

comeon group

Complaints Policy

Classification	Owner	Title	Approved by
Highly Confidential	Compliance team	Compliance Officer	Silvana Zammit

Document History

Author	Approver	Date	Revision History	Version
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Purpose

This policy is to explain in detail how we assess, direct and handle internal and external complaints from all jurisdictions, internal escalations and how we file complaints.

Scope

There are two types of complaints that can be received:

1. Internal Complaints - Issues that come directly from the customer through Customer Support to resolve their issue.

2. External Complaint - When a customer is not satisfied with the answer of the Internal Complaint and they reach out to the regulator or Alternative Dispute Resolution body (“**ADR**”)¹ to mediate and come up with a binding outcome to the issue.

This complaints policy covers the Company’s operations in Curaçao.

Internal Complaints

Definition of Complaint: When an issue has not been resolved within the first instance by Customer Support (“**CS**”) - usually on live chat. When a chatbot is undertaking the chat conversation, it is programmed to forward to a human once RG-related words are communicated by the customer.

In order for a customer to make an official internal complaint, they are instructed by Customer Support to write an email with the subject title listed as ‘Complaint’ to support@*brandname*.com and give a very detailed explanation of the issue. Details as to how a complaint is to be filed are provided to customers in the T&Cs.

If a complaint is related to Responsible Gaming (“**RG**”) issues and there is a refund request of €2,000 or less, they are to be investigated and resolved by senior agents within the CS team. Should the refund request be over €2,000 however, this will be escalated by the senior agents to the RG department for further investigation and for determining the outcome of the complaint.

Should the customer be suspected of fraudulent or money-laundering activity, or should the complaint relate to payments, the complaint is to be escalated to the Anti-Money Laundering/Risk Department or the Fraud and Payment team for further investigation.

The relevant team will investigate the complaint and provide a reply within 10 business days from the date on which the official complaint is received. The Company reserves the right to extend the period to communicate an outcome to the customer to his complaint by a further 10 business days.

External Complaints

Should a customer not be satisfied with the outcome to their complaint with the Company, they have the right for a recourse through a designated third-party company, designated and registered as an ADR. ADR details shall be provided in the T&Cs and customers are to be directed to the ADR when the outcome of their complaint is communicated to them. .

¹ An ADR will be contracted for the purposes of the Company’s operations in Curaçao, before the Company goes live. A due notification to the Curaçao Gambling Authority will be duly made.

Should any emails from the ADR be sent to Customer Support, they must be forwarded directly to Compliance without delay.

The Compliance team will look into the dispute, and determine the reply to the ADR within the stipulated timeframes dictated by the ADR.

Record-Keeping

All records of complaints, both internal and external, need to be recorded on a designated sheet.

The Internal Complaints sheet must be filled in by the senior agent that is investigating and replying back to the customer.

An External Complaints sheet must be filled in by the compliance officer that is investigating and replying to the authorities/ADR.

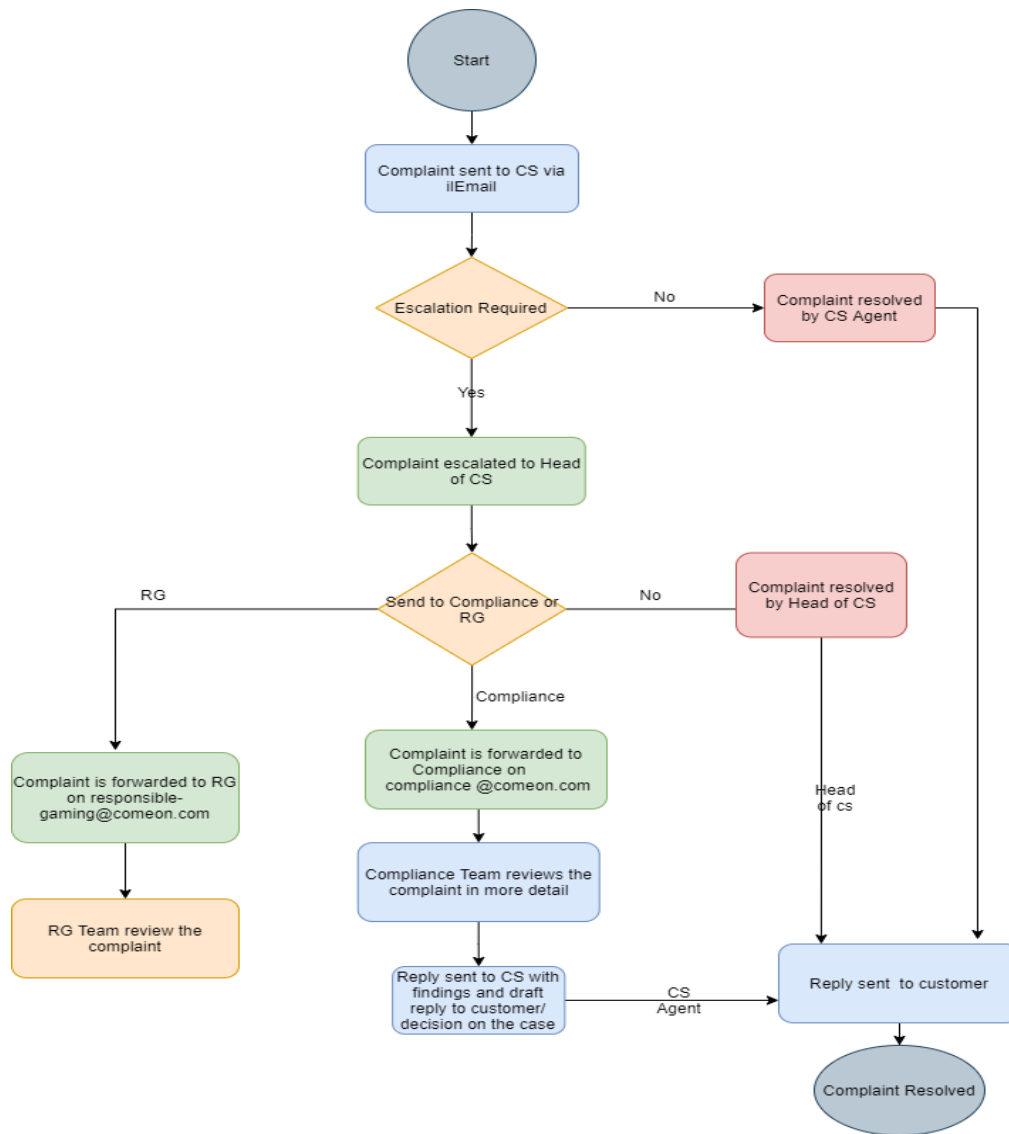
A manual note is to be inputted in the Back Office (under 'Manual Player notes') indicating that an external complaint has been received and is being investigated. The outcome from the authorities/ ADR is also to be recorded under the same sections, once a final decision has been received..

Complaints which are responsible-gaming related and include a refund request must be entered in another designated sheet. -

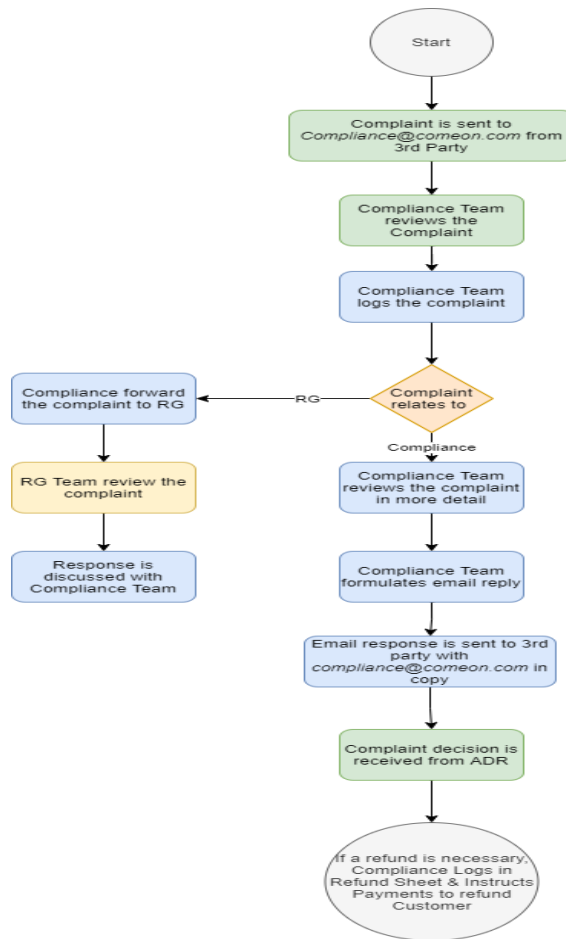
Bi-yearly, on January 15th and June 15th, reports on complaints are to be made to the CGA on the basis of the complaints received during such periods. Such submission shall be on the basis of the Complaints Submission Form.. In order to make sure we store all evidence, all emails and reports along with replies must be saved in individual folders in the Google drive under 'Complaints' with access on a need-basis

Flowcharts for Complaints:

Internal Complaints -



External Complaints -



Review

This document shall be reviewed annually or whenever events requiring changes to this document occur (whichever comes first).