



e-Management N.V.
MAY 18 2026

Player Complaints Policy

Entity: Eastpoint Operations N.V.

Version: Revised (Compliance Update)

Purpose: This document incorporates mandatory remediation actions identified in the compliance review and aligns with Curaçao GCB/CGA regulatory requirements, AML/CFT obligations, and Responsible Gaming framework.

1. Purpose

This policy forms part of the Company's overall compliance framework and supports AML/CFT obligations, Responsible Gaming requirements, and regulatory reporting obligations.

2. Scope

This policy applies to:

- All player complaints
 - All employees and departments
 - Third-party service providers (payment providers, platform providers, outsourced services)
-

3. Complaint Classification

Complaints shall be classified as:

- **Standard:** General service issues
- **High-Risk:** Financial disputes or repeated complaints
- **Regulatory:** AML, fraud, data breach, or Responsible Gaming related

Classification determines escalation, SLA, and reporting obligations.

4. Complaint Submission & Logging

4.1 Submission Requirements

Complaints must include:

- Player ID
- Description of issue
- Date of incident
- Supporting evidence

Incomplete complaints are rejected until sufficient information is provided.

4.2 System Logging

All complaints must be recorded in a centralized complaint management system with:

- Status tracking
 - SLA tracking
 - Full audit trail
-

5. Complaint Handling Process

5.1 Acknowledgment

- **Owner:** Customer Support
- Acknowledgment sent within 24 hours
- Logged in system

5.2 Initial Assessment

- **Owner:** Customer Support
- **Reviewer:** Compliance (for high-risk/regulatory cases)
- Complaint categorized and risk assessed

5.3 Investigation Process

1. Assign complaint to responsible department
2. Collect data (account activity, transactions, logs)
3. Review evidence
4. Document findings
5. Escalate if required

Complaints involving AML indicators, fraud, or Responsible Gaming risks must be escalated to the Compliance Officer.

5.4 Resolution & SLA

- All complaints tracked against defined SLAs
- Overdue complaints automatically escalated to management

5.5 Communication

- All communication with players must be recorded in the system
-

6. Escalation Procedures

6.1 Internal Escalation

- Compliance Officer performs independent review of escalated complaints

6.2 External Escalation (ADR)

- Approved ADR body must be defined
 - Escalation criteria documented and applied
-

7. Regulatory Reporting

7.1 GCB Reporting

Material complaints (fraud, AML, data breach, systemic issues) must be reported to the Curaçao Gaming Control Board (GCB) within 24 hours.

7.2 AML / STR Reporting

Where suspicious activity is identified:

- Case must be assessed for Suspicious Transaction Reporting (STR)
 - Reporting made to FIU Curaçao where required
-

8. Recordkeeping

- **Owner:** Compliance Department
 - Complaints register maintained in secure centralized system
 - Records must be audit-ready and available for inspection
-

9. Fairness & Transparency

- Complaint handling consistency reviewed via periodic internal audits
 - Outcomes must be justified and documented
-

10. Data Protection

Complaint data must be handled in accordance with the Company's Information Security Policy.

11. Training & Awareness

11.1 Frequency

- Annual training mandatory

11.2 Scope

Training includes:

- Complaint handling procedures
- AML risk indicators
- Fraud detection
- Responsible Gaming concerns

Training completion must be recorded.

12. Monitoring & Continuous Improvement

- Compliance conducts periodic complaint trend analysis
 - Reports provided to management
 - Issues tracked in remediation register with owners and deadlines
-

13. Policy Ownership & Review

- **Owner:** Compliance Officer
 - Policy reviewed at least annually
-

14. Contact Information

- Complaint contact channels must be accurate and actively monitored
- Aligned with operational systems
- Players may submit complaints via:

Email: support@bigwin.com

Support Portal: <https://bigwin.com/fi/lobby>

15. SLA Framework

Defined timelines:

- Acknowledgment: ≤24 hours
 - Investigation start: ≤48 hours
 - Resolution: Defined per complaint type
 - Escalation: Immediate for high-risk/regulatory cases
-

16. System Requirements

The Company must maintain:

- Complaint management system
 - Audit trail capability
 - Logging of all actions
-

17. AML & Responsible Gaming Integration

Complaints must trigger:

- AML escalation where applicable
 - Responsible Gaming intervention where required
 - STR assessment when suspicious activity is identified
-

18. Final Compliance Statement

This policy is:

- Fully operationalized
- Audit-ready
- System-supported

Aligned with:

- GCB regulatory requirements
 - AML/CFT framework
 - Responsible Gaming obligations
-