

# DMG SOLUTIONS

## B.V:

### Complaints Policy

|                        |                              |
|------------------------|------------------------------|
| Version:               | v1.2                         |
| Date of version:       | 18 <sup>th</sup> August 2025 |
| Created by:            | Laurence Alexander           |
| Approved by:           | Board<br>of Directors        |
| Confidentiality level: | Sensitive                    |

*DMG Solutions B.V (The “**Company**”)*

## Table of Contents

|                                                |          |
|------------------------------------------------|----------|
| <b>1. Policy Statement.....</b>                | <b>3</b> |
| <b>1.1 Revision History .....</b>              | <b>3</b> |
| <b>1.2 Approvals .....</b>                     | <b>3</b> |
| <b>2. Complaint Submission .....</b>           | <b>3</b> |
| <b>2.1 Informal Complaint .....</b>            | <b>3</b> |
| <b>2.2 Formal Complaint .....</b>              | <b>4</b> |
| <b>2.3 Complaint Form .....</b>                | <b>4</b> |
| <b>2.4 Complaint Window .....</b>              | <b>4</b> |
| <b>3. Complaint Resolution .....</b>           | <b>4</b> |
| <b>3.1 Response and Resolution .....</b>       | <b>4</b> |
| <b>3.2 Response Timeline .....</b>             | <b>5</b> |
| <b>3.3 Resolution Timeline.....</b>            | <b>5</b> |
| <b>4. Alternative Dispute Resolution.....</b>  | <b>5</b> |
| <b>5. Record Keeping and Reporting .....</b>   | <b>5</b> |
| <b>6. Website Content .....</b>                | <b>6</b> |
| <b>Appendix 1: Reasons for Complaint .....</b> | <b>7</b> |

# 1. Policy Statement

As a holder of a remote gaming operating licence issued by the Curacao Gaming Authority (“**CGA**”) the Company is obliged to comply with all gambling laws, licence conditions and codes of practice issued by the CGA.

This Policy is aligned to The Player Complaints Policy Guidelines issued by the CGA and by default the (Landsverordening op de kansspelen, “**LOK**”). The Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

## 1.1 Revision History

| Version | Issue Date | Next Review | Key Revisions                                                             |
|---------|------------|-------------|---------------------------------------------------------------------------|
| 1.1     | 10/01/2025 | -           | Initial draft for licence application                                     |
| 1.2     | 18/08/2025 | 18/08/2026  | Compliance with Curacao Complaints Policy v1.1 18 <sup>th</sup> June 2025 |
|         |            |             |                                                                           |

## 1.2 Approvals

| Name               | Title              | Date       | Sign               |
|--------------------|--------------------|------------|--------------------|
| Laurence Alexander | Compliance Officer | 10/01/2025 | Laurence Alexander |
| Laurence Alexander | Compliance Officer | 18/08/2025 | Laurence Alexander |

# 2. Complaint Submission

A Complaint refers to any written expression of dissatisfaction submitted by a player concerning the Company’s services, decisions, terms, or conduct, where the player expresses dissatisfaction and seeks a response or resolution from the Company.

## 2.1 Informal Complaint

An informal complaint is any expression of dissatisfaction made by a player that has not been submitted through the official Complaint Form. Such complaints may be raised through customer support channels or other means and are handled promptly and amicably by the Company without initiating the formal complaint procedure.

## 2.2 Formal Complaint

A formal complaint is a written complaint submitted by a player through the official Complaint Form, providing all required details for the Company to conduct a structured review and resolution process in accordance with this Complaints Procedure.

If a player requests to make a formal complaint on email or livechat they will be provided with the Complaint Form to formally proceed with the process.

## 2.3 Complaint Form

The Complaint Form collects essential information required for the proper assessment and resolution of a player's formal complaint. Players are asked to provide their personal details (name, address, contact information, and registered email), gaming account information, and the nature of their complaint, including the date of the disputed event and the relevant complaint category (such as deposits, withdrawals, bonuses, account closures, or technical issues). Players must also describe the issue in detail and may attach supporting documents to substantiate their claim.

The form is available on the Company's website under the *Complaints* page as a downloadable document and can also be supplied directly by the customer support team upon request. Once completed, the form is submitted to the Company through the designated support email address.

## 2.4 Complaint Window

Players may submit a complaint to the Company free of charge at any time within six months from the date of the disputed bet settlement or the incident giving rise to the complaint.

For complaints relating to in-play or live sports betting, players are advised that although the six-month timeframe applies, it may be necessary to raise such complaints promptly. This is because investigations may rely on time-sensitive data specific to the event, which, due to the nature of live betting, may not be retained beyond a short period where it would be unreasonable for the Company to preserve such data longer.

# 3. Complaint Resolution

## 3.1 Response and Resolution

The Company will provide the player with a written final determination of their complaint. The response will include one of the following:

1. A reasoned final assessment detailing the outcome or resolution of the complaint, supported by evidence where appropriate.
2. A clear explanation of the reasons for not handling the complaint, where applicable.

If additional information is required to fully address the complaint, the Company must request such information within the initial four-week period. Should the player fail to provide the necessary details within that timeframe, the Company may reject the complaint.

If the player remains dissatisfied with the resolution and submits a further complaint, the Company will inform the player of their right to escalate the matter to an independent Alternative Dispute Resolution (ADR) entity.

## 3.2 Response Timeline

Within one week of receiving a formal complaint, the Company will:

- Acknowledge receipt of the complaint in writing to the player.
- Explain the procedure that will be followed in handling and resolving the complaint.
- Inform the player of the typical timeframe within which similar complaints are usually resolve

For complaints relating to Responsible Gaming matters, the Company will, within two days of receiving the complaint undertake the aforementioned steps.

## 3.3 Resolution Timeline

The Company will assess and respond to complaints within four weeks from the date of receipt. If additional time is required due to the complexity of the case or the need for further information, this period may be extended once for an additional four weeks. In such cases, the player will be informed in writing of the extension and the reasons for the delay.

Complaints concerning Responsible Gaming shall be given priority by the Company due to their potential impact on player well-being. The Company will use its best efforts to resolve such complaints within five business days. If additional time is required to reach a fair and informed decision, the player will be notified of the delay, which shall not exceed two weeks. Where the delay results from a lack of or delayed response by the player, the resolution period may be extended by a further two weeks at most.

## 4. Alternative Dispute Resolution

***This Policy will be updated to V1.3 when Alternative Dispute Resolution providers are approved and the escalation requirements come into force***

## 5. Record Keeping and Reporting

The Company will:

1. Submit complaints reports to the Curaçao Gaming Authority (CGA) on **15 January** and **15 June** of each year, covering complaints submitted by players through the official Complaint Form since the previous reporting period.
2. Each report will include a summary of:
  - a. The total number of complaints received.
  - b. The total number of complaints resolved (both upheld and rejected).
  - c. The number of complaints that remain pending or unresolved.
  - d. A breakdown of complaints by category.

- e. The number of complaints referred to an ADR entity.
  - f. The number and details of complaints that have resulted in legal action by players.
3. Ensure full transparency and compliance with all ADR decisions and applicable regulatory updates.
  4. Retain records of unresolved complaints, as well as those escalated to ADR or legal proceedings, for the lesser of five years or the period required by applicable data protection, limitation, or other relevant laws or guidelines.

## 6. Website Content

The information displayed on the Website includes the following:

1. Links and contact details for the Company's customer support team.
2. A description of the information required for submitting a complaint, along with links to the online Complaint Form and/or the downloadable PDF or Word version.
3. Details of the applicable timelines for acknowledgement, response, and resolution of complaints.
4. A clear explanation of the player's right to lodge a complaint, including the right to seek resolution through an independent ADR entity and, where applicable, escalate matters to the regulator. (see *Section 4*)
5. An outline of the ADR process, including an explanation of how an ADR decision may affect the player's right to pursue further legal or judicial recourse. (see *Section 4*)
6. Contact information for the designated ADR provider(s). (see *Section 4*)
7. A clear statement that the Curaçao Gaming Authority (CGA) does not mediate individual disputes, but that players may contact the CGA if they believe the Company has breached applicable regulations.

## **Appendix 1: Reasons for Complaint**

1. Deposit issues
2. Withdrawal issues
3. Bonus terms and conditions
4. Account closures or restrictions
5. Alleged errors or unfairness in game outcomes
6. Responsible gaming issues
7. Treatment of player balances
8. KYC and Verification
9. Data Protection
10. Technical or Software issues
11. AML concerns
12. Issues with minors
13. Fraudulent games
14. Fraudulent practices
15. License or regulation
16. Unfair terms and conditions