

DRAFT

Player Complaints Policy

Policy Overview

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 Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

Adherence to this Complaints Policy is considered a requirement under the LOK and failure to comply will be addressed by the Curacao Gaming Authority (CGA) in accordance with its monitoring and enforcement procedures.

The Complaints Policy guarantees players access to a straightforward and effective dispute resolution process.

Execution of this Complaints Policy is the responsibility of the operator and supervised by the Compliance officer of the Company.

Procedure for Complaints

Players may lodge a complaint free of charge within six months of the incident. For fixed odds betting, this timeline begins after the event resolution.

Complaints must be submitted via an online form or downloadable Word/PDF form, clearly linked on the website and Terms and Conditions. Required information includes: name, address, account number, date of complaint, description, language preference and any supporting documents.

This form is available on the website for download. Completed form can be sent via e-mail to the relevant support e-mail for each specific brand

Complaint Resolution – Responsible Gaming

Responsible gaming complaints are prioritized. Company will do its utmost to attend to responsible gambling complaints within 1 business day. In case any extension is required, this must be communicated to players and cannot exceed a maximum period of two weeks

Complaint Resolution – General

Acknowledgement: Within one week of receipt, operators confirm the complaint, explain the process and provide a resolution timeline.

Resolution: Complaints are resolved within four weeks, extendable once with written notice. Final written determinations are required, including reasons or requests for additional information if necessary.

Alternative Dispute Resolution (ADR)

Operators must contract with at least one CGA-certified ADR provider within one month of publication. If internal resolution fails, players can escalate to ADR free of charge. ADR contact details must be included in all communications and website Terms and Conditions.

Authority Escalation

The CGA does not mediate individual disputes. Players believing regulatory breaches occurred may contact the CGA via its online form. Operators must state this clearly in procedures and Terms.

Player Support and Reporting

Complaints must be submitted through e-mail.

Operators must maintain records of all complaints (resolved, unresolved, escalated) for five years.

Semiannual reports (January 15 and June 15) must summarize complaints, outcomes, and ADR/legal escalations. The CGA may request access to records anytime.

Terms and Conditions

Complaint procedures must be clearly visible on the website and included in Terms and Conditions. Information must include: contact links, complaint submission details, response timelines, rights to ADR and regulatory contact, ADR process and CGA disclaimer.

Reasons for Complaint

Players can complain about any aspect of their experience, including: deposits, withdrawals, bonuses, account status, game fairness, responsible gaming, balances, KYC, data protection, software issues, AML, minors, fraud and licensing concerns.