

COMPLAINT HANDLING POLICY

Version 1.1.

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1. GENERAL

MEDIAL N.V. (herein “the **Company**”) maintains effective and transparent procedures for the reasonable and prompt handling of concerns and/or queries and/or issues and/or complaints received from players and keeps a record of each complaint or concern and the measures taken for its resolution.

The Company’s aim is to provide a high level of service to all of its players at all times. The Company appreciates that from time-to-time things can go wrong or there can be misunderstandings, however the Company is committed to deal with concerns and complaints positively and supportively in line with Curacao Gaming Authority (the “**CGA**”) complaints handling guidelines and legislative requirements.

2. DEFINITIONS

For the purposes of this Complaints Policy:

“CGA” means the Curaçao Gaming Authority.

“Complaint” means a written expression of dissatisfaction by a player regarding the Company’s services, decisions, terms, or conduct, where the player reasonably expects a response or resolution. For reporting purposes, a Complaint is counted when a Complaint Submission Form is submitted or the matter is escalated to ADR.

“Complaint Reference” means the unique number assigned to each Complaint for tracking purposes.

“Player Interaction” means any written communication between the player and the Company regarding services or activity on the player’s account.

“Dispute” means a Complaint concerning a gambling transaction or its management that remains unresolved after the Company’s internal complaint-handling procedure.

“ADR” means Alternative Dispute Resolution provided by an independent and CGA-certified third-party entity.

“Customer” means any individual who holds or has applied to hold an account with the Company.

“External Resolution” means the escalation of a Complaint to the ADR provider once the Company has issued its final determination.

3. CONCERNS/QUERIES

If you are dissatisfied with the service provided by the Company, or if you have a query or concern regarding your account or activity with the Company, please contact our Customer Support as soon as possible at support@medialnv.com.

Players’ concerns are initially handled by the Customer Support Department which determines whether the concern can be resolved immediately or if it requires further investigation. The Company will carry out an impartial review of the issue with a view to understanding what did or did not happen and assess whether the Company has acted fairly within its rights and has met its contractual and other obligations.

The Customer Support Department should make its best efforts to ensure that in case the concern/query is being of such nature that it can be resolved immediately (within 5 business days), to do so that the player will be satisfied and will not have to pursue the completion of a formal complaint.

If the player is not satisfied with the response to the concern received, then the player may raise this further with the Compliance Department following the process indicated in the Section 3 below.

4. COMPLAINT SUBMISSION PROCESS

3.1. GENERAL INFORMATION

- 3.1.1. A complaint will be recorded as an official written complaint by the Company and will be handled as such only if it is duly submitted with all the required information as described below.
- 3.1.2. Without prejudice to the generality of the above, the Company shall treat each case separately on a case-by-case basis and categorize the matter as complaint as long as adequate particulars of conduct being alleged against the Company can be identified.
- 3.1.3. Players can 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.
- 3.1.4. The Curaçao Gaming Authority (CGA) does not intervene in individual disputes between players and operators. However, players may report suspected regulatory breaches or malpractice directly to the CGA. The CGA may use such information for supervisory or enforcement purposes but will not review or overturn the outcome of a complaint or ADR decision unless clear evidence of mishandling exists.

3.2. SUBMISSION OF COMPLAINT

- 3.2.1. In the first instance, players should contact the Company's Customer Support team via email or live chat.
- 3.2.2. If the matter cannot be resolved informally, the players willing to submit a complaint are advised to complete the formal Complaint Submission Form (see Annex) and sent it to the Company via email to complaints@medialnv.com. The Complaint Submission Form is available in English and the primary language of the Company's website.
- 3.2.3. Only the registered account holder may submit a Complaint. In accordance with Article 1.3(c) of the LOK, the rights arising from a Complaint may not be transferred to or exercised by any third party.
- 3.2.4. The Complaint Submission Form must include at a minimum:
 - a) Player's full name and residential address
 - b) Account number or username
 - c) Date of the Complaint
 - d) Date of the incident being disputed
 - e) Complaint category selected from predefined options
 - f) A description of the issue
 - g) Any supporting documentation
 - h) A declaration confirming that the information provided is accurate
- 3.2.5. Upon receiving the complaint, the Company must register the complaint directly to an internal register, giving it a unique reference number.

- 3.2.6. Complaints related to responsible gambling will be prioritized due to potential impacts on players' wellbeing. The Company, within 2 days of receiving the official Complaint Submission Form, will confirm receipt of such to the player will share the unique reference number of his complaint to use for all future contact with the Company, will provide an explanation of how the complaint will be processed and provide notice of the average timeline for resolution.
- 3.2.7. The Company will do best in efforts to resolve these cases within 5 business days of receiving the complaint. If more time is needed to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed the 2 weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further 2 weeks.
- 3.2.8. Regarding all other types of complaints, the Company will assess and respond within 4 weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional 4 weeks with prior written notice to the player.
- 3.2.9. The Company within one week of receiving the official Complaint Submission Form will confirm receipt of such to the player, will share the unique reference number of his complaint to use for all future contact with the Company, will provide an explanation of how the complaint will be processed and provide notice of the average timeline for resolution.
- 3.2.10. If a Complaint concerns the outcome of a gambling transaction or account management issue, the Company will make the relevant transaction records available to the player. Such information will also be provided to a legitimate authority or court if required under applicable law.
- 3.2.11. A player will always receive a final determination of their complaint in writing within the timeframes specified above.
- 3.2.12. The response will be either:
 - a) A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
 - b) Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the Company will request this information within the initial 4 weeks' time period. Should the complainant not provide the necessary information within that time period, the Company may reject the complaint.
- 3.2.13. If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player can escalate the matter to an independent Alternative Dispute Resolution entity as detailed in Section 4 below.

4. ALTERNATIVE DISPUTE RESOLUTION

If the Player remains dissatisfied with the final response of the Company or in case of no final response within the specified timeframe, the Player is entitled to take his complaint to the Alternative Dispute Resolution (the "**ADR**") entity, free of charge. For avoidance of doubt, the Company will bear all costs of the ADR process.

Once an ADR decision has been issued, neither the player nor the Company may refer the same Complaint to another ADR provider. If the player withdraws or ceases to participate in the ADR process after it has commenced, the Complaint will be considered closed.

Alternative Dispute Resolution Entity:	

5. RECORD KEEPING AND REPORTING

5.1. RECORD KEEPING

The Company shall maintain all complaints for a minimum period of seven years after the execution of the complaint and/or termination of the business relationship with the Player. The departments responsible are the Compliance Department and the Customer Support Department.

5.2. REPORTING

The Company must submit biannual complaints reports to the CGA. These reports include:

- a) Total number of Complaints received
- b) Number resolved (upheld or dismissed)
- c) Number pending or unresolved
- d) Categorisation of Complaints
- e) Complaints escalated to ADR
- f) Legal proceedings initiated by players

6. OTHER INFORMATION

The Curaçao Gaming Authority does not mediate individual monetary disputes. Players may, however, contact the CGA to report suspected regulatory breaches, integrity concerns, or malpractice.

7. ANNEX: COMPLAINT SUBMISSION FORM

Player Details

Full Name: _____
 Residential Address: _____
 City: _____ Country: _____
 Email Address (registered with operator): _____
 Account Number/Username (if applicable): _____

Complaint Details

Date of the Event Being Disputed: ___ / ___ / ____
 Date You First Contacted Support: ___ / ___ / ____
 Preferred Language for Communication: ☐ English ☐ [Other: _____]

Type of Complaint (please select all that apply):

- ☐ Deposit Issues
- ☐ Withdrawal Issues
- ☐ Bonus Terms and Conditions
- ☐ Account Closure or Restrictions
- ☐ Game Outcome Errors or Unfairness
- ☐ Responsible Gaming Concerns
- ☐ KYC/Verification Issues
- ☐ Access to Player Balances or Funds
- ☐ Data Protection or Privacy
- ☐ Technical or Software Issues
- ☐ Anti-Money Laundering Concerns
- ☐ Issues Involving Minors
- ☐ Alleged Fraud or Fraudulent Practices
- ☐ License or Regulatory Compliance
- ☐ Unfair Terms and Conditions
- ☐ Other (please describe): _____

Description of Complaint

Please provide a clear and concise description of the issue:

Resolution Sought

Please describe how you would like the issue to be resolved:

Consent and Acknowledgement

- ☐ I confirm that I am the registered player and the information provided in this form is accurate to the best of my knowledge.
- ☐ I understand that false or misleading complaints may result in account action and will not be processed.
- ☐ I understand that my complaint will be reviewed according to the Company's Complaints Policy, and may be escalated to an independent ADR provider if not resolved.

Signature: _____

Date: ___ / ___ / ____