

PLAYER COMPLAINTS POLICY

VERSION 2.0

FairGame G.P. N.V.
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1. INTRODUCTION AND PURPOSE OF THIS POLICY

This Player Complaints Policy (the “Policy”) is adopted by FairGame G.P. N.V., a duly licensed online gambling operator under the laws of Curaçao, for the purpose of establishing clear, fair, and transparent procedures for the resolution of player complaints. The objective of this Policy is to ensure that all complaints from players are treated seriously, investigated thoroughly, and resolved promptly and fairly, in accordance with the applicable legal and regulatory framework, including guidance from the Curaçao Gaming Authority (CGA).

2. SCOPE AND APPLICABILITY

This Policy applies to any individual or legal entity (the “Player” or “Complainant”) who has registered an account with the Company and has engaged with the Company's gambling services.

The Policy governs complaints relating to, but not limited to, the following matters:

- Deposit issues;
- Withdrawal issues;
- Bonus terms and conditions;
- Account closures or restrictions;
- Alleged errors or unfairness in game outcomes;
- Responsible gaming issues;
- Treatment of player balances;
- KYC and Verification;
- Data Protection;
- Technical or Software issues;
- AML concerns;
- Issues with minors;
- Fraudulent games;
- Fraudulent practices;
- License or regulation;
- Unfair terms and conditions.

This Policy does not apply to:

- General service inquiries or feedback that does not allege wrongdoing or harm;
- Complaints deemed frivolous, vexatious, or abusive in nature.

3. PROCEDURE FOR SUBMITTING A COMPLAINT

A Player wishing to submit a complaint must do so in writing, providing all relevant details necessary for the Company to initiate a review of the matter. Complaints shall be directed to:

[support@goldenbilly.com]

Each complaint must include at a minimum the following details:

- Use the subject line: "Complaint";
- Full name, surname, and phone number;
- Complaint's place of Residence;
- Complaint's account number (if applicable);
- Date of the Complaint and date of the disputed event;
- Detailed description of the issue and all relevant supporting information;
- Copies of relevant documentation or evidence (e.g., screenshots, emails, transaction history).
- Complaints submitted without sufficient information may be returned to the Player with a request for clarification, which may delay the resolution process.

The form should be available in English and in the language of the website/domain that the player is using.

Company always offer ADR option for the players. ADR option does not restrict the rights of the Player him/herself to take legal action.

4. INTERNAL HANDLING OF COMPLAINTS

Upon receipt of a valid complaint, the Company shall adhere to the following process:

a) Acknowledgement: The Company shall acknowledge the complaint in writing within 1 week of receipt. Exception: Responsible Gaming Complaints - The company shall acknowledge within 2 business days.

b) Investigation: The matter shall be investigated by a qualified member of the Company's compliance or customer support team. The Company commits to conducting the review impartially, in good faith, and with due regard to all available evidence.

c) Resolution and Response: The Company shall endeavor to provide a final written response within 2 weeks of acknowledging the complaint. If, due to complexity or volume of complaints, additional time is required, the Player shall be notified of the revised timeframe.

For responsible gambling compliance, the resolution period should be 5 business days. In the case of an If, due to complexity or volume of complaints, additional time is required, the period cannot exceed 2 weeks, with proper prior notice to the complainant.

d) Closure: Once a final decision has been rendered, the Company shall communicate the outcome in writing, along with an explanation and, where applicable, details of any corrective measures or remedies. If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to an independent ADR entity.

Complaints related to responsible gaming should be prioritized due to potential impacts on player well-being. Complaints should be categorized as related to responsible gaming in any case when it regards targeting of Vulnerable Players, the availability and/or timely implementation of self-exclusion and/or cooling-off and the mandated consequences therein as outlined in the Responsible Gaming policy.

5. REFERRAL TO THE CURAÇAO GAMING AUTHORITY

The CGA does not mediate individual disputes but monitors operator compliance. Players may contact the CGA directly regarding malpractice, breaches of license conditions, or whistleblowing. The company must not restrict such contact.

6. ALTERNATIVE DISPUTE RESOLUTION (ADR) FRAMEWORK

The Curaçao Gaming Authority is in the process of finalizing a formal regulatory framework for recognized Alternative Dispute Resolution (ADR) entities.

The Company fully supports this initiative and hereby confirms its intention to implement and comply with the ADR mechanism once the CGA officially publishes its list of approved ADR providers. Upon the finalization of such framework, the Company shall:

- Appoint and publicly disclose the designated ADR provider(s);
- Provide access to ADR services free of charge to eligible complainants;
- Update this Policy to reflect the procedural details and contact information of the appointed ADR entity.

- Full details of the ADR process will be included in the company's Terms and Conditions.

If a complaint cannot be resolved internally, players are entitled to escalate the matter to an independent ADR provider, free of charge. For avoidance of doubt, the company will bear all costs of the ADR process.

Once ADR process is completed it cannot be recommenced by either the player or the operator with another different ADR entity.

In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future.

Until such time, Players may rely on the internal complaints procedure, and independent mediation platforms.

7. RECORD-KEEPING AND REGULATORY REPORTING

All complaints, including documentation, correspondence, and investigation outcomes, shall be retained securely by the Company for a minimum period of five (5) years.

The company will submit reports to the CGA on January 15th and June 15th based on complaints submitted to the company as operator since the previous reporting period by players using the Complaints Submission Form.

The report includes the following info:

- a. Total number of complaints made.
- b. Total number of settled complaints (upheld and rejected).
- c. Number of pending or unresolved complaints.
- d. Number of complaints by category.
- e. Number referred to ADR.
- f. Number and detail of complaints for which a player has taken legal action.

The Company shall report to the CGA any significant or unresolved complaints and provide supporting records upon regulatory request.

8. TERMS AND CONDITIONS

The Complaint procedure statement of the Company should always be visible and accessible on the company's website as a standalone link or document.

The complaints procedure is also outlined in the Terms and Conditions.

Information should include the following information as a minimum:

- Links to customer service and information on how to contact the operator.
- Detail of information required for a player to make a complaint and links to either/both either the online form or the downloadable PDF/Word document.
- Timelines for responses and resolution.
- Player rights to complain including explicit rights to ADR services and regulatory escalation.
- An explanation of the potential consequences of the relevant ADR entity's decision, and the manner in which this will affect the player's right to further legal and judicial recourse.
- Details of the ADR process and player rights.
- Contact information for the ADR provider(s)
- Clear information that the CGA does not mediate in individual disputes, but if the player feels the operator is in breach of regulations that the player may contact the CGA.

9. DATA PROTECTION AND CONFIDENTIALITY

All complaints shall be handled in compliance with applicable data protection legislation, including the General Data Protection Regulation (GDPR) where applicable.

Information received in the context of a complaint will be used solely for the purposes of complaint handling and regulatory compliance, and will not be shared with third parties except as required by law or with the Player's consent.

10. RESPONSIBLE GAMBLING AND PLAYER PROTECTION

Should a complaint raise concerns of gambling-related harm, addiction, or signs of vulnerable player behavior, the Company shall take appropriate safeguarding actions, including but not limited to:

- Temporary suspension of the Player's account pending further review;
- Provision of responsible gambling tools and resources;
- Communication of self-exclusion options and external support services.

11. REVIEW AND AMENDMENTS TO THE POLICY

This Policy shall be reviewed at least annually and may be amended from time to time to reflect changes in regulatory requirements, industry best practices, or internal governance standards.

The most current version shall be published on the Company's official website.

12. CONTACT INFORMATION

For all inquiries related to this Policy or to submit a complaint, Players may
contact: [support@goldenbilly.com]