
BETS ENTERTAINMENT N.V.

PLAYER COMPLAINTS POLICY

CONFIDENTIAL


(SMES)

Solutions for Management
and Employment Support N.V.

24.09.2025.

TABLE OF CONTENTS

<u>APPROVAL.....</u>	<u>3</u>
<u>DEFINITIONS AND INTERPRETATION.....</u>	<u>4</u>
<u>POLICY OVERVIEW.....</u>	<u>5</u>
<u>COMPLAINT SUBMISSION PROCESS.....</u>	<u>5</u>
ELIGIBILITY AND TIMEFRAME	5
ROLE OF THE CGA	5
STEPS IN THE COMPLAINT RESOLUTION PROCESS.....	5
<u>COMPLAINT RESOLUTION PROCESS</u>	<u>6</u>
RESPONSIBLE GAMING COMPLAINTS	6
OTHER COMPLAINT TYPES	6
FINAL DETERMINATION	6
USE OF ARTIFICIAL INTELLIGENCE (AI)	6
<u>ALTERNATIVE DISPUTE RESOLUTION</u>	<u>7</u>
<u>RECORD-KEEPING AND REPORTING</u>	<u>7</u>
REPORTING DUTIES	7
RECORD KEEPING.....	7
<u>REASONS FOR COMPLAINT</u>	<u>7</u>
<u>PLAYER COMPLAINT SUBMISSION FORM</u>	<u>9</u>

APPROVAL

Version	Version Date	Approved By: Solutions for Management and Employment Support N.V.	Approval
1.0	September 2025	Vivian Victoria Ersilia	

DEFINITIONS AND INTERPRETATION

“ADR”	Alternative Dispute Resolution;
“Business Day”	means, any day (other than Saturday or Sunday) on which ordinary banks are open for their full range of normal business
“CGA”	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, a complaint is counted when a Complaint Submission Form is submitted or the matter is escalated to ADR;
“Complaints Policy”	means the Company’s settlement of complaints policy, available within the company’s Terms and Conditions;
“Complaint Reference”	means a unique number assigned to a Complaint that will be used to track that Complaint;
“Customer”	means a player of the Company’s and includes potential players who are yet to deposit on the site;
“Disputes”	those complaints that are about the customer’s gambling transaction (including management of the transaction) and have not been resolved at the first stage of the Company’s complaints procedure. For example, disputes may include those linked to the application of bonus offers or to other terms and conditions, account management, or the ability to access funds and winnings.
“External Resolution”	means the referral of a Complaint to the ADR for resolution by a Customer if that Customer is not satisfied with the outcome of this Complaints Handling Procedure;
the “Company”	means Bets Entertainment N.V. (company number 155648, registered address Zuikertuintjeweg Z/N (Zuikertuin Tower) Willemstad, Curaçao) which is a holder of license number OGL/2024/1178/0479 from the Curaçao Gaming Authority.
“Recommendation”	Means the recommended resolution to a Complaint made by the staff member handling a Complaint.

POLICY OVERVIEW

This Player Complaints Policy establishes the procedures for handling complaints and disputes raised by players. It ensures a transparent, fair, and timely process, in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

The policy guarantees that all players have access to a clear and effective complaints and dispute resolution system, which includes the provision of independent and cost-free alternative dispute resolution (ADR) services.

While this policy is grounded in the requirements of the LOK, it does not override any applicable provisions of civil law, including but not limited to Book 6 of the Civil Code of Curaçao, which governs general Terms and Conditions.

COMPLAINT SUBMISSION PROCESS

ELIGIBILITY AND TIMEFRAME

All players are entitled to file a complaint at no cost within six months of the event or the settlement of the bet in question.

For peer-to-peer games (e.g., poker) or ante post fixed-odds betting, this six-month period begins from the date of bet settlement or conclusion of the relevant event. In cases involving in-running sports betting, players are advised to file complaints promptly, as specific data needed for review may become unavailable after a short time. The Company is not obligated to retain such data beyond what is reasonable.

ROLE OF THE CGA

The CGA does not intervene in individual disputes between players and operators. However, players may report suspected regulatory breaches to the CGA. The CGA may use such reports for supervision or enforcement actions but will not review or overturn operator or ADR decisions unless mishandling is evident.

STEPS IN THE COMPLAINT RESOLUTION PROCESS

- ⇒ Only the registered account holder may submit a complaint. Article 1.3(c) of the LOK prohibits transferring any claims against a licensed operator.
- ⇒ In the first instance, players must contact the Company's customer support via email or live chat.
- ⇒ An official Complaint Submission Form must be completed, including:
 - ⇒ Player's name and address
 - ⇒ Account number (if applicable)
 - ⇒ Dates of the complaint and the incident
 - ⇒ Description of the issue, using predefined categories
 - ⇒ The form must be available in English and the primary language of the website.
 - ⇒ The Company may reasonably request supporting documents relevant to the issue.
 - ⇒ Players will be offered the option to escalate their complaint to an ADR provider as described in Section 5.

COMPLAINT RESOLUTION PROCESS

RESPONSIBLE GAMING COMPLAINTS

Complaints involving responsible gaming are given high priority due to their potential impact on player well-being. These include cases involving vulnerable players, failures in applying self-exclusion, or delays in implementing cooling-off periods.

- ⇒ The Company will make every effort to resolve these within five business days.
- ⇒ Within two business days of receipt, the Company will:
- ⇒ Acknowledge the complaint in writing
- ⇒ Explain the steps of the resolution process
- ⇒ Provide estimated timelines for a final response

If additional time is required, the player must be informed. The delay may not exceed two weeks unless caused by a delay in the player's response, in which case an extension of up to two additional weeks is permitted.

OTHER COMPLAINT TYPES

Complaints unrelated to responsible gaming will be resolved within four weeks. In complex cases, this period may be extended once by up to four additional weeks with written notice to the player.

Within one week of receiving the complaint, the Company must:

- ⇒ Confirm receipt in writing
- ⇒ Explain how the complaint will be handled
- ⇒ Provide an expected resolution timeline

FINAL DETERMINATION

All complainants will receive a final written outcome. This may include:

1. A reasoned decision including any applicable evidence.
2. Justification for not proceeding with the complaint if it cannot be handled.
3. Guidance on how to escalate the complaint to an independent ADR provider if the player remains unsatisfied.

If a response requires additional information from the player, it must be requested within the initial four-week period. If the player fails to respond in time, the Company may close the complaint.

USE OF ARTIFICIAL INTELLIGENCE (AI)

AI may be used in complaint handling only under the following conditions:

- ⇒ Human representatives must handle complaints related to responsible gaming.
- ⇒ Complex or sensitive complaints must be reviewed by a human.
- ⇒ AI-generated recommendations must be regularly reviewed for fairness and consistency.

ALTERNATIVE DISPUTE RESOLUTION

The Company is committed to offering access to independent ADR services, as detailed in the Terms and Conditions.

- ⇒ If a complaint remains unresolved, players may escalate it to a certified ADR entity at no cost.
- ⇒ Once an ADR decision is made, neither party may refer the same complaint to another ADR provider.
- ⇒ If a player withdraws from the ADR process after it has begun, the complaint is considered closed and cannot be reopened.

RECORD-KEEPING AND REPORTING

REPORTING DUTIES

The Company must report to the CGA twice annually, on January 15 and June 15, beginning in January 2026. Reports must include:

- ⇒ Total complaints received
- ⇒ Number resolved (upheld or dismissed)
- ⇒ Number pending or unresolved
- ⇒ Categorization of complaints
- ⇒ Cases referred to ADR
- ⇒ Legal actions initiated by players.

RECORD KEEPING

Records of unresolved complaints and those escalated to ADR or court must be retained for up to five years or as otherwise required under applicable data protection and civil laws.

REASONS FOR COMPLAINT

Players may file complaints related to any interaction with the Company or gaming experience, including (but not limited to):

- ⇒ Deposit issues
- ⇒ Withdrawal issues
- ⇒ Bonus terms and conditions
- ⇒ Account closures or restrictions
- ⇒ Alleged errors or unfairness in game outcomes
- ⇒ Responsible gaming issues
- ⇒ Treatment of player balances
- ⇒ KYC and Verification

- ⇒ Data Protection
- ⇒ Technical or Software issues
- ⇒ AML concerns
- ⇒ Issues with minors
- ⇒ Fraudulent games
- ⇒ Fraudulent practices
- ⇒ License or regulation
- ⇒ Unfair terms and conditions

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PLAYER COMPLAINT SUBMISSION FORM

SECTION	DETAILS / OPTIONS
FULL NAME	_____
RESIDENTIAL ADDRESS	_____
CITY	_____
COUNTRY	_____
EMAIL ADDRESS (REGISTERED)	_____
ACCOUNT NUMBER / USERNAME	_____
DATE OF EVENT (DD/MM/YYYY)	___/___/___
DATE FIRST CONTACTED SUPPORT	___/___/___
PREFERRED LANGUAGE	☐ English ☐ Other: _____
TYPE OF COMPLAINT (TICK 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: _____
DESCRIPTION OF COMPLAINT	(Please describe clearly below; attach extra pages if needed)
SUPPORTING DOCUMENTATION	(Optional but Recommended - tick all that apply) ☐ Deposit confirmation ☐ Chat/email history with support ☐ Game result screenshots ☐ Bonus terms/screenshots ☐ Identity/KYC documents ☐ Other: _____
RESOLUTION SOUGHT	(Describe your desired resolution)
CONSENT AND ACKNOWLEDGEMENT	☐ I confirm that I am the registered player and that all information provided is accurate. ☐ I understand that false or misleading complaints may lead to account action or dismissal of this complaint.

SIGNATURE
DATE
SUBMISSION
INSTRUCTIONS

☐ I understand my complaint will be reviewed per the Company's Complaints Policy and may be escalated to an independent ADR if unresolved.

____/____/____
Please send this completed form to our Customer Support at: support@bets.io

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