

Quadgreen N.V.

Player Complaints Policy

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Purpose

This policy aims to ensure a fair, consistent, and efficient process for resolving customer complaints. The Company is committed to providing a fair and transparent gambling experience. This Complaints Policy outlines how customers can submit complaints, how these are handled, and the customer rights, including access to an Alternative Dispute Resolution (ADR). This policy applies to all customers of Quadgreen N.V. operating under the brands Springbok Casino and Spinworld Casino.

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1. Confidentiality

This document and its ideas are strictly confidential and may not be used in any manner other than its expressed purpose without the written permission.

2. Disclaimer

QUADGREEN N.V. referred to hereinafter as the 'Company' reserves the right to amend the policies, procedures, definitions or interpretations at its discretion. This document records the Company policy that is current at the time of writing.

3. Definitions

ADR:	Alternative dispute resolution ('ADR'), which is offered in accordance with the ADR policy as is to be issued by the CGA.
The Company:	Quadgreen N.V., a limited liability company duly organized under Curaçao law registered with the Chamber of Commerce and Industry in Curaçao under number #132313
Complaint:	a written expression of dissatisfaction by a player, relating to the Company's services decisions, terms or conducts, whereby the player expects a response or resolution.
Customers:	Players who have opened an account on the Company's website and have been accepted as customers.
Registered Player:	a Customer who has completed the registration process on the Company's platform or website, provided all required information, agreed to the terms and conditions, and whose account has been approved and activated.
Reportable Complaint:	when a Complaint Submission Form has been submitted by the Customer and/or a Complaint has been escalated to the ADR.

4. Policy Overview

It is a regulatory requirement for the Company under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK") and the Player Complaints Policy Guidelines version 1.1. of June 18th 2025, by the Curaçao Gaming Authority ("CGA").

This policy establishes internal controls and procedures that ensure that customers can access a complaints process and that it is effective. It demonstrates the requirements for alternative dispute resolution (ADR) services prioritising quality and independence.

5. Website Terms & Conditions

The Company shall provide a Customer Support service equipped with adequate resources to promptly and effectively respond to Customers through email, helpdesk chats and/or communication via telephone.

The complaints process is visible and accessible to customers on both the Springbok Casino and Spinworld Casino websites. A customer can find the details of this procedure in the respective website terms and conditions.

The terms and conditions include:

- 1) Customer rights to complain.
- 2) Links to contact the frontline team.
- 3) Information about how to contact the Company.
- 4) How a customer can submit a formal complaint.
- 5) Location of the Complaint Submission Form.
- 6) Timelines for responses and resolution.
- 7) Details about using Alternative Dispute Resolution (ADR)
 - including explicit right to Alternative Dispute Resolution (ADR) services
 - details of the ADR process, and customer rights.
 - Contact information for the ADR entity.
- 8) Information that ADR decisions may affect their right to pursue legal action.
- 9) Customer right to regulatory escalation.
 - Clear information that the CGA does not mediate disputes.
 - Customers have the right to report the Company if there is a breach of regulations.

6. Complaints Submission Process

The Company defines a complaint as any written expression of dissatisfaction related to its services, games, decisions, or conduct, where a response or resolution is expected.

A dispute is an unresolved complaint that may be escalated internally or externally (e.g. ADR or legal action). The complain shall be English.

6.1. Criteria of Complaint Submission

When a customer is not satisfied with a decision or other, the customer can submit a complaint when the following is applicable:

- Customers must have an active gambling account with the Company;
- The Complaint occurred within six (6) months of the issue or bet settlement;
- If the Complaint is initiated after this date, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.

All Complaints regarding sports betting should be submitted as soon as possible. Due to the nature of the bet, delays may result in the unavailability of relevant data. Although the Customer may lodge a Complaint within six (6) months from the date of bet settlement, it is advised to take prompt action. The investigation regarding the Complaint may depend on the available data and the Company can't guarantee that all data is still available at that time.

6.2. The Process

Customers can informally communicate a complaint to the Company's frontline teams using one of the communication methods available:

- Via Email
 - To Springbok: help@springbokcasino.co.za
 - To Spinworld: support@spinworldcasino.com
- Live Chat

The frontline teams will make every effort to resolve the dispute. Complaints submitted via email or live chat is not considered formal unless followed by submission of the official form.

Therefore, if the customer is still not satisfied, a formal complaint may be submitted by doing the following:

- 1) Must complete and submit the official Complaint Submission Form:
 - To Springbok: complaints@springbokcasino.co.za
 - To Spinworld: complaints@spinworldcasino.co.za

6.3. Complaint Submission Form

The Complaint Submission Form is required to ensure the Company receives all relevant details to investigate a case effectively.

The customer must submit the following information:

- Full Name
- Registered Email Address
- Residential Address
- Account Number / Username

- Date of Complaint
- Date of Incident (if different)
- Description of Complaint
- URL in question
- Amount in dispute

The customer provides confirmation to acknowledge that the information provided is accurate and that they are the registered account owner. The customer will receive an acknowledgement once the complaint has been successfully submitted. Customers should ensure that they submit the Complaint Submission Form available on the website of the brand (Springbok Casino or Spinworld Casino) with which their issue occurred.

7. Complaints Resolution

The Company processes complaints manually; the Complaints Team receive and evaluates all formal complaints submitted via the Complaint's Submission Form.

The Company does not use artificial intelligence (AI) to assess or respond to complaints. If an AI system is introduced the following will be considered:

- A human representative will handle all responsible gaming-related and complex complaints.
- All AI-generated responses will be reviewed regularly for fairness and consistency.
- Customers will be informed when a response is generated by AI.

Upon receiving this Complaint Submission Form, the Complaint becomes a Reportable Complaint. Depending on the nature of the Reportable Complaint, the designated customer support team member shall respond to the Customer.

The Company will provide the customer support function through a system designed to manage the support tickets, complaints, feedback and suggestions submitted by Customers. Initially, all customer support will be done through email, helpdesk chats and/or communication via telephone.

7.1. Complaints Resolution Timelines

Complaints resolution timelines vary based on the nature of the complaint. Complaints are prioritized based on the likely impact on the customer's well-being.

Catergory	Acknowledge	Resolution Time
Responsible Gaming Complaint	Within 2 business days	Within 5 business days (extends to two weeks with notice and up to four weeks in case of slow response by the player)
All Other Complaints	Within 1 week	Within 4 weeks (may extend once up to 4 weeks with notice)

If the Company requires more information, it will be requested within the timeframe above. A request for further details, with a response deadline, will be sent to the customer if there is no response to the first request. The complaint will be rejected if the customer does not provide the necessary information within the specified period.

7.2. Final Decision

When the evaluation of the complaint is completed by the Complaints Team, the final decision is communicated to the customer in writing.

This communication will include the following:

The Customer will receive a final conclusion of their Reportable Complaint, which can entail:

- A final assessment of the outcome/resolution of the Reportable Complaint;
- Detailed reasons for not handling the Reportable Complaint.

In case the Customer is not satisfied with the resolution and makes a further Complaint to that effect, the Customer can escalate the matter to an independent ADR entity. Once the Customer informs the Company about the desire to escalate the matter to the ADR, the Company will provide the details of the ADR.

8. Alternative Dispute Resolution (ADR)

To comply with the license conditions as mandated by LOK, the Company offers customers with complaints an independent and free ADR service. This referral becomes applicable when a customer remains dissatisfied with the final resolution. The Company absorbs the cost of the customer referral to an ADR.

The ADR provider is a Curaçao Gaming Authority (CGA) Certified ADR entity. A customer must first exhaust the complaint procedure before ADR

The Company will appoint a Certified ADR entity approved by the CGA and provide the related agreement within one month of the publication of the Certified ADR Providers on the official CGA's website.

Once a complaint is escalated and has been reviewed by the ADR entity and concluded, the customer or the Company will not engage a different ADR provider with the same complaint.

If a customer withdraws from the ADR process once it has started, the case is considered closed and will not be reopened.

Customer will be informed that ADR decisions may affect their right to pursue legal action. The Company will advise customers to consult the ADR terms and conditions for more information.

To prevent misuse of ADR, the Company has set, in accordance with the relevant legislation, the following parameter/s:

A decision of an ADR entity is binding on both the Company and the Customer who submitted the Reportable Complaint. The Customer can only bring Reportable Complaints to an ADR if:

- the value of the Reportable Complaint is more than EUR 5.000; or
- if the Reportable Complaint pertains to a Responsible Gaming complaint.

More specific details of the ADR procedure will be provided as soon as the CGA has published their ADR policy.

The ADR procedure does not eliminate the possibility for Customers to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure

9. Curaçao Gaming Authority (CGA)

The CGA will not resolve or make decisions on any player complaints nor will act as an ADR/escalation entity as it does not mediate in individual disputes.

CGA can be contacted by the Customer with regards of matters such as malpractice, breach of license conditions or whistle blowing.

Contact information for the CGA is made available to customer on demand and via the Company website.

10. Complaint Record Keeping

Records of unresolved Complaints and/or Complaints that have been escalated to ADR or legal proceedings will be kept for five (5) year or the relevant time stipulated by data protection, statute of limitations or other relevant laws.

11. Complaints Report – CGA

In accordance with CGA requirements, the Company will submit biannual reports to the CGA summarizing:

- The total number of complaints received.
- Total number of complaints resolved (upheld and rejected).
- Number of pending or unresolved complaints.
- Complaints by category.
- Number of complaints referred to ADR.
- Number and details of complaints resulting in legal proceedings.

These reports are submitted on **January 15th** and **June 15th** each year.

A summary of this policy may be published on the URL(s) of the Company.