

PLAYER COMPLAINTS POLICY

Famagousta B.V.

Version 2.0

DOCUMENT CONTROL

Document Title	Player Complaints Policy
Owner	Compliance Department
Approved By	Senior Management
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Version	2.0 (1. New Template 2. Added Cadre as the ADR Provider of the company 3. New Complaint Form)

1. PURPOSE

Famagousta B.V. (the “Company”, “Operator”, “we”, “our” or “us”) is committed to maintaining the highest standards of fairness, transparency, integrity and customer service in the provision of its gaming services.

The Company recognises that, despite its commitment to providing a high-quality gaming experience, circumstances may arise where a player wishes to raise a concern, express dissatisfaction or challenge a decision taken by the Company. In such circumstances, players must have access to an effective, accessible and transparent complaints process.

This Player Complaints Policy establishes the framework through which player complaints are received, assessed, investigated, resolved and, where appropriate, escalated to an independent Alternative Dispute Resolution (“ADR”) provider.

This Policy has been adopted in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen – “LOK”), the requirements of the Curaçao Gaming Authority (“CGA”), and all applicable regulatory obligations governing complaint handling and dispute resolution.



This Policy forms part of the Company's regulatory framework and is referenced in the Company's Terms and Conditions.

Nothing in this Policy shall restrict any rights available to players under applicable law

2. SCOPE

This Policy applies to all players using gaming services provided by Famagousta B.V.

Players may submit complaints regarding any aspect of their relationship with the Company or any incident arising from their participation in a game of chance offered by the Company.

This Policy applies from the date on which the Company became licensed and authorised to operate under the applicable regulatory framework.

3. COMMITMENT TO FAIR COMPLAINT HANDLING

Famagousta B.V. is committed to ensuring that all complaints are handled in accordance with the following principles:

Fairness

Each complaint will be assessed objectively, consistently and on its individual merits.

Accessibility

Players may submit complaints free of charge through the procedures established by this Policy.

Transparency

Players will be informed of the complaint handling process, applicable timelines and available escalation mechanisms.

Timeliness

Complaints will be investigated and resolved within the timeframes specified in this Policy.

Independence

Where a complaint cannot be resolved internally, players will have access to independent Alternative Dispute Resolution services.

Confidentiality

All complaints and supporting documentation will be handled in accordance with applicable privacy, confidentiality and data protection requirements.

4. DEFINITIONS

4.1 Player Interaction

A Player Interaction means any written communication initiated by a player and directed to the Company's Customer Support Team, including:

- General enquiries;
- Requests for assistance;
- Requests for clarification;
- Requests for information;
- Feedback; and
- Other non-complaint communications.

A Player Interaction does not automatically constitute a formal complaint.

4.2 Complaint

A Complaint is a written expression of dissatisfaction by a player relating to the Company's services, decisions, terms, procedures, products or conduct, where the player expects a response or resolution.

For reporting purposes, a Complaint is deemed to have been formally submitted when the Company's Complaint Submission Form has been completed and submitted by the player, or where a complaint has been escalated to ADR.

4.3 Dispute

A Dispute is a complaint that has not been resolved to the player's satisfaction through the Company's internal complaints process and has been escalated either internally, to an ADR provider or to a court of competent jurisdiction.

5. COMPLAINT ELIGIBILITY AND COMPLAINT WINDOW

Only the registered account holder may submit a complaint. Complaints submitted by third parties will not be accepted unless otherwise required by law.

Players may submit a complaint free of charge within six (6) months of:

- The settlement of the relevant wager;
- The conclusion of the relevant event; or
- The occurrence of the incident giving rise to the complaint.

In the case of peer-to-peer games, including poker, and ante-post betting markets, the six-month period begins upon settlement of the wager or conclusion of the relevant event.

Players submitting complaints relating to in-running sports betting are encouraged to act promptly, as certain data relevant to the investigation may only be retained for limited periods due to the nature of in-running betting markets.

In accordance with Article 1.3(c) of the LOK, claims against a licensed gaming operator may not be sold, assigned, donated, rented, leased, pawned or otherwise transferred to a third party.

6. COMPLAINT SUBMISSION PROCESS

Step 1 – Contact Customer Support

As a first step, players should contact the Company's Customer Support Team using the communication channels made available on the relevant websites.

Information regarding available contact methods can be found in the "Contact Us" section of the website.

Customer Support will make reasonable efforts to investigate and resolve the issue before a formal complaint becomes necessary. This support may be provided through live chat, email, contact forms or any other communication channels made available by the Company.

Step 2 – Formal Complaint Submission

Where Customer Support is unable to resolve the matter, the player may request to submit a formal complaint.

The Customer Support Team will provide the Company's official Complaint Submission Form to the player.

The Complaint Submission Form will be available in English and in the language of the website used by the player.

The form shall require, at a minimum:

- Full name;
- Residential address;
- Place and country of residence;
- Account number, username or player ID;
- Date of complaint;
- Date of disputed event; and
- Description of the matter being disputed.

The Company may request reasonable supporting documentation necessary for the investigation of the complaint.

7. COMPLAINT INVESTIGATION AND RESOLUTION

7.1 Registration of Complaints

Upon receipt of a completed Complaint Submission Form, Famagousta B.V. will register the complaint within its complaint management system and commence an internal review.

The Company will assess whether sufficient information has been provided to enable a proper investigation and may request additional information or supporting documentation where reasonably necessary.

The Company expects players to cooperate with reasonable requests for information during the investigation process.

7.2 Investigation Process

Each complaint will be investigated objectively, fairly and consistently.

In assessing a complaint, the Company may consider:

- The information provided by the player;
- The Company's Terms and Conditions;
- Applicable game rules;
- Account records;
- Transaction records;
- Communications between the player and the Company;
- Information obtained from game providers;
- Information obtained from payment service providers;
- Fraud prevention records;
- Responsible Gaming records; and
- Any other information relevant to the complaint.

The Company may consult internal departments, external suppliers or service providers where necessary to ensure that complaints are properly investigated.

7.3 Communication During Investigation

The Company will maintain appropriate communication with the player throughout the complaint process.

Such communication may include:

- Confirmation of receipt;
- Requests for further information;
- Updates regarding the progress of the investigation; and
- Notification of any delays or extensions.

All formal complaint communications will be provided in writing.

8. COMPLAINT RESOLUTION TIMEFRAMES

Famagousta B.V. recognizes the importance of resolving complaints promptly and efficiently.

The Company has established separate procedures for Responsible Gaming complaints and all other complaint categories.

8.1 Responsible Gaming Complaints

Complaints relating to Responsible Gaming matters shall receive priority treatment due to the potential impact on player welfare and protection.

A complaint will be categorized as a Responsible Gaming complaint where it concerns, among other matters:

- Vulnerable players;
- Self-exclusion requests;
- Cooling-off periods;
- Failure to implement self-exclusion measures;
- Failure to implement cooling-off measures;
- Responsible Gaming controls;
- Access restrictions imposed for player protection; or
- Any matter affecting player wellbeing.

Within two (2) days of receiving a Responsible Gaming complaint, the Company will:

- Confirm receipt of the complaint in writing;
- Explain how the complaint will be processed; and
- Inform the player of the expected timeline for resolution.

The Company will use its best efforts to resolve Responsible Gaming complaints within five (5) business days.

Where additional time is required to conduct a reasonable and informed investigation, the Company may extend the review period by up to two (2) weeks.

If a delay is caused by the player's failure to provide requested information or documentation, the review period may be extended by a further period of up to two (2) weeks.

8.2 All Other Complaint Types

For all complaints that are not classified as Responsible Gaming complaints, the Company will assess and respond within four (4) weeks of receiving the completed Complaint Submission Form.

Within one (1) week of receiving the complaint, the Company will:

- Confirm receipt in writing;
- Explain how the complaint will be processed; and
- Inform the player of the expected timeline for resolution.

Where a complaint is particularly complex, or where additional information is required to enable a proper investigation, the Company may extend the review period once for a maximum of four (4) additional weeks.

The player will be notified in writing of the extension and the reasons for the delay.

9. FINAL DETERMINATION

At the conclusion of the investigation, the Company will provide the player with a written Final Determination.

The Final Determination will contain:

- The outcome of the investigation;
- The Company's findings;
- The reasons supporting the decision;
- Any relevant evidence considered;
- Any corrective action taken where applicable; and
- Information regarding the player's right to escalate the complaint to ADR.

9.1 Complaint Upheld

Where the complaint is upheld, the Company will explain the corrective action or remedy being offered and any actions taken to address the matter.

9.2 Complaint Rejected

Where the complaint is rejected, the Company will provide a reasoned explanation for its decision.

9.3 Insufficient Information

Where additional information is reasonably required to properly investigate the complaint, the Company will request such information during the applicable review period.

Where the player fails to provide the requested information within the applicable investigation period, the Company may reject the complaint on the basis that it cannot be properly assessed.

9.4 Escalation Rights

Where the player remains dissatisfied with the Company's Final Determination, the player will be informed of their right to refer the matter to the Company's designated ADR provider.

10. ALTERNATIVE DISPUTE RESOLUTION (ADR)

Famagousta B.V. provides access to independent Alternative Dispute Resolution services in accordance with its licensing obligations and the requirements of the Curaçao Gaming Authority.

10.1 ADR Provider

The Company's designated Alternative Dispute Resolution (ADR) provider is CADRE.

If a player remains dissatisfied after completing the Company's internal complaints procedure, they may refer their complaint to CADRE in accordance with the applicable ADR procedures and rules.

CADRE's dispute resolution services can be accessed through its website at www.cadre.online. The ADR proceedings will be conducted in accordance with CADRE's Rules of Procedure, available at: www.cadre.online/rules-of-procedure/.

10.2 Cost of ADR

ADR services are provided free of charge to players.

Famagousta B.V. bears all costs associated with ADR proceedings.

10.3 Referral to ADR

A complaint may only be referred to the Alternative Dispute Resolution (ADR) provider once the Company's internal complaints procedure has been fully exhausted.

Upon request, the Company will provide players with information regarding the ADR process, including details on how to contact CADRE.

Further information regarding the ADR process can be found in the Terms and Conditions of the relevant operating website.

10.4 ADR Finality

Once ADR proceedings have been completed, the same dispute may not be recommenced before another ADR provider.

Where a player voluntarily withdraws from ADR after proceedings have commenced, the dispute may be considered closed and may not be re-opened through another ADR provider.

Nothing in this Policy shall restrict any rights available to players under applicable law unless otherwise permitted by law.

11. ROLE OF THE CURAÇAO GAMING AUTHORITY

Famagousta B.V. is licensed and regulated in accordance with the applicable gaming laws and regulations of Curaçao.

The Curaçao Gaming Authority ("CGA") is responsible for supervising compliance with applicable legislation, license conditions and regulatory requirements.

The CGA does not act as a mediator in individual gambling disputes and does not ordinarily determine contractual disputes between players and licensed operators. Accordingly, players are expected to utilise the Company's internal complaints procedure and, where appropriate, the ADR process before seeking other remedies.

Nothing in this Policy prevents a player from contacting the CGA regarding concerns that may indicate:

- Regulatory breaches;
- Violations of licence conditions;
- Responsible Gaming failures;

- Integrity concerns;
- Suspected misconduct;
- Whistleblowing matters; or
- Any matter falling within the CGA's supervisory remit.

Information submitted to the CGA may be used by the Authority in the exercise of its supervisory, monitoring and enforcement functions.

12. USE OF ARTIFICIAL INTELLIGENCE

Famagousta B.V. may utilise automated technologies, including Artificial Intelligence ("AI"), to assist in the administration, categorisation, routing, monitoring and management of complaints.

The use of AI is intended to support operational efficiency and consistency and does not remove the Company's responsibility to ensure fair complaint handling.

The Company shall ensure that:

- Appropriate human oversight is maintained over AI-assisted complaint handling processes;
- Complaints involving Responsible Gaming matters are reviewed by appropriately trained personnel;
- Complaints involving complex factual, legal or regulatory issues are not determined solely by automated means;
- AI-assisted systems are monitored to ensure accuracy, consistency and fairness; and
- Complaint outcomes remain subject to human review where required.

The Company remains fully responsible for all complaint decisions regardless of whether AI-assisted technologies are utilised.

13. RECORD KEEPING AND REGULATORY REPORTING

13.1 Complaint Records

Famagousta B.V. maintains records of all formal complaints submitted through the Complaint Submission Form process.

Records may include:

- Complaint Submission Forms;
- Supporting documentation;
- Investigation records;
- Internal assessments;

- Correspondence with the player;
 - Final Determinations;
 - ADR referrals;
 - ADR decisions;
 - Corrective actions implemented; and
 - Any other information relevant to the complaint.
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13.2 Retention of Records

Complaint records shall be retained in accordance with applicable legal, regulatory and data protection requirements.

Where complaints remain unresolved, are subject to ADR proceedings or become the subject of legal proceedings, records shall be retained for the lesser of:

- Five (5) years; or
- Any longer period required by applicable law or regulatory requirements.

The Company may retain records for longer periods where required to comply with legal obligations or to protect legitimate interests.

13.3 Regulatory Reporting

Famagousta B.V. maintains complaint statistics and management information for regulatory reporting purposes.

The Company shall prepare and submit complaint reports to the Curaçao Gaming Authority in accordance with applicable regulatory requirements.

Such reporting may include:

- Number of complaints received;
- Complaint categories;
- Resolution outcomes;
- Complaint handling timeframes;
- ADR referrals;
- Responsible Gaming complaints; and
- Other information required by the CGA.

The Company shall submit complaint reports to the CGA in accordance with the reporting periods and deadlines prescribed by the Authority.

14. TERMS AND CONDITIONS DISCLOSURE

Famagousta B.V. shall ensure that information concerning player complaints and dispute resolution is made available through the Company's Terms and Conditions and other appropriate customer-facing materials.

At a minimum, players shall be informed of:

- The existence of the Company's complaints procedure;
- How complaints may be submitted;
- Applicable complaint submission time limits;
- The availability of ADR services;
- The identity of the Company's ADR provider;
- The availability of Responsible Gaming complaint procedures; and
- Any other information required by applicable law or regulatory requirements.

The current version of this Policy shall be made available to players through the Company's websites.

15. PLAYER RIGHTS

Famagousta B.V. recognizes and respects the rights of players throughout the complaints process.

Players have the right to:

- Submit complaints free of charge;
- Receive fair and objective consideration of their complaints;
- Be treated respectfully and professionally;
- Receive written acknowledgements and decisions;
- Be informed of complaint handling timelines;
- Provide supporting information and evidence;
- Receive explanations regarding complaint outcomes;
- Escalate unresolved disputes to CADRE;
- Contact the Curaçao Gaming Authority regarding regulatory concerns;
- Seek independent legal advice; and
- Pursue any remedies available under applicable law.

The exercise of complaint rights shall not adversely affect a player's entitlement to fair treatment by the Company.

16. POLICY REVIEW

Famagousta B.V. regularly reviews this Policy to ensure continued compliance with:

- Applicable laws;
- Regulatory requirements;
- Licensing obligations;
- Industry best practices; and
- Operational requirements.

The Company reserves the right to amend this Policy from time to time.

Amendments may be made to reflect:

- Legislative changes;
- Regulatory developments;
- Changes in ADR requirements;
- Operational improvements;
- Technological developments; or
- Enhancements to complaint handling procedures.

The most recent version of this Policy shall be published on the Company's websites and shall become effective upon publication unless otherwise specified.

APPENDIX A – COMPLAINT CATEGORIES

For internal management, investigation and regulatory reporting purposes, complaints may be classified under one or more of the following categories:

1. Deposits
2. Withdrawals
3. Account Verification (KYC)
4. Account Restrictions or Closure
5. Bonus Offers and Promotions
6. Betting Settlement
7. Game Outcomes
8. Technical Issues
9. Responsible Gaming
10. Data Protection and Privacy
11. Anti-Money Laundering (AML) Procedures
12. Fraud Prevention Measures
13. Underage Gambling Concerns
14. Terms and Conditions
15. Customer Service
16. Licensing and Regulatory Matters
17. Other

The Company reserves the right to reclassify complaints where necessary to ensure accurate investigation and regulatory reporting.

APPENDIX B – COMPLAINT RESOLUTION FLOW

Step 1: Player contacts Customer Support through the communication channels available on the website.



Step 2: Customer Support investigates the matter and attempts to resolve the issue.



Step 3: If the matter cannot be resolved, the player may request to submit a formal complaint.



Step 4: Customer Support provides the Company's Complaint Submission Form.



Step 5: Player completes and returns the Complaint Submission Form together with supporting documentation.



Step 6: Famagousta B.V. acknowledges receipt and commences investigation.



Step 7: The Company reviews all relevant information, records and evidence.



Step 8: The Company issues a written Final Determination.



Step 9: If the player accepts the determination, the complaint is closed.

OR



Step 10: If the player remains dissatisfied, the complaint may be referred to CADRE.



Step 11: CADRE conducts an independent ADR review in accordance with its procedures.



Step 12: Matter concluded.

APPENDIX C – OFFICIAL COMPLAINT SUBMISSION FORM

Important Information

This Complaint Submission Form is provided by Famagousta B.V. where Customer Support has been unable to resolve a player's concern.

Submission of this form initiates the Company's formal complaint procedure.

All information supplied must be accurate and complete.



SECTION 1 – PLAYER DETAILS

- Full Name:
- Residential Address:
- City:
- Country of Residence:
- Registered Email Address:
- Username / Account ID:
- Telephone Number (optional):

SECTION 2 – COMPLAINT DETAILS

- Date of Complaint:
- Date of Disputed Event:
- Complaint Category:

- ☐ Deposits
- ☐ Withdrawals
- ☐ KYC Verification
- ☐ Account Restriction
- ☐ Bonus / Promotion
- ☐ Betting Settlement
- ☐ Game Outcome
- ☐ Technical Issue
- ☐ Responsible Gaming
- ☐ Data Protection
- ☐ AML Procedures
- ☐ Fraud Prevention
- ☐ Terms and Conditions
- ☐ Customer Service
- ☐ Licensing / Regulatory Matter
- ☐ Other

SECTION 3 – DESCRIPTION OF COMPLAINT

Please provide a detailed description of your complaint, including relevant dates, transactions, amounts and events.

SECTION 4 – RESOLUTION SOUGHT

Please explain the outcome or remedy you are seeking.

SECTION 5 – SUPPORTING DOCUMENTATION

Please list any supporting documents attached:

- ☐ Screenshots
- ☐ Transaction Records
- ☐ Chat Correspondence
- ☐ Email Correspondence
- ☐ Identity Documents
- ☐ Other

SECTION 6 – DECLARATION

I confirm that:

- The information provided in this Complaint Submission Form is true and accurate to the best of my knowledge;
- I am the registered account holder;
- I understand that Famagousta B.V. may request additional information to investigate my complaint;
- I understand that I may refer the matter to CADRE if I remain dissatisfied following completion of the Company's internal complaints process.

Name:

Signature (if applicable):

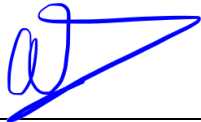
Date:

APPENDIX D – POLICY APPROVAL AND SIGN-OFF

This Policy has been reviewed and approved by the appropriate authorized persons and shall become effective on the Effective Date stated below.

Policy Name	Player Complaints Policy
Version	2.0
Effective Date	01.07.2026
Review Date	25.06.2026
Document Owner	Compliance Department
Approved By	Senior Management

APPROVAL RECORD

Role	Name	Signature	Date
Director / Authorised Signatory	Andrea Maria Engelhardt eMagnus Curacao B.V.		6/29/2026

By signing this document, the undersigned confirm that they have reviewed this Policy, approve its contents, and authorize its implementation and ongoing enforcement.