

Player Complaints Policy (CW)

Date	Version	Description	Author
2025-08-03	1.0	Initial version of Player Complaints Policy. Document outlines the procedures and standards for handling player complaints and disputes at Slotbox N.V., including timelines, ADR process, roles and responsibilities, and reporting requirements in compliance with Curaçao regulatory framework.	Compliance Manager

1. Purpose and Regulatory Framework

This internal policy outlines the procedures and standards for handling player complaints and disputes at Slotbox N.V., an online casino licensed in Curaçao. It is designed to ensure a transparent, fair, and efficient process for resolving player issues in alignment with Curaçao regulatory requirements, which mandates that licensed operators maintain a formal complaints policy.

The policy guarantees that players have access to a straightforward complaint and dispute resolution process, including free access to independent Alternative Dispute Resolution (ADR)

Scope: This policy applies to all player complaints related to any product or service offered by Slotbox N.V. under its Curaçao license. It covers any expression of dissatisfaction by a player regarding the casino's operations, decisions, terms, or conduct.

2. Definitions

For the purposes of this policy, the following definitions apply:

- **Complaint:** A *Complaint* is a written expression of dissatisfaction by a player about the operator's services, decisions, terms, or conduct, indicating that the player is unhappy and expects a response or resolution. In practical terms, a matter becomes an official "Complaint" (subject to reporting requirements)

once the player submits a formal **Complaint Submission Form** or when an issue is escalated to an ADR entity.

- **Dispute:** A *Dispute* is a complaint that has not been resolved to the player's satisfaction through the internal complaints process and is escalated outside the initial process – either elevated within the organization or referred to an independent third party (for example, an ADR provider or a court of law). In other words, once a complaint moves beyond our final internal decision, it becomes a dispute.
- **Alternative Dispute Resolution (ADR):** ADR refers to independent services or bodies certified or recognized by the regulator to impartially resolve disputes between players and the operator. Under Curaçao's framework, licensed operators must offer players access to a **CGA-certified ADR provider** free of charge for unresolved complaints. ADR decisions may be binding or non-binding depending on the terms, but using ADR does not normally strip the player of the right to pursue legal action (see Section 7 and 10).
- **Player Inquiry vs. Complaint:** General player inquiries, feedback, or questions (e.g. about account management, game rules, etc.) that do not express dissatisfaction are not treated as formal complaints under this policy. They are handled by customer support as part of normal service. Only when a player communication clearly conveys dissatisfaction or a grievance that expects resolution will it be logged as a formal **Complaint** under this policy.
- **Responsible Gambling Complaint:** Any complaint that involves issues of responsible gambling – for example, concerns about self-exclusion not being honored, improper targeting of vulnerable players, delays in applying gambling limits, etc. – is treated with priority. These have special expedited timelines due to potential impacts on player well-being (see Section 5.1).

Note: Complaints can only be lodged by the registered player account holder themselves. Slotbox N.V. will not accept complaints on behalf of a player from third parties or agents, in line with LOK Article 1.3(c) which prohibits players from transferring or assigning their claims against the operator. All complaint communications must be in written form (e.g. email, online form submissions) so that a clear record is kept.

3. Complaint Submission and Acknowledgment

3.1 Lodging a Complaint

Players who wish to lodge a complaint must do so through the designated channels. Slotbox N.V. provides multiple avenues for players to submit complaints, ensuring accessibility and clarity:

- **Customer Support Channels:** In the first instance, players are encouraged to contact our Customer Support team via email or live chat with any issues or dissatisfaction. Our support agents are trained to handle many issues immediately and to attempt a prompt resolution where possible. If the support team resolves the matter to the player's satisfaction at this stage, the issue may be closed without need for a formal complaint record. **All such interactions will be documented** in our support system for audit and oversight.
- **Formal Complaint Submission:** If the issue is not resolved through the initial customer support interaction, or if the player prefers to formalize the complaint from the outset, the player will be asked to submit an official **Complaint Submission Form**. This form is available to the player free of charge. It can be accessed as a downloadable document (which can be emailed back to us) **and** as an online web form on our website. The form is provided in English and in any other language that our website is offered in, to accommodate the player's preference.
 - **Information Required:** The Complaint Submission Form will prompt the player to provide at minimum the following details, as required by CGA policy: the player's name, account username or number, registered address/place of residence, the date when the complaint is submitted, the date of the event/transaction in dispute, and a detailed description of the issue. The form may also include a list of categories or topics to help the player classify the nature of the complaint (e.g. deposit issue, bonus dispute, game fairness, etc.). The player is encouraged to attach or include any relevant evidence or screenshots. Slotbox N.V. may request **reasonable** supporting documentation or information if needed to thoroughly investigate the complaint. (Any such request for additional info

will be specific and pertinent to the issue; we will not impose excessive documentation burdens on the player.)

- **Acknowledgment of Receipt:** Upon receiving a formal complaint submission (either via the online form or by email), Slotbox N.V. will **promptly acknowledge** receipt in writing to the player. The acknowledgment will typically be sent via email to the player's registered email address. This acknowledgment will confirm that the complaint has been received and is being reviewed, and it will include an explanation of our complaint handling process and relevant timelines for next steps. (Specific timeframes for acknowledgments are outlined in Section 5, and differ for certain types of complaints.)
- **Complaint Logging:** Every complaint (formal submissions, and serious issues raised via support channels) is logged in our internal **Complaints Register**. The log entry will include the date of receipt, the player's details, a summary of the issue, the category of complaint, and any supporting reference numbers. The complaint will be assigned a unique ID or case number for tracking. It will also be assigned to the appropriate personnel (see Roles in Section 8) for handling. From this point forward, all actions taken on the complaint (acknowledgment, communications, investigation notes, resolutions) will be recorded in the register.

Slotbox N.V. does not charge any fee for accepting or processing complaints – the process is entirely free for the player at all stages. We also ensure that a player's decision to file a complaint will **not result in any negative treatment** or retaliation by the company; complaints are viewed as important feedback and are handled impartially.

3.2 Eligibility and Time Limit

All registered Slotbox N.V. players are eligible to submit complaints. As noted, the person lodging the complaint must be the account holder – complaints made by third parties (e.g. a lawyer or relative on behalf of a player) are not accepted, in order to comply with Curaçao's regulations on non-transferability of player claims.

Complaints should be submitted as soon as possible after the issue arises. The **maximum window** for filing a complaint is **within 6 months** from the date of the incident or transaction in question. For example, if the complaint concerns a bet

settlement or game outcome, the player must lodge the complaint within six months of that bet being settled. In cases of ongoing issues or series of events, the timeframe may be counted from the most recent relevant incident.

If a complaint is submitted after the six-month window, Slotbox N.V. reserves the right to decline to investigate due to it being out of scope. However, any such decision will be communicated with an explanation to the player. We also may exercise discretion in considering older issues if extenuating circumstances prevented timely submission (for instance, if a player was medically incapacitated).

3.3 Initial Review and Categorization

Upon receipt of a complaint, the responsible staff (Complaint Manager or Customer Support lead) will do an initial review to categorize the complaint and determine if it involves any **Responsible Gambling** or urgent issues (see Section 5.1 for special handling of those). All complaints are classified into categories (such as payment issues, bonus disputes, game fairness, account closure, responsible gambling, etc.) for reporting and analysis purposes. This classification will not delay the handling; it is an internal step to ensure the right priority and expertise is applied.

The complaint is then moved into the formal **Internal Resolution Process**, described in the next section.

4. Internal Complaint Handling Process

Slotbox N.V. follows a staged approach to resolving complaints internally. The process is designed to resolve issues at the earliest possible stage, but also to ensure that if a quick resolution is not possible, the matter is escalated appropriately and handled thoroughly. The stages of our internal complaint resolution are as follows:

1. Initial Customer Support Resolution: As noted, the first stage for any discontent is our front-line customer support. The support agent or representative who receives the complaint (via chat, email, or phone if applicable) will attempt to understand the issue and resolve it if possible. This could involve clarifying a term, assisting with a transaction, or correcting an obvious error. The agent will have access to the player's account information and transaction history needed to

investigate common issues (like bonus eligibility, missing credits, etc.). If the issue can be resolved immediately to the player's satisfaction, the support agent will document the outcome and the complaint will be closed at this stage. **If the player remains dissatisfied with the initial response or requests a formal review**, the agent will advise the player of their right to escalate the complaint to a formal process and provide or direct them to the Complaint Submission Form (if not already submitted). All relevant details gathered in the initial stage will be forwarded to the next level to avoid the player having to repeat information.

2. Formal Investigation by Complaints Officer: Once a formal complaint is logged (or an initial complaint is escalated), a **Complaints Officer** or designated manager within the organization takes charge of the case. This person is independent of routine customer service; typically part of our Compliance or Player Support management team, tasked with impartially reviewing and investigating complaints. The Complaints Officer will confirm to the player in writing that the complaint is under investigation (if not already confirmed) and will serve as the point of contact going forward.

- **Investigation:** The Complaints Officer will gather all relevant information pertaining to the complaint. This may include account records, game logs, transaction histories, communication transcripts, relevant screenshots or evidence provided by the player, and input from any staff or third-party providers involved (for example, input from the payments team for a withdrawal issue, or from a game supplier for a game outcome dispute). The Officer may reach out to the player if additional clarification or information is needed. Such a request for information will be made as early as possible in the process. (If reasonably required information is missing, the player will be given the opportunity to provide it. Should the player not furnish the requested information within a reasonable timeframe, the complaint may have to be closed or not upheld due to lack of evidence, but not before the player is warned of this consequence.
- **Internal Collaboration:** The Complaints Officer has the authority to consult with or escalate issues to other departments or senior management as needed. For instance, if the complaint alleges **fraud or serious misconduct**, the issue might be escalated to the Security or Fraud department and to the Compliance Officer. If it involves **responsible gambling**, our Responsible

Gaming team will be involved immediately. The goal is to ensure the complaint is examined from all relevant angles and that the final decision is accurate and fair.

- **Keeping the Player Informed:** During the investigation, if it becomes clear that resolving the complaint will take more time than initially indicated, the Complaints Officer will update the player about the delay and provide a revised expected timeline for resolution. Transparent communication is maintained, especially if an extension to the normal timeline is necessary (see Section 5 for permitted time extensions).

3. Resolution and Final Internal Response: After investigation, Slotbox N.V. will formulate a final response to the player's complaint. The Complaints Officer (with oversight from the Compliance Manager if needed) will prepare a written response that clearly states the **outcome of the complaint** and the rationale behind the decision. This final response will always be provided to the player in a durable form (such as email or letter). We ensure that every complaint receives a definitive answer – the player will not be left without a closure communication.

- If the complaint is **upheld** (i.e., we find in favor of the player), the response will explain the outcome and the remedy. Remedies could include things like crediting missing funds, correcting an error, offering compensation if appropriate, or changing an earlier decision. The response will detail what action is being taken to resolve the matter.
- If the complaint is **not upheld** (denied), the response will contain a clear explanation of the reasons. It will reference evidence or rules that justify our decision. For example, if a payout was refused due to a breached term, we will point to the specific term and how it was breached, along with any evidence. Our goal is to make sure the player understands **why** we arrived at the decision, even if they might disagree.
- In some cases, a complaint might be considered **not eligible or not pursued** (for instance, if the issue falls outside the six-month window or if the player failed to provide information we reasonably needed). In such cases, our response will detail why we cannot address the complaint, referencing any applicable policy reason. We will have given the player a chance to remedy the situation (e.g., provide missing info) before closing it. If ultimately we close the

complaint for inaction or ineligibility, we will document the grounds for doing so.

- The final response will **inform the player of their further escalation rights**. Specifically, if the player is not satisfied with the outcome of the internal process, we will advise that they **may escalate the dispute to an independent ADR provider**. The response will provide contact details for our designated ADR entity (or a link to how to initiate ADR) and remind the player that ADR is available at no cost to them. This step is crucial – it ensures the player knows the internal process is concluded and an external review can be sought if desired.

Once the final response is sent to the player, the internal complaint process is considered complete. The complaint case will be marked as “Resolved” or “Closed” in our register, with the outcome noted (e.g., resolved in favor of player, resolved in favor of house, or resolved mutually). If the player does not respond or pursue further action within a certain period (e.g. 8 weeks from final decision), we generally consider the matter fully closed. However, should the player later come back or directly file with ADR within a reasonable time, we will still honor the escalation path as required.

Throughout the internal process, Slotbox N.V. strives to act in **good faith and with transparency**. Our staff are instructed to remain professional and courteous, and to focus on facts and evidence when resolving complaints. The objective is to reach a fair outcome in line with our terms and regulatory obligations, without unnecessary delay.

5. Timeframes for Acknowledgment and Resolution

Slotbox N.V. adheres to strict timelines for handling complaints. These timeframes ensure that players receive prompt confirmations and timely resolutions. We distinguish between **Responsible Gambling-related complaints** (which may impact player welfare) and other types of complaints, as the former are given priority.

5.1 Responsible Gambling Complaints – Expedited Timeline

Complaints that involve responsible gambling issues (for example, a complaint that a self-exclusion was not honored, or that the casino targeted a vulnerable player

inappropriately) are fast-tracked due to their sensitive nature. Our policy is to use **best efforts to resolve such cases within five (5) business days**. The process for these complaints is as follows:

- **Acknowledgment:** Within **2 days** of receiving a responsible gambling-related complaint, we will **confirm receipt in writing** to the player. This confirmation will also include an explanation that the issue has been categorized as a responsible gambling concern and thus will be prioritized. We will outline how the complaint will be handled and indicate the expected timeline for resolution (aiming for the 5-business-day target).
- **Resolution Goal:** We aim to investigate and provide a final resolution to the player within **5 business days** of receiving the complaint. This accelerated timeline is contingent on the complexity of the case and the cooperation of the player (e.g., timely provision of any additional information if needed).
- **Extensions:** If a responsible gambling complaint cannot be fully resolved within 5 business days due to circumstances that require more time (for instance, awaiting information from a third-party provider or a detailed review of large data sets), we may extend the resolution timeframe *up to a maximum of two (2) additional weeks*. Any delay beyond the initial 5 days will be communicated to the player before the 5-day period lapses, explaining the reason for the delay and providing a new expected resolution date. Per regulatory guidance, two weeks is the maximum extension for such cases; we will not exceed a total of ~3 weeks (15 business days) from receipt to resolution for a responsible gambling complaint. The only exception is if a delay is caused by the player's own lack of response to a request for information – in that scenario, we will pause the clock and allow the player additional time (up to another 2 weeks maximum) to respond without penalizing our resolution period. We will clearly notify the player if the case is being held pending their input.

Even under an expedited timeline, we ensure that the final response remains thorough and evidence-based. The priority handling means these cases jump to the front of the queue and are addressed by senior staff immediately.

5.2 All Other Complaints – Standard Timeline

For all other types of complaints (e.g., payment issues, bonus disputes, technical problems, etc. that are not specifically about responsible gambling), the following timeframes apply:

- **Acknowledgment:** Within **one (1) week** of receiving the complaint, we will send the player a written confirmation acknowledging the complaint. In practice, we strive to acknowledge much faster (often within 24-48 hours), but one week is the outer limit allowed. The acknowledgment message will outline the steps we will take to investigate and process the complaint and will inform the player of the typical timeline for resolution. For example, we might state: "Your complaint has been received and assigned to our Complaints Team for review. We will investigate and aim to provide a full response within four weeks. We will keep you updated on the progress."
- **Resolution Goal:** We will provide a final response to the complaint within **four (4) weeks** of receiving it. This is the standard resolution period mandated by the CGA for non-expedited cases. During this period, the complaint will be investigated, and a decision reached as described in Section 4.
- **Extensions:** If a complaint is particularly complex or if we are awaiting critical information (either from the player or third parties) and cannot resolve it within the initial 4-week period, we are permitted to extend the resolution timeframe **once** by up to an additional **four (4) weeks**. This means the absolute maximum time for a final response would be eight weeks from the complaint receipt. Any such extension will be communicated to the player **before** the original 4-week deadline passes, explaining the reason for the delay and stating the new expected resolution date. We will only extend when truly necessary; it is in our interest and the player's interest to resolve matters as quickly as possible.
- **Player Delays:** Similar to the RG case, if the player fails to provide information we reasonably requested and that lack of information is holding up the investigation, we will inform the player that the clock is effectively paused. We might extend the timeline accordingly, but generally if a player does not respond within a reasonable additional time (e.g., two weeks), we may close the complaint due to insufficient information, as long as we had requested the info within the initial resolution period. This will be clearly conveyed to the

player in advance ("We cannot proceed with investigating your complaint without the requested details by X date...").

Summary of Timeframes: In all cases, the player will receive a timely acknowledgment (2 days for RG complaints, 7 days for others) and a final decision within a regulated maximum timeframe (with at most one extension if required). Internally, we track these deadlines closely to ensure compliance. The Compliance Officer or Complaints Manager monitors open complaints and their ages to avoid any breach of the allowed timeframes. If a deadline is approaching without resolution, it is escalated to senior management to expedite a conclusion or approval for an extension with proper player notification.

Slotbox N.V. understands the importance of timely complaint handling – undue delays can exacerbate player frustration and run afoul of regulatory expectations. Thus, meeting these timelines is a key performance indicator of our complaints management process.

6. Final Response and Escalation Rights

As described in Section 4, once our investigation is complete, the player will receive a **Final Response Letter** (or email) that closes the internal complaints process. This final response will include:

- A clear statement of the **outcome** of the complaint (upheld, partially upheld, or not upheld).
- If upheld (or partially), a description of the resolution offered to the player (e.g. amount refunded or action taken).
- If not upheld, the **detailed reasons** for our decision, referencing the relevant evidence, rules, or terms. We will show that we carefully considered the player's arguments. Any evidence or policy relied upon (game logs, T&C clauses, etc.) will be cited or attached if appropriate to provide transparency.
- If we are **unable to investigate** or **deny the complaint on formal grounds** (for example, complaint outside the allowed time frame or lack of required information), we will explain this clearly, including what requirement was not met. We will also note if the player can remedy the situation (if still possible) or if the case is closed without resolution.

Importantly, the final response will inform the player that if they remain dissatisfied with our decision, they have the right to escalate the matter to an **Alternative Dispute Resolution (ADR) provider**. We will provide the name and contact details of the ADR entity with which we have an agreement, and instructions on how to submit the dispute to ADR. We will make it clear that ADR is available **free of charge** to the player. We typically phrase this as: "If you are not satisfied with the outcome of this complaint, you may refer the dispute to [Name of ADR Organization], which is an independent dispute resolution service. This service is provided at no cost to you. We have attached information on how to contact and submit your case to [ADR Organization]."

Additionally, the final response may include a reminder of the **timeframe to use ADR**. (Some ADR providers or schemes suggest that a dispute should be referred to them within a certain period after the final internal response, such as within 12 months. We will communicate any such relevant timeframe to ensure the player does not miss the opportunity for ADR.)

Once the final response is issued, **no further internal appeal is available** within Slotbox N.V. We do not operate multiple layers of internal complaint appeals, in order to streamline the process. The player's next step, if unsatisfied, is external ADR. However, internally we will still cooperate and revisit the case if the ADR requests information or if any new evidence comes to light.

If a player, after receiving our final decision, writes back disputing it or providing new arguments, we will review their message. If it appears they are simply restating their unhappiness, we will politely refer them to ADR as per the procedure. If they actually present **new evidence or facts** that were not previously considered, the Complaints Officer may decide to re-open the investigation internally to consider the new information (essentially treating it as a continuation of the complaint). We will avoid getting into an unproductive back-and-forth; generally, one comprehensive internal review is the model, followed by ADR if needed.

By providing a thorough final response and a clear path to ADR, we ensure the player is not left without recourse. This final response letter is also a key document for compliance records and for the ADR stage, as it will typically be requested by the ADR entity to confirm that the internal process was completed.

7. Alternative Dispute Resolution (ADR)

Slotbox N.V. has arrangements in place for **independent Alternative Dispute Resolution**. ADR is an external process where a qualified, neutral third-party will review the dispute between the player and the operator and provide a resolution (which may be a recommendation or a binding decision depending on the ADR entity's terms).

Key points of our ADR policy:

- **Availability and Choice of ADR:** We will partner with at least one ADR service provider that is **certified or approved by the Curaçao Gaming Authority (CGA)**. The details of the ADR will be maintained in our Terms & Conditions and on our website's complaints page. We will ensure to always have an active agreement with at least one ADR entity and have uploaded proof of such agreement to the CGA portal. ADR services are **free of charge to the player** – all costs are borne by Slotbox N.V. We believe offering ADR at no cost is crucial in giving players confidence that they can seek an impartial resolution without financial barriers.
- **When ADR Can Be Used:** A player can escalate their complaint to the ADR provider **only after** the complaint has been fully processed through our internal procedure and a final response has been issued (or if the maximum time to respond internally has passed without resolution). We will not refuse to participate in an eligible ADR case, even if we believe our internal decision was correct. The player has the right to seek this external review. In our final response (Section 6), we explicitly inform the player of this right. Typically, the player would submit the dispute to the ADR body along with our final response letter and any supporting documentation. We will cooperate by sharing our perspective and evidence with the ADR as requested.
- **ADR Process and Outcome:** Once the dispute is with the ADR provider, that provider will operate under its own rules and procedures to reach a decision or recommendation. Slotbox N.V. will engage in the ADR process in good faith, providing any additional information or clarification the ADR officials ask for. If the ADR provider's decision is binding, we will comply with it as required. If it is non-binding and either party has the option to reject it, we will still give it

serious consideration and will generally accept the ADR's view unless we have strong reasons not to.

- According to CGA guidelines, **once an ADR process for a specific dispute is completed, neither the player nor the operator may restart the dispute with a different ADR provider for the same issue.** This prevents ADR "forum shopping." Thus, all parties have one shot at the ADR, so we make it count by providing comprehensive input during that process.
- If a player **withdraws or abandons the ADR process** after it has begun (for example, the player stops responding to the ADR or decides not to pursue it further), then the dispute may be considered closed without resolution. In such cases, the player would generally not be allowed to reopen the same complaint later. We would treat the matter as closed unless instructed otherwise by the regulator.
- **No Waiver of Legal Rights:** The use of ADR is intended as a free additional channel for dispute resolution. Slotbox N.V. will **not** require a player to waive their right to pursue legal action as a condition of using our internal process or the ADR process. We also will not impose mandatory binding arbitration or any clause that unduly restricts the player's legal rights, except perhaps in cases where a **mutual agreement** is in place under the ADR's specific terms (For example, if an ADR provider's process requires both parties to agree to be bound by the outcome *in that forum*, that is a mutual agreement specific to that ADR case – but even then, the player's fundamental right to seek legal redress cannot be eliminated entirely.) Curaçao's rules explicitly state that, aside from what is mutually agreed in ADR, the operator **must not restrict the player's right to take legal action.** Slotbox N.V. fully respects this: participation in ADR is voluntary for the player and does not preclude them from going to court if they choose.
- **Preventing Abuse of ADR:** We understand the CGA allows operators some leeway to set parameters to prevent frivolous or abusive use of ADR (for instance, setting a reasonable minimum monetary threshold for ADR, or preventing repeated disputes on the same matter). At this time, Slotbox N.V. has not set any specific minimum claim value for ADR eligibility – **any dispute** unresolved that meets the definition of a gambling-related complaint may go to ADR regardless of the amount. However, if we observe patterns of misuse

(e.g., frequent extremely minor complaints being escalated to ADR in bad faith), we may seek guidance or implement measures in line with CGA advice. For example, CGA has indicated that while low-value claims can be a concern for misuse, each case should be assessed on its merits, and even a low-value dispute about something like self-exclusion should be taken seriously. We will approach any such measures cautiously and always in compliance with the latest CGA policies.

- **ADR Contact Information:** The ADR provider information designated by Slotbox N.V. will be provided in our Terms & Conditions and on our website for players. If the designated ADR changes or if multiple options exist, we will keep the information updated and offer the player a choice if applicable.

In summary, ADR serves as an impartial second look at disputes and adds an extra layer of player protection. Slotbox N.V. embraces this as a positive step in Curaçao's regulatory evolution, and we consider ADR decisions and feedback as valuable input to improve our own processes.

8. Internal Roles and Responsibilities

Proper handling of player complaints requires clear internal responsibilities. Slotbox N.V. assigns specific roles to ensure the complaint management process is effective and compliant:

- **Customer Support Team:** Front-line customer service agents are responsible for receiving initial player communications, including potential complaints. Their duties include: recognizing when a player communication constitutes a **complaint** (expresses dissatisfaction), attempting to resolve straightforward issues immediately if possible, and guiding players on how to formally lodge a complaint when issues cannot be resolved on the spot. Support agents must always log complaints or potential complaints in the system and notify their supervisor or the Complaints Officer of any significant or unresolved issues. They also send the initial acknowledgment emails when a complaint is first logged, unless this is done by the Complaints Officer. The support team is expected to be courteous, objective, and helpful, never dismissive of a player's concerns. They receive training on identifying complaints and on our escalation procedures.

- **Complaints Officer / Specialist:** We have designated one or more Complaints Officers (or a Compliance Manager) who oversee the formal complaint process. This person, typically a senior member of Player Support separate from everyday support interactions) is responsible for **investigating complaints** impartially and coordinating the resolution. Key responsibilities of the Complaints Officer include: reviewing complaint details and evidence, liaising with other departments to gather information (technical teams, finance, game providers, etc.), formulating a fair resolution or decision, and drafting the final response to the player. The Complaints Officer ensures that **regulatory timeframes** are met – they monitor the clock on each complaint and take action to avoid any breach of deadlines. They also determine when a complaint should be classified as a responsible gambling issue (triggering the expedited timeline). The Complaints Officer is the primary point of contact for the player during the formal stage and should maintain professional and clear communication. Importantly, this Officer has the authority to decide an outcome objectively (e.g. approve a reimbursement or rule against the player's claim) in line with our policies; they should be insulated from improper influence (for example, commercial teams cannot pressure them to unfairly deny a claim).
- **Head of Customer Support / Operations Manager:** This role provides oversight and resources for the complaint handling function. The Head of Support might be involved in especially complex or VIP complaints, or in reviewing the decisions made by the Complaints Officer for consistency. They ensure that the Customer Support Team is adequately trained and that the Complaints Officer has access to all necessary data and personnel to investigate issues. In some cases, if a complaint raises questions about changing an internal process or a term & condition, the Operations Manager will be looped in to consider broader fixes.
- **Compliance Officer / Compliance Department:** The Compliance Officer (and team) is responsible for ensuring that the complaint handling process as a whole meets regulatory obligations. They keep the complaints policy up-to-date with current Curaçao GCB/CGA requirements. They also compile the **complaints reports** required by the regulator (see Section 9) and submit them on time. The Compliance Officer will periodically audit complaint files to ensure proper documentation and that resolutions are reached in line with

applicable rules and this policy. If a complaint reveals a potential breach of a license condition or law, the Compliance Officer must determine if it needs to be escalated within the company or reported externally. They also handle any direct communications with the CGA regarding complaints (for instance, if the CGA inquires about a particular case or if patterns of complaints are noted). Additionally, the Compliance team ensures that our **Terms & Conditions and player-facing communications** reflect the required information about complaints (such as referencing the complaints policy, listing ADR details, etc. as required by the CGA).

- **Management and Board:** Senior management (including directors and the CEO) are ultimately responsible for fostering a culture that treats player complaints seriously. They approve this policy and any subsequent material updates. They receive summaries or reports on complaints periodically to stay informed of issues that might indicate business or compliance risks. If a complaint is about a major issue (e.g., systemic error causing many players losses, or an accusation of unethical behavior by staff), management will be involved in decision-making and ensuring any necessary remedial action is taken (such as issuing a batch refund or disciplining an employee if needed). Management also ensures that the complaint function is independent – for example, that the Complaints Officer can make decisions that might have financial cost to the company without fear of reprisal, if it's the fair outcome.
- **Record Management Personnel:** Although not a separate person, it's worth noting that maintaining the complaint log and archives is assigned to a designated staff member (within either Compliance or Customer Support). They ensure all complaint records are stored properly, update statuses, and secure the data (complaint records contain personal data and must be kept confidential and in compliance with privacy laws). They assist the Compliance Officer in preparing the regulatory reports by retrieving data from the logs in the required format.
- **All Staff:** All employees of Slotbox N.V. are instructed that if they receive a complaint or become aware of a player grievance, they must direct it to the proper channels. For example, if a marketing employee is emailed a complaint directly by a player, that employee should forward it to the Complaints Officer or support team immediately rather than handling it themselves. Staff are also

expected to cooperate fully in any investigation (providing information from their area of work when required by the Complaints Officer).

Slotbox N.V. also conducts **training and awareness** for staff regarding this Complaints Policy. New customer-facing employees are trained on how to identify and escalate complaints. The Complaints Officer and Compliance staff stay up-to-date with any changes in regulatory expectations and best practices (including any guidance from MGA, UKGC, or other jurisdictions that may serve as best practice benchmarks, even if not strictly required by Curaçao law).

Internally, we encourage learning from complaints: if a particular complaint reveals a flaw in our processes or an ambiguity in our terms, the relevant teams are tasked with addressing the root cause (be it a technical fix, an update to terms, or improved communication to players). This continuous improvement mindset helps reduce future complaints and enhances overall compliance.

9. Record-Keeping and Reporting

Accurate record-keeping and timely reporting are fundamental parts of this policy. Slotbox N.V. maintains comprehensive records of all complaints and adheres to all reporting requirements set by the Curaçao regulator.

Complaint Register and Records: Every complaint is recorded in a centralized Complaints Register (database). The record for each complaint includes: the player's identifying details, date of complaint, summary of issue, category of complaint (see Section 3.3), all communications sent to or received from the player, notes of internal actions (investigation steps, calls, evidence), the final outcome, and the date of resolution/closure. We also log whether the complaint was resolved internally or escalated to ADR (and the outcome of ADR if applicable), and whether the player pursued legal action. These records are maintained in an organized manner such that any specific complaint file can be retrieved easily, and an overview of complaint statistics can be generated.

Retention Period: Complaint records (including those that remain unresolved or that were escalated outside) are retained for a minimum of five (5) years from the date of final resolution. This retention meets or exceeds the requirements of the CGA and also aligns with common legal statutes of limitation. In case data protection laws or other statutes require a longer retention for certain data, we will adjust accordingly, but five years is our baseline. All records are kept secure and

confidential, accessible only to authorized personnel, and safeguarded against loss or tampering.

Bi-Annual Regulatory Reporting: Slotbox N.V. submits detailed complaints reports to the Curaçao Gaming Authority **twice a year** (semi-annually) as mandated. Specifically, by **January 15** and **July 15** of each year; in any case we will follow the exact dates required by the regulator, which currently are mid-January and mid-June), we provide a report covering the complaints received in the previous half-year period. Each report includes aggregate and detailed information as required. The content of the report typically includes:

- The total number of complaints received in that period
- The number of complaints that were resolved (with a breakdown of how many were upheld in the player's favor versus rejected/not upheld)
- The number of complaints that are still **pending or unresolved** at the time of the report
- A breakdown of complaints by **category/topic** (e.g. X complaints about withdrawals, Y about bonuses, Z about responsible gambling, etc.)
- The number of complaints that were **escalated to ADR** in that period
- The number of complaints that led to the player taking **legal action**, and details if any (for example, if we are aware of lawsuits filed)
- Any other data points required by the CGA's reporting template or guidance (the CGA may update their required fields; we will ensure compliance with the latest specifications).

These reports are compiled by the Compliance Officer using the complaints register data. They are reviewed and approved by senior management before submission to ensure accuracy. We retain copies of all submitted reports. The purpose of these reports is to demonstrate our handling of complaints and allow the regulator to monitor for any concerning patterns.

Transparency and Internal Reporting: Beyond external reporting, complaint statistics and notable cases are also reported internally. The Compliance team provides at least a quarterly summary to management highlighting things like the number of new complaints, major issues raised, how many were resolved within the target timeframe, etc. This keeps our leadership informed of player sentiment

issues and compliance performance. If the reports show any spike in complaints or repeated issues in one category, it can trigger internal analysis and corrective actions.

Regulatory Access to Records: The Curaçao Gaming Authority reserves the right to request access to our complaint records at any time Slotbox N.V. will fully cooperate with any such requests. For instance, the CGA (Gaming Control Board) might ask for details on a specific complaint or a copy of our entire complaints log during an audit. We are prepared to provide those swiftly. We understand that the CGA uses complaints data as part of its supervisory and enforcement approach, and we maintain our records in an audit-ready state.

ADR Reporting: It is noted that ADR providers themselves may have obligations to report dispute statistics to the CGA under the forthcoming **ADR Policy**. While that is external to our operations, we collaborate with our ADR provider to ensure they have any data they need from us. From our side, we include ADR outcomes in our own records and reports as described.

In summary, our record-keeping and reporting practices not only fulfill regulatory obligations but also serve as a tool for internal governance. Meticulous records help protect the company in case of any future scrutiny and provide the data needed to continuously improve our services.

10. Regulatory Cooperation and External Escalation

Slotbox N.V. is committed to full cooperation with regulatory authorities regarding player complaints. We recognize that while the **Curaçao Gaming Authority (CGA)** may not intervene in individual disputes as a mediator, it plays a crucial role in overseeing operators' conduct and compliance. This section describes how we interact with the regulator and what external escalation avenues exist for players.

CGA's Role and Operator Obligations: It is the responsibility of Slotbox N.V. to make the role of the CGA clear to players (via our Terms & Conditions). The CGA will **not** resolve or make judgments on player complaints about gambling transactions – it is not an arbitration body for player disputes. Additionally, the CGA generally will not overturn the decisions made by us or by an ADR provider, unless it finds that a complaint was handled inadequately or a regulatory breach occurred. In practical terms, this means players should use our internal process and ADR for resolution, rather than expecting the CGA to award them a win in a

dispute. However, players are **not prohibited** from contacting the CGA: we **must not restrict or hinder a player from reaching out to the regulator** about concerns such as suspected malpractice or regulatory violations. Our policy and customer communications will never mislead players about this – indeed, we inform them that while the CGA doesn't settle individual claims, they can be contacted if the player believes the operator acted unlawfully.

Player Escalation to CGA: If a player believes that Slotbox N.V. is in breach of its license conditions, has acted fraudulently, or otherwise violated the law, they have the option to lodge a complaint or report to the CGA.

From Slotbox N.V.'s perspective, if a player escalates to the CGA, we will treat any inquiry or investigation by the CGA with utmost priority. **We will cooperate fully** by providing all requested records, explanations, and evidence to the regulator. Our Compliance Officer serves as the liaison to the CGA for such matters. We maintain open lines of communication and will be transparent about the case details. The policy of the company is to **never retaliate** against a player for contacting the regulator; if anything, we treat it as a sign of a serious issue that we need to address earnestly.

In line with this cooperative stance, if a complaint (or multiple complaints) indicate a serious problem (for instance, a systemic failure or a pattern of overstepping regulations), we may **proactively notify** the CGA, especially if player harm is ongoing. (This might not be a formal requirement in all cases, but as a best practice, voluntary disclosure can be viewed favorably. However, we will balance this with legal advice to avoid unnecessary self-incrimination — in general, though, honesty with regulators is the best policy.)

Legal Action by Players: Separate from regulatory escalation, a player always has the right to seek redress through the courts. If a player decides to pursue a lawsuit or other legal proceedings against Slotbox N.V. in relation to a gambling dispute, that is outside the scope of this internal policy. However, from an internal perspective, our Legal department will handle such cases. We note in our complaints log if a complaint has moved to litigation. At that point, typically direct communications with the player would occur via legal counsel rather than the complaints process.

We do not require players to exhaust ADR before going to court (though often courts may expect them to, depending on jurisdiction).

External Dispute Systems (MGA as Reference): While not directly applicable to Curaçao, we are aware of practices in other jurisdictions such as Malta (MGA) where the regulator's Player Support Unit can also get involved after internal and ADR processes. In Malta, for example, once a player has gone through the operator's process, they may refer the case to the MGA's support unit or an ADR. The MGA then liaises with the operator to facilitate a resolution. Curaçao's CGA does not currently have an identical function, but as a matter of best practice, we treat any regulator inquiry (CGA or others via cooperation agreements) seriously and respond promptly. If future Curaçao regulations introduce a more hands-on role for the CGA or a mediation body, we will adapt our policy accordingly.

No Over-Promising to Players: It's important for internal stakeholders to ensure that our external communications (website, support agents, T&Cs) do not over-promise what the complaints process can do. We clearly state that the CGA/GCB is not an arbitrator for individual complaints, to avoid giving players false hope that the regulator will directly fix their issue. Instead, we emphasize the correct path: internal resolution, then ADR, and mention the regulator in context of reporting breaches. This honest messaging is itself part of regulatory compliance and avoids any accusation that we misled players about their rights.

Continuous Improvement and Cooperation: In the spirit of cooperation, Slotbox N.V. views the regulator as a partner in ensuring a fair gaming environment. We are open to any feedback or directives from the CGA regarding our complaints handling. If the CGA were to identify a deficiency in our processes (for example, through an audit or as a result of multiple player complaints), we would take immediate corrective action and update this policy if needed. Additionally, we keep an eye on regulatory developments – for instance, if CGA issues new guidelines or if MGA/UKGC best practices evolve, we consider incorporating those to exceed the minimum where it makes sense (but always careful not to conflict with Curaçao requirements or to promise more than we can deliver).

In summary, **external escalation** for players after our process is ADR and, if about compliance issues, the regulator. Slotbox N.V. facilitates ADR and respects players' rights to contact authorities. We maintain a cooperative posture with the CGA, recognizing that our handling of complaints reflects on our suitability as a licensee. By resolving complaints fairly in-house and honoring external processes, we aim to minimize the need for regulatory intervention – but we stand ready to collaborate with oversight bodies whenever necessary.

11. Communication of Policy and Review

Though this is an internal policy document, much of its content has external implications. Slotbox N.V. ensures that the essence of this policy is **communicated to players** in the appropriate places:

- Our Terms & Conditions include a section summarizing the player complaints procedure, referencing this policy and detailing how a player can file a complaint, the fact that it's free, the time limits (6 months), expected timelines for response, and the availability of ADR and regulatory recourse. We explicitly inform players in the T&Cs that the **Curaçao Gaming Authority does not mediate individual disputes** and provide the contact they may use if they believe we have breached regulations. This manages expectations and aligns with regulatory requirements.
- We also publish a **Customer Complaints Policy** on our website (player-facing version), which covers the steps a player should take and their rights. This may be a sanitized version of this internal policy, focusing on what the customer needs to know, without internal role details. It is easily accessible (linked in the footer of the site and/or help section, and referenced at account registration). Players may be required to acknowledge it as part of agreeing to our terms.
- Our customer support staff is provided with scripts and FAQs so they can consistently convey the correct information about the complaint process to players who inquire.

Internally, this policy document is available to all relevant staff via our policy repository/intranet. New employees in customer-facing or compliance roles are trained on it during onboarding.

Review and Updates: This Complaints Policy is not static. It will be reviewed at least annually, and also **whenever there is a significant regulatory change or guidance update** from the CGA or other relevant authorities. Given that Curaçao's regulatory framework is evolving (the CGA may issue further rules, policies, or guidelines on complaints and ADR from time to time under the LOK), we stay alert to any such publications. The Compliance Officer is responsible for initiating a policy review in light of new requirements or if operational experience shows a need for improvement. Any changes to the policy will be documented, approved

by senior management, and if necessary, submitted to the CGA (for instance if they require notification of material changes).

We avoid making commitments in this policy that exceed regulatory obligations or our operational capacity, in order not to overpromise. However, we remain committed to best practices in complaint handling, drawing on high standards such a