

GENCO PURA B.V.

www.bz.com — CGA Licensed Operator

PLAYER COMPLAINTS & DISPUTE RESOLUTION POLICY

Policy Owner: Compliance Officer | Applicable Licence: CGA OGL/2024/1496/0934

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1. Introduction

1.1. Policy Statement

Genco Pura B.V. (“the Company”), operator of www.bz.com, is licensed and regulated by the Curaçao Gaming Authority (CGA) under licence number OGL/2024/1496/0934. The Company is committed to treating all customers fairly and to resolving complaints and disputes in a timely, transparent, and consistent manner.

This Player Complaints & Dispute Resolution Policy (“Policy”) sets out the framework by which the Company receives, investigates, and resolves complaints and disputes raised by customers or other affected parties. It operates in conjunction with the Company’s AML/CTF Policy, Age Verification & Underage Gambling Prevention Policy, Responsible Gaming Policy, and all other applicable compliance frameworks.

1.2. Purpose

The purpose of this Policy is to:

- Provide a clear, accessible, and fair process for raising and resolving complaints;
- Ensure compliance with CGA licensing conditions and the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”);
- Protect the rights of customers while safeguarding the integrity of the Company’s operations;
- Ensure that AML/KYC-related account restrictions and decisions are communicated clearly and are subject to appropriate review;
- Provide customers with a clear path to independent, external dispute resolution where an internal complaint cannot be resolved to their satisfaction;
- Maintain complete records of all complaints and their outcomes for regulatory and audit purposes.

1.3. Definitions

For the purposes of this Policy:

- **Complaint / Dispute:** Any expression of dissatisfaction by a customer regarding the Company’s products, services, decisions, or conduct, including account restrictions, payment delays, KYC requests, bonus terms, or game outcomes.
- **Complainant:** Any current or prospective customer, or their authorised representative, who submits a complaint.
- **Complaints Handler:** The designated staff member responsible for receiving, logging, and managing complaints at first instance.
- **CGA:** The Curaçao Gaming Authority, the Company’s licensing and regulatory authority.
- **ADR Provider:** A CGA-recognised, independent Alternative Dispute Resolution provider (e.g. [igamingADR](#)) to which the Company is adhered for the external resolution of unresolved player disputes.
- **AML/CTF Policy:** The Company’s Anti-Money Laundering & Counter-Terrorist Financing Policy, incorporated herein by reference.

2. Scope

This Policy applies to:

BZ.com

Genco Pura B.V.
Abraham Mendez Chumaceiro Blvd. 03, Willemstad, Curaçao



- All complaints and disputes submitted by customers of the Company's online gaming platform;
- All employees, contractors, and third parties acting on behalf of the Company who handle, process, or respond to complaints;
- Disputes arising from any aspect of the Company's operations, including but not limited to: account registration and verification; deposit and withdrawal processing; game outcomes and technical errors; account suspension, restriction, or closure; bonus and promotional terms; and KYC/AML document requests and decisions.

This Policy does not override the Company's legal obligations under the AML/CTF Policy or any applicable CGA regulatory notice. Where a dispute concerns an account restriction imposed for AML/KYC compliance reasons, Section 5 of this Policy applies.

3. Complaint Intake and Logging

3.1 Customers may submit a complaint through any of the following channels:

- Email to the Company's designated complaints address;
- Live chat or the in-platform support function;
- Written correspondence to the Company's registered address.

3.2 Upon receipt, the Complaints Handler must:

- Log the complaint in the Company's complaints register, assigning a unique reference number and recording the date and time of receipt;
- Identify the nature and category of the complaint (e.g. payment, KYC, game outcome, bonus, account decision);
- Confirm receipt to the complainant in writing within 48 hours, including the assigned reference number and an outline of the resolution process and expected timeframes;
- Flag any complaint that may have AML, fraud, or regulatory implications to the Compliance Officer immediately.

4. Dispute Resolution Process

4.1. Four-Stage Resolution Model

- **Stage 1 — First-Line Review:** The Complaints Handler reviews the complaint, gathers relevant account and transaction data, and attempts first-instance resolution.
- **Stage 2 — Internal Escalation:** If unresolved, or if the matter is complex or high-value, the complaint is escalated to a senior compliance staff member or the Compliance Officer for detailed review.
- **Stage 3 — Final Internal Decision:** The Compliance Officer issues a final written decision to the complainant, including the reasoning applied and reference to any relevant policy or term breached.
- **Stage 4 — External Referral:** If the complainant remains dissatisfied following the final internal decision, they are referred to the Company's designated ADR Provider in accordance with Section 6.

4.2. Timeframes

- Acknowledgement of receipt: within 48 hours;

- First-instance resolution (Stage 1): within 5 business days of acknowledgement, where reasonably possible;
- Final internal decision (Stage 3): within 15 business days of initial receipt, save for complaints requiring extended AML/KYC investigation, in which case the complainant is notified of the delay and revised timeframe in writing;
- Where a complaint cannot be resolved within these timeframes, the Complaints Handler must provide the complainant with a written status update and a revised expected resolution date.

5. AML/KYC–Related Disputes

Where a complaint concerns an account restriction, withdrawal delay, or closure arising from an AML/KYC decision, the following applies:

- The complaint is directed to the Compliance Officer and handled under this Policy in conjunction with the AML/CTF Policy;
- The Company is not obliged to disclose the specific internal risk indicators, suspicious activity considerations, or investigative detail underlying an AML/KYC decision, where such disclosure could prejudice an ongoing investigation, tip off a customer under review, or breach applicable anti-money laundering law;
- The complainant may be advised, in general terms, of the category of documentation or verification outstanding, and of the steps available to them to resolve the restriction;
- AML/KYC-related complaints are not eligible for referral to the external ADR Provider described in Section 6 to the extent that doing so would require disclosure of information protected under the Company's AML/CTF obligations or Curaçao law; the complainant retains the right to escalate such matters directly to the CGA.

6. External Resolution and Regulatory Escalation

6.1 In accordance with CGA licensing requirements under the LOK, the Company is adhered to a recognised, independent Alternative Dispute Resolution (ADR) provider for the resolution of player disputes that cannot be resolved internally.

6.2 Where a complainant remains dissatisfied following the Company's final internal decision (Stage 3 above), the Complaints Handler must:

- Inform the complainant, in writing, of their right to refer the dispute to the Company's designated ADR Provider;
- Provide the ADR Provider's contact details and a summary of the referral process;
- Cooperate fully and in good faith with the ADR Provider's investigation, including timely provision of requested account, transaction, and complaint-handling records.

6.3 The Company recognises that the ADR Provider must operate independently from the Company and that any decision issued by the ADR Provider will be given due consideration in accordance with the terms of the Company's adherence agreement with that provider.

6.4 Nothing in this Policy limits a complainant's right to escalate a complaint directly to the CGA at any stage, including via the CGA's public complaints channel.

7. Responsible Gaming–Related Complaints

Complaints relating to self-exclusion, deposit limits, or other responsible gaming controls are treated with particular urgency:



- Any complaint indicating the customer may be experiencing gambling-related harm is escalated immediately to the Compliance Officer;
- Requests to activate or extend self-exclusion or deposit limits are actioned without delay, in accordance with the Company's Responsible Gaming Policy, regardless of the status of any related complaint;
- Complaints alleging a failure of the Company's responsible gaming controls are logged, investigated, and reported to the CGA where required by licence conditions.

8. Roles and Responsibilities

- **Complaints Handler:** First point of contact; logs, categorises, and attempts first-instance resolution of complaints; escalates AML, fraud, or RG-flagged matters.
- **Compliance Officer:** Reviews escalated complaints; issues final internal decisions; oversees referral to the ADR Provider and liaison with the CGA; maintains the complaints register and reports on complaints trends to the Board.
- **Board of Directors:** Ultimate oversight of this Policy; receives periodic reporting on complaint volumes, categories, and outcomes; approves material revisions to this Policy.

9. Communication and Transparency

- A summary of this Policy, including how to submit a complaint and the availability of external ADR, is made available to customers via the Company's platform (e.g. Terms & Conditions or a dedicated Complaints page);
- All written communications to complainants are in clear, plain language, avoiding unnecessary technical or legal jargon;
- Complainants are kept informed of the status of their complaint at each stage of the process.

10. Record-Keeping

The Company maintains a complaints register recording, at minimum: the complainant's details, date of receipt, category and description of the complaint, actions taken, outcome, and any referral to the ADR Provider or CGA. Records are retained in accordance with Curaçao law and the Company's record-retention obligations under its licence, and are made available to the CGA upon request.

11. Training

- All staff involved in complaint-handling receive training on this Policy, the four-stage resolution model, applicable timeframes, and the boundaries between standard complaints and AML/KYC-sensitive matters;
- Training is refreshed at least annually or upon material revision of this Policy;
- Training records are maintained by the Compliance Officer.

12. Compliance and Consequences of Non-Compliance

Failure by any employee or contractor to comply with this Policy may result in disciplinary action, up to and including termination of employment or engagement, and may expose the Company to

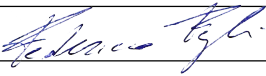
regulatory sanction by the CGA, including licence conditions, fines, or suspension. Any identified breach of this Policy must be reported to the Compliance Officer without delay.

13. Related Policies & References

- Anti-Money Laundering (AML) & Counter-Terrorist Financing (CTF) Policy
- Age Verification & Underage Gambling Prevention Policy
- Responsible Gaming Policy
- Cryptocurrency & Digital Asset Policy
- National Ordinance on Games of Chance (LOK)
- CGA licensing conditions and ADR adherence agreement (igamingADR or equivalent recognised provider)

14. Approval & Adoption

This Player Complaints & Dispute Resolution Policy has been reviewed and signed off by the Compliance Officer and approved by the Board of Directors of Genco Pura B.V.

Director	
Name: Federico Fogli	
Signature	
Date: Jul 20, 2026	