



### ***Players Complaints Policy***

#### **Registered Address:**

Media Entertainment N.V.  
Emancipatie Boulevard 29 New Haven e-Zone, Curacao

#### **Document Revision History**

**Author: Petar Mitkovski**

| Version | Issue Date                 | Key Revisions                                   |
|---------|----------------------------|-------------------------------------------------|
| 1.0     | 16 <sup>th</sup> May 2025  | Initial Version Release                         |
| 1.1     | 01 <sup>st</sup> July 2025 | Update: Re: Player Complaints Policy Guidelines |

## Table of Contents

|                                                             |          |
|-------------------------------------------------------------|----------|
| <b>1. Policy Overview.....</b>                              | <b>3</b> |
| <b>2. Definitions.....</b>                                  | <b>3</b> |
| <b>3. Complaint Submission Process .....</b>                | <b>4</b> |
| <b>3.1 Escalation Steps.....</b>                            | <b>4</b> |
| <b>4. Alternative Dispute Resolution (ADR).....</b>         | <b>5</b> |
| <b>5. Complaint(s) Resolution Process .....</b>             | <b>6</b> |
| <b>6. Role of the Curacao Gaming Authority (CGA).....</b>   | <b>7</b> |
| <b>7. Complaint Resolution, Response and Feedback .....</b> | <b>7</b> |
| <b>8. Artificial Intelligence (AI) .....</b>                | <b>8</b> |
| <b>9. Record-Keeping and Reporting .....</b>                | <b>8</b> |
| <b>10. Reasons for Complaint .....</b>                      | <b>8</b> |



## 1. Policy Overview

This Complaints Policy outlines the framework for managing player complaints and disputes, in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK") and the guidance of the Curaçao Gaming Authority (CGA). Media Entertainment N.V. is fully committed to transparency, fairness, and timely resolution of complaints.

The Media Entertainment's Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

This policy is clearly stated, visible and added to the website(s) operated and licensed by Media Entertainment N.V.

The Complaints Policy "the policy" has been published as a "standalone" document with forwarding link(s) from the website homepage and/or registration page.

Media Entertainment N.V. may require players to confirm acceptance of this Complaints Policy during registration, for example via a tick box or popup, in accordance with applicable laws.

Media Entertainment N.V. (we, the company, Licensee), include acceptance of the Complaints policy as part of the registration process.

This Complaints Policy is based on regulatory requirements under the National Ordinance on Games of Chance. This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under legislation. The Complaints Policy of Media Entertainment N.V. guarantees players access to a straightforward and effective dispute resolution (ADR) process, including free alternative dispute resolution (ADR) services for the end users/players/registrants that prioritize quality and independence. Offside Gaming aim is to ensure that all customers always have a great experience when using our services. However, we recognise there are occasions where we may not have been able to meet your/their expectations, and in doing so, we want to hear from you as soon as possible so we may resolve your concern quickly and fairly.

Our customer service team is highly trained to resolve any queries in order to provide a satisfactory outcome. On the rare occasions where this is not possible, you can request for your complaint to be escalated to a senior team member, who will independently review and seek resolution to your complaint

In accordance with Article 5.3 of the LOK, further rules, policies, and guidelines regarding complaints and ADR processes may be established. Execution of this Complaints policy is the responsibility of the operators Compliance Role representative.

## 2. Definitions

**Player Interaction:** Any written communication initiated by a player and directed to the operator's customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification, questions etc. no matter method channel used by player.



**Complaint:** A Complaint is a written expression of dissatisfaction by a player relating to the operator's services, decisions, terms, or conduct, which indicates the player is unhappy, not satisfied and expects a response or resolution.

**Dispute:** A complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organisation or to an independent third party and or ADR or Court of Laws, Police or any other.

### **3. Complaint Submission Process**

This Complaints Policy applies to all players whom has accounts with Media Entertainment N.V. and has been clicked on the tick box accepted the Complaints Policy. Our Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint. In the case of or anti post fixed odds betting the six-month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager.

**Note:** In the case of complaints about in-running sports betting, customers must be advised that while they may submit a complaint within six months, prompt action may be necessary if the investigation may depend on data specific to the complaint which — due to the nature of in running betting — may no longer be available after a short period, in so far as the Media Entertainment N.V. cannot reasonably be expected to preserve such data any longer and could not assist with.

#### **3.1 Escalation Steps**

Complaints can only be made by the registered player and customer of Media Entertainment N.V. at the website(s). Note that any player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against Media Entertainment N.V.

The Licensee offer customer support via email and/or live chat.

An official Complaint Submission Form is available to the player. The form is downloadable on the website(s) and can be emailed by the player on his behalf via email. The Complaint Submission Form is available in English and in the language of the website used by the player.

The form includes at a minimum the following sections:

- Complainant's names;
- Address, place of residence;
- Complaint's/player/user account details;
- Date of the complaint and dispute event;
- Detailed maximum fully description of complaint/case/issue;
- Any supportive documents, proofs, screenshots etc., as evidence of the player's statement;

The form is available in English and or in the language of the website/domain(s) that the player is using on his own. Media Entertainment N.V. – Licensee reserve the right to request, any other or supporting documentation from the player in additional as part of the complaint. Any additional documentation, information, requested by the Operator will be reasonable in the context and figure for complaint resolution and understands.



Media Entertainment N.V. provide an Additional Dispute Resolution (ADR) option for any player/complainant subject on complaint and case.. Players have access to ADR services free of charge. Media Entertainment N.V. does not restrict players from pursuing legal action if they choose to do so.

In case the Player/User/Complainant do not agree with the decision, response, and very same feels unsatisfied, unhappy, player/user/complainant could escalate the matter to ADR – provider for free of charge. There are no tax/fees whatsoever payment for avoidance of a doubt for the Complainant's.

#### **4. Alternative Dispute Resolution (ADR)**

Contact information for ADR: **CADRE** (Curacao Alternative Dispute Resolution Entity)

Website: <https://cadre.online/>

Address: 39 Scharlooweg, Willemstad, Curaçao

In order to file a claim/complaint(s) please visit ADR – CADRE website - <https://cadre.online/file-a-claim-international/> or you could contact the team directly via contact form.

**For avoidance of doubt, Media Entertainment N.V. will bear all costs of the ADR process of complaints.**

Once ADR process is completed it cannot be recommenced by either the player or the operator with another different ADR entity. The completed process considers as binding closed and finished. In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future and it is closed for same case of complaint.

Provision of ADR services is mandatory. Media Entertainment N.V. reserves the right to set minimum thresholds for ADR escalation in low-value claims, where appropriate. Minimum amount of interest for complaint(s) to prevent abuse for minimum court claim should be higher than 5000 (five thousand) EUR or equivalent amount in the currency of the player/complainant(s) case, which has been played in the website(s).

The following categories of complaints are always eligible for ADR escalation, regardless of the monetary value involved:

- Responsible Gaming issues
- Account closures or restrictions
- Alleged unfair treatment
- Game fairness or technical errors
- Regulatory compliance concerns
- Data Protection or KYC/Verification concerns
- Any other matter that may indicate a systemic or regulatory issue

Each case is assessed on its individual merits. Media Entertainment N.V. reserves the right to refer any low-value claim to ADR at its discretion, even if the 5000 EUR threshold would otherwise apply.



Once a complaint has been reviewed and concluded by the ADR provider, it cannot be reopened with a different ADR entity. If the player voluntarily exits the ADR process before its conclusion, the dispute will be considered closed and cannot be raised again on the same grounds.

## 5. Complaint(s) Resolution Process

Complaints have been differentiated to two types of complaint(s) – related to responsible gaming that could be (responsible gaming, self-exclusions, vulnerability and vulnerable matter, cooling-off matters, etc. related straight to responsible gambling) and complaints – all other matters complaints.

The **responsible gaming complaint(s)** will be prioritized due to potential impacts on player well-being.

Responsible matter complaints - Players may open/start/initiate a complaint for free of charge within period of **six (6)** months of the incident related to their participation in a game of chance and or in the case of post fixed odds betting the six-month clock begins after resolution of event rather than the placement of wager. “Complaints – due to responsible gaming” – Those complaints related to responsible (problematic) gambling will be prioritized due to potential impacts and complications on player/user/individual well-being and standard of life. Media Entertainment N.V. is following a Responsible Gambling Policy and laws applicable to prevent and follow the rules with regards to wide impact of gaming activities and such actions and games over the personal individuals and mentality of players. Media Entertainment N.V. is committed to handling every complaint with professionalism, care, and efficiency. Each case is reviewed on its individual merits, and we aim to resolve issues in a fair and timely manner. In some cases, additional time may be required to gather information, consult third-party service providers, or investigate technical issues. We appreciate our players’ understanding in such situations and will keep them informed throughout the process.

Players must provide a clear explanation of their complaint, supported by relevant information and evidence, which can be submitted via email, live chat, or our online complaint form, please refer to paragraph 3.1 and 3.2 from this policy.

Media Entertainment N.V. within **2 (two)** business days of receiving a complaint, will:

- Confirm receipt of the complaint in writing to its author/complainant.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.
- If more time is needed by our team to make a reasonable and informed decision, players will be informed of the delay, which will not exceed **2 (two)** weeks straight of receiving the complaint(s). In case of delay on behalf of player/complainant’s due to lack or slow or any kind of player/complainant’s assistance and further support, the resolution period may exceed by additional **2 (two)** weeks, but not more than that.



Media Entertainment N.V. will use its best effort, professionalism, and manner to resolve the responsible gaming matter of complaint(s) and case(s) by each with proper effort to details and urgency matter within 5 (five) business days from the date of receipt the complaint(s).

**All other matters complaints** Media Entertainment N.V. will assess and respond to complaints within maximum of **4 (four)** weeks. If necessary, due to complexity or lack of information, responses, support on behalf of complainant/player, this period may be extended once by an additional 4 (four) weeks, with prior written notice to the player, as following this policy steps.

Within 1 (one) week of receiving a complaint, the operator will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

## **6. Role of the Curacao Gaming Authority (CGA)**

The CGA is Authority – Licensor in Curacao and the CGA will not resolve and or make any decision on any complaints regarding gambling – related transactions, matters etc., on the Media Entertainment N.V. website(s). The CGA is not a judgement Court either or a Commission for private laws and data protection body.

Only inadequately handled cases - complaints, the decisions made by the operator and/or ADR, provider will be reviewing and/or overturning by the CGA as subjects matter. Notwithstanding of the above the Media Entertainment N.V. is not restricting the player's ability to contact the CGA directly regarding matters including but not limited to malpractice, breach of license conditions or whistleblowing matter, also decision for initiating a civil or any kind of law suit whatsoever. CGA does not mediate in individual disputes it will use the information to support its supervisory and enforcement actions as Licensor and Authority body ad hoc.

## **7. Complaint Resolution, Response and Feedback**

A player will always receive a final determination of their complaint in writing. The response will be either:

- A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
- Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the operator must have requested this information within the initial four-week period. Should the complainant not provide the necessary information within that period, the operator may reject the complaint.



If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to an independent ADR entity.

## **8. Artificial Intelligence (AI)**

**8.1** The use of AI is permissible under this Complaints Policy Guideline subject to the following terms: Once a player complaint has been identified as pertaining to Responsible Gaming - (Clause 4.1), communications with the player should be conducted by a human, not AI as always. Complaints that can be reasonably considered as complex should be dealt with by a human, not AI. The AI records must be monitored to ensure that they are reasonable in their solutions/recommendations and consistent across players with like-for-like complaints. AI will be used in cases and complaint(s) with matter of simplicity and automatically answers, responses, support and help.

## **9. Record-Keeping and Reporting**

Media Entertainment N.V. will: submit reports to the CGA each year not later than January 15th and June 15th based on complaints submitted to the operator since the previous reporting period by players using the Complaints Submission Form. The Company will keep records for period of 5 years from date of final binding of each complaint(s).

## **10. Reasons for Complaint**

The player has the right to make a complaint regarding any part of their relationship with the Media Entertainment N.V. or any incident related to their participation in a game of chance. This includes (but is not limited to):

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
7. Treatment of player balances
8. KYC and Verification
9. Data Protection
10. Technical or Software issues
11. AML concerns
12. Issues with minors
13. Fraudulent games
14. Fraudulent practices
15. License or regulation
16. Unfair terms and conditions