abused its allegedly dominant position by allegedly: (i) imposing price parity obligations that do not allow PC Games publishers and developers to sell their product elsewhere on better terms than on Steam; (ii) charging publishers excessive and unfair commission rates for distribution of PC games and Add-on Content; and (iii) restricting the ability of users to purchase Add-on Content for games purchased on Steam through other distribution channels. As a result, Vicki Shotbolt CRL alleges that the Proposed Class have been overcharged for the Relevant Purchases and are entitled to compensation. Valve denies any wrongdoing and does not accept that the Proposed Class has been overcharged.

5. Who is the Proposed Class Representative?

The application for a CPO requests that Vicki Shotbolt CRL be authorised to act as the class representative for the proposed claim.

Vicki Shotbolt CRL is a private company limited by guarantee incorporated in England (company number 15169580). The company was established for the specific purpose of bringing these proceedings. The sole director is Vicki Shotbolt, who is the CEO of Parent Zone, an organization that specialises in understanding the impact of technology on families and children. Ms Shotbolt has full control of the decisions and conduct of Vicki Shotbolt CRL.

As the class representative Vicki Shotbolt CRL would conduct the claim against Valve on behalf of all class members (except for those who decide to opt-out of the class). Vicki Shotbolt CRL

would instruct the lawyers and experts, make decisions on the conduct of the claim and consider and decide whether to present any offer of settlement that Valve may make to the Tribunal for its approval. The Tribunal will assess Vicki Shotbolt CRL's suitability to act as the class representative as part of the hearing on 14 October 2025.

During the collective proceedings, Vicki Shotbolt CRL would be responsible for communicating with and updating the class members on the conduct of the proceedings and for issuing formal notices, such as this notice. If approved, Vicki Shotbolt CRL would regularly update the class about the claim on the website www.steamyouoweus.co.uk and through the media.

WHAT DOES THE CPO APPLICATION ASK FOR?

6. Who would be in the Proposed Class?

The application for a CPO asks the Tribunal to allow the proposed collective proceedings to proceed on an "opt-out" basis on behalf of a class of individuals who made the Relevant Purchases.

As a result, the Proposed Class Members who have suffered loss do not need to bring individual claims to obtain compensation for their loss. Instead, such individuals may all receive compensation through a single, collective claim brought on their behalf by a proposed class representative.

The proposed class consists of all Persons who during the Class Period, made one or more payments for the purpose of purchasing: (a) PC Games; and/or (b) Add-on Content for PC Games, including subscription payments for PC Games and/or Add-on Content (collectively "**Relevant Purchases**"). For the purposes of this definition of the Proposed Class (the "**Class Definition**"):

- (a) "**Persons**" means, in respect of Relevant Purchases, the person who was licensed to use the acquired content, typically the account holder.
- (b) "**Class Period**" means the period up to the date of the Collective Proceedings Order in these proceedings: (i) from 3 June 2018, in relation to members of the Class domiciled in England, Wales and Northern Ireland; and (ii) from 1 January 2010 in relation to PCMs domiciled in Scotland.
- (c) "**PC Games**" means video games designed to be played on PCs (i.e. personal computers), as opposed to on other types of hardware such as consoles or mobiles, including PCs built by Apple and/or using a Mac operating system.
- (d) "**Add-on Content**" means content that can be added-on to PC Games that is purchased after the initial acquisition of the game, sometimes referred to as Downloadable Content ("**DLC**"), and includes content acquired through Microtransactions completed during gameplay.

All Persons who fall within the definition of the Proposed Class and, on a date of domicile to be determined by the Tribunal, are:

- (a) domiciled in the UK, are proposed to be included in the Proposed Class; and
- (b) not domiciled in the UK, are proposed to be permitted to opt-in to the proceedings.

In respect of any person who meets the Class Definition but has subsequently died, the Class is proposed to include their lawful representatives, successors or assignees.

As a result of the definition of “Persons” within the Class Definition, the PCM will be the account holder to whom use of the acquired content was licensed. As a result, where a minor instigated Relevant Purchases while using the account of a parent or guardian, the PCM will be the parent or guardian. Where, however, a minor made Relevant Purchases while using their own account, the PCM will be the account holder notwithstanding that they may have been a minor at the relevant time. That is the case even if the minor made the Relevant Purchases using money or a bank/credit card provided to them by a parent or guardian, as in that scenario the common law presumption of advancement would result in a presumption that the relevant monies used and content acquired were a gift to the minor.

This is an opt-out claim. “Opt-out” means that anyone who meets the Class Definition will be included in the claim automatically unless they expressly ask to ‘opt-out’.

Further details regarding the requirements for eligibility as class members (and any applicable exclusions from the class, which includes any members of Vicki Shotbolt CRL, Valve’s legal teams and anyone assigned to determine the claim) can be found on the websites set up by Vicki Shotbolt CRL at www.steamyouoweus.co.uk.

Since this is an opt-out claim, the proposed class are not required to do anything for the time being. If the claim results in a distribution to class members, it will be necessary for class members to identify themselves to the class representative and register their claim to a share of the damages.

Proposed Class Members and other interested parties may register their interest on www.steamyouoweus.co.uk, to receive regular updates regarding the progress of this claim.

7. How much money does the claim ask for?

The claim seeks compensation for all those within the Proposed Class who may have been affected by Valve’s alleged breach of competition law. The total aggregate amount sought is currently estimated to be at least GBP £328 to £656 million (including interest). If the claim is successful, all persons who fall within the Proposed Class and have not opted out will be entitled to seek payment of their share of the damages awarded.

Visit www.steamyouoweus.co.uk for more details about the amount of compensation that you may receive in due course.

HOW TO OBJECT TO THE COLLECTIVE PROCEEDINGS ORDER APPLICATION OR TO THE CLASS REPRESENTATIVE

8. Who can object and what can I object to?

Any person with an interest (including any Proposed Class Member) may object to the application for a CPO or the authorisation of Vicki Shotbolt CRL as the class representative.

If you wish to file an objection, you must write to the Tribunal stating your reasons for objecting and send it **by email** to registry@catribunal.org.uk or **by post** to The Registrar, Competition

Appeal Tribunal, Salisbury Square House, 8 Salisbury Square, London EC4Y 8AP, so it is received **no later than 25 July 2025 at 4pm**,

When writing to the Tribunal you must include the following reference: ‘Vicki Shotbolt Class Representative Limited v Valve Corporation, Case No. 1640/7/24’.

Any person with an interest (including any proposed class member) can also apply to the Tribunal for permission to make written and/or oral submissions at the hearing of the application for a CPO commencing on 14 October 2025. Any such application must be made in writing, supported by reasons, and sent **by post** to the above address or **by email** to registry@catribunal.org.uk **so it is received no later than 25 July 2025 at 4pm**.

GETTING MORE INFORMATION

9. How can I stay updated on the progress of the claim?

You can visit www.steamyouoweus.co.uk for periodic updates and to register your interest. For further information, please visit the FAQs section on the website.

10. Who is funding the claim?

In order to fund the claim, Vicki Shotbolt CRL has entered into a litigation funding agreement with Bench Walk Guernsey PCC Limited contracting on behalf of the Steam UK Funding Cell (“**Bench Walk**”), a non-confidential copy of which is available to Proposed Class Members upon request through www.steamyouoweus.co.uk. This is common where the class representatives are not able to fund a claim of this size and public importance on their own. Additionally, Vicki Shotbolt CRL has secured insurance cover in order to protect against the risk of having to pay Valve’s costs if the claim is not successful, up to a limit of £ 15 million.

Proposed Class Members do not have to pay anything to be involved in the claim. Even if the claim is unsuccessful Proposed Class Members will not need to pay anything to Valve and will not be liable for its costs. More information can be found on the claim website: www.steamyouoweus.co.uk.