

Agenics N.V.

Player Complaints Policy

Version 1.0 | July 2025

Document Control

Version	Effective Date	Approved By	Next Review Date	Comments	Signature
1.0.	July 25, 2025	Agenics N.V.	July 25, 2026	Initial Release	

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Table of Contents

1. Purpose	3
2. Terminology	3
3. Team Responsibilities.....	3
4. Complaint Submission Process	3
4.1. Eligibility.....	3
4.2. Submission Deadline.....	3
4.3. Categories of Complaints	3
5. Processing Timelines.....	4
5.1. Responsible Gaming-Related Complaints (Enhanced).....	4
5.2. Other Complaints (General)	4
6. Response and Resolution.....	5
7. Escalation and Dispute Resolution	5
7.1. Alternative Dispute Resolution (ADR)	5
7.2. Referrals to the Regulator	5
8. Documentation and Record Maintenance.....	5
9. Policy Accessibility and Player Acknowledgment.....	6

1. Purpose

This policy outlines the method through which players can file complaints related to the Company's services and how these are addressed and managed. The procedure complies with local regulatory obligations, including the Landsverordening op Kansspelen (LOK) and the Player Complaint Guidelines (v1.1 – June 18, 2025) as issued by the Curaçao Gaming Authority (CGA).

2. Terminology

- **ADR (Alternative Dispute Resolution):** External process to resolve disputes, as permitted by CGA guidelines.
- **The Company:** Refers to Agenics N.V., a legally registered limited liability entity operating under Curaçao jurisdiction.
- **Player:** Any individual holding a registered and verified gaming account on the Company's platform.
- **Registered Player:** A user who has completed the onboarding process, accepted the terms, and whose account is fully activated.
- **Complaint:** Any formal written expression of dissatisfaction related to the Company's service, policies, or outcomes.
- **Reportable Complaint:** Any issue officially filed using the Company's Complaint Submission Form or one that is escalated to ADR.

3. Team Responsibilities

The Customer Support Department is responsible for receiving, evaluating, and responding to all player inquiries and complaints, maintaining high service standards.

4. Complaint Submission Process

4.1. Eligibility

Only Registered Players may submit complaints. The Players may not sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the Company.

4.2. Submission Deadline

Players may lodge a complaint free of charge at any time up to six (6) months of the settlement of the bet or the incident about which they are making a complaint.

4.3. Categories of Complaints

- **Initial Handling:** Customer support addresses all first-line complaints via email or/and live chat.
- **Official Complaint Submission:** If unsatisfied, players may complete and submit online a Complaint Submission Form including:
 - Full name, contact information, and account details;
 - Dates of the incident and complaint;

- Description and nature of the issue;
- Disputed amount;
- Relevant website URL.

The form is available in English and in the language of the website that the player is using.

The Company may request supporting documentation the player requires to include as part of the complaint. Any additional information or documentation requested by the Company must be a reasonable in the context of complaint resolution.

5. Processing Timelines

5.1. Responsible Gaming-Related Complaints (Enhanced)

Includes issues like self-exclusion, gambling addiction, or cooldown periods:

- Acknowledgment: Within 2 business days the Company shall:
 - Confirm receipt of the complaint in writing;
 - Provide an explanation of the process by which the complaint will be handled;
 - Inform the player of the average expected resolution timeframe for such cases.
- Resolution Aim: Within 5 business days;
- Extended Response: If more time is needed by the Company to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two (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 two (2) weeks.

5.2. Other Complaints (General)

For general service, technical, or betting disputes:

- Acknowledgment: Within 7 days (1 week) the Company shall:
 - Confirm receipt of the complaint in writing;
 - Provide an explanation of the process by which the complaint will be handled;
 - Inform the player of the average expected resolution timeframe for such cases.
- Resolution Aim: Within 4 weeks;
- Extended Response: The Company will assess and respond to complaints within four (4) weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four (4) weeks, with prior written notice to the player.

6. Response and Resolution

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

- A reasoned final assessment of the outcome or resolution of the complaint, including supporting evidence where applicable or necessary;
- A detailed explanation for not handling the complaint. If additional information is reasonably required to fully address the complaint, the operator must have requested such information within the initial four (4) week period. If the complainant fails to provide the necessary information within that time, the operator may reject the complaint;
- Referral to ADR in case of dissatisfaction. If the player is not satisfied with the resolution and submits a further complaint on that basis, the player will be informed of their right to escalate the matter to an independent Alternative Dispute Resolution (ADR) entity.

7. Escalation and Dispute Resolution

7.1. Alternative Dispute Resolution (ADR)

If the customer is unsatisfied with the Company's final response:

- Details of an ADR service (approved by the CGA) will be provided;
- ADR decisions are binding;
- Eligibility:
 - Complaint value exceeds €5,000;
 - Complaint involves responsible gaming;
- The ADR process is cost-free, regardless of outcome. Customers must first exhaust the Company's internal process.

7.2. Referrals to the Regulator

The CGA does not resolve individual complaints but can be contacted for:

- Suspected breaches of license conditions;
- Malpractice or ethical concerns.

8. Documentation and Record Maintenance

The Company shall submit twice per year (on January 15th and June 15th) a report to the CGA detailing any Reportable Complaints and their outcomes, where known. Such reports will include:

- Total number of complaints received and resolved;
- Complaints by category (Responsible Gaming, General);
- Number of complaints escalated to ADR;
- Legal proceedings initiated by customers;

- Records of unresolved or escalated complaints will be retained for five (5) years or as required by applicable laws.

9. Policy Accessibility and Player Acknowledgment

The Company may, at its own discretion, publish this Player Complaints Policy as a standalone document, accessible via [insert direct links on the website's homepage].

The Company may, at its discretion and in accordance with applicable law, require players to explicitly acknowledge this Player Complaints Policy by means such as a checkbox, popup, or confirmation email during registration or when submitting a complaint.