
PLAYER COMPLAINTS POLICY

KING ENTERPRISES N.V.

POLICY OWNER: KING ENTERPRISES N.V.

APPROVER: VASIL TONCHEV

DATE APPROVED: MAY 10, 2026

REVIEW FREQUENCY: ANNUALLY

NEXT REVIEW DATE: MAY 10, 2027

SECURITY CLASSIFICATION: CONFIDENTIAL

TABLE OF CONTENTS

SCOPE AND PURPOSE.....	4
PLAYER COMPLAINTS AND DISPUTE RESOLUTION	5
COMPLAINT SUBMISSION AND HANDLING	5
RESPONSIBLE GAMING RELATED COMPLAINTS.....	6
PEER-TO-PEER AND POKER EVENT COMPLAINTS.....	6
LIVE BETTING AND TIME-SENSITIVE COMPLAINTS.....	7
COMPLAINT REVIEW AND ESCALATION	7
POKER INTEGRITY, COLLUSION, BOT, AND GAMEPLAY COMPLAINTS	8
FINAL DETERMINATION OF COMPLAINTS.....	8
ALTERNATIVE DISPUTE RESOLUTION (ADR)	9
COMPLAINT RESOLUTION TIMEFRAMES	9
COMPLAINT REPORTING AND RECORD RETENTION	10

King Enterprises N.V. is committed to handling player complaints and disputes fairly, consistently, and transparently, in line with applicable Curaçao laws, regulatory expectations, and requirements issued by the Curaçao Gaming Authority (“CGA”). As outlined in this Player Complaints Policy (referred to as “the Policy”), we maintain structured procedures to receive, acknowledge, investigate, and resolve player complaints within defined timeframes, issue a final written determination, facilitate escalation to Alternative Dispute Resolution (“ADR”) where applicable, and ensure appropriate reporting, record retention, and readiness to provide complaint-related records to the CGA upon request.

SCOPE AND PURPOSE

This Policy applies to all individuals associated with King Enterprises N.V., including employees, agency personnel, temporary and permanent staff, interns, and any third parties acting for or on behalf of the Company who may receive, handle, review, investigate, resolve, or escalate player complaints.

The purpose of this Policy is to define King Enterprises N.V.’s:

- Framework for receiving, acknowledging, reviewing, investigating, and resolving player complaints and disputes in a fair, consistent, and transparent manner;
- Standards and timeframes for complaint handling, including Responsible Gaming related complaints, peer-to-peer and poker event complaints, and time-sensitive complaints (such as live betting);
- Requirements for issuing a final written determination and, where applicable, informing players of escalation options to Alternative Dispute Resolution (“ADR”) or other competent mechanisms; and
- Reporting and recordkeeping obligations related to complaints, including periodic reporting to the CGA (where required) and maintaining complaint-related records so they remain readily available for regulatory review.

The principles and standards set out in this Policy are intended to protect players, support the integrity and fairness of our products and services, and enable effective regulatory oversight, including the CGA’s right to request access to complaint-related records and pending disputes at any time.

This Policy should be read in conjunction with the procedures and controls relevant to your role and responsibilities. If you are uncertain about the appropriate course of action, unable to comply with any aspect of this Policy, or require clarification, you must promptly consult the Compliance Officer or the designated complaints handling function.

PLAYER COMPLAINTS POLICY - KING ENTERPRISES N.V.

A lack of understanding of the Policy or related procedures will not constitute an acceptable excuse for non-compliance.

Failure to comply with this Policy may expose the Company to significant financial, legal, regulatory, and reputational risk, including regulatory sanctions, fines, or enforcement action, and may also result in disciplinary measures.

PLAYER COMPLAINTS AND DISPUTE RESOLUTION

We are committed to handling player complaints fairly, consistently, and transparently, and within reasonable operational and regulatory timeframes.

Complaints may include:

- Account-related disputes;
- Payment disputes;
- Promotional disputes;
- Responsible gaming concerns;
- Gameplay disputes;
- Poker tournament disputes;
- Fraud-related concerns;
- Security concerns;
- Gameplay integrity concerns.

Only the registered account holder may submit a complaint, dispute, or claim relating to their account or activity.

COMPLAINT SUBMISSION AND HANDLING

Players may submit complaints, disputes, or concerns in writing through our designated customer support or complaints handling channels, including support@pokerking.com.

We acknowledge receipt of complaints within two (2) business days where reasonably practicable.

We reserve the right to request supporting documentation, transactional information, screenshots, gameplay details, communication records, hand histories, device information, payment information, or any other information reasonably necessary to investigate and resolve complaints.

We reserve the right to delay, suspend, extend, escalate, or reopen complaint investigations where additional fraud analysis, gameplay integrity review, technical

investigation, security review, regulatory review, or third-party dependency review is required.

Where complaint investigations require extended review periods, we may notify the player of the delay and provide updated status information where reasonably practicable.

Where delays result from a player's failure to provide requested information or documentation, we reserve the right to extend the review period for an additional reasonable period or close the complaint where the requested information is not provided.

RESPONSIBLE GAMING RELATED COMPLAINTS

Responsible Gaming related complaints may be reviewed and handled by designated responsible gaming, compliance, customer support, security, or other relevant internal personnel depending on the nature of the concern.

Where reasonably practicable, we acknowledge receipt of Responsible Gaming related complaints in writing within two (2) business days and may request additional information or documentation necessary to review the matter appropriately.

Responsible Gaming related complaints may involve account reviews, responsible gaming assessments, account restriction reviews, communication reviews, customer interaction reviews, or other internal review procedures considered appropriate based on the nature of the complaint.

We aim to resolve Responsible Gaming related complaints within a reasonable timeframe, and where reasonably practicable, within an average period of ten (10) business days.

Where additional review time is required, we may notify the player of the delay and extend the review period for up to an additional two (2) weeks where reasonably necessary based on the complexity of the matter, security considerations, customer protection considerations, or regulatory obligations.

Where delays result from a player's failure, refusal, or delay in providing requested information or documentation, we may extend the review period for an additional period of up to two (2) further weeks where reasonably necessary to complete the review process.

PEER-TO-PEER AND POKER EVENT COMPLAINTS

For peer-to-peer gaming, poker tournaments, multiplayer gameplay, transfers, and similar gameplay events, the applicable complaint period shall commence upon settlement,

completion, or official conclusion of the relevant event, transaction, tournament, or gameplay activity.

Players are encouraged to submit complaints relating to gameplay integrity, collusion, chip dumping, gameplay abuse, account compromise, or tournament disputes as soon as reasonably possible following the relevant event.

We reserve the right to review gameplay data, hand histories, device information, transactional records, gameplay patterns, security information, behavioral indicators, and related account activity in connection with such investigations.

LIVE BETTING AND TIME-SENSITIVE COMPLAINTS

Complaints relating to live betting, in-running wagering, time-sensitive gameplay events, or rapidly settling events may be submitted within six (6) months following settlement of the relevant event.

However, due to the time-sensitive nature of certain gameplay events, we strongly encourage players to submit complaints as soon as reasonably possible following settlement of the relevant event.

Investigations relating to live betting, in-running wagering, or other time-sensitive events may depend upon the availability of gameplay data, technical information, third-party provider information, transactional evidence, or other operational records relevant to the review process.

COMPLAINT REVIEW AND ESCALATION

We apply internal complaint review and escalation procedures designed to assess complaints fairly, consistently, proportionately, and in accordance with operational, fraud prevention, gameplay integrity, responsible gaming, and compliance considerations.

Certain complaints may be escalated for additional review by supervisory personnel, fraud prevention personnel, compliance personnel, responsible gaming personnel, security personnel, gameplay integrity personnel, or other designated internal teams where appropriate.

We may prioritize complaints involving:

- Responsible gaming concerns;
- Vulnerable customers;
- Fraud or security risks;
- Accounting compromise concerns;

- Payment disputes;
- Gameplay integrity concerns;
- Collusion or cheating concerns;
- Regulatory or compliance concerns.

POKER INTEGRITY, COLLUSION, BOT, AND GAMEPLAY COMPLAINTS

We maintain procedures designed to investigate reports relating to collusion, cheating, bot usage, Real-Time Assistance (“RTA”), chip dumping, fraudulent gameplay, automated gameplay, gameplay manipulation, bonus abuse, prohibited software use, unfair advantage practices, or other conduct that may compromise gameplay integrity.

We reserve the right to review gameplay data, hand histories, device information, transactional activity, behavioral indicators, security information, gameplay patterns, communications, and related account activity in connection with such investigations.

Where we determine that prohibited conduct, abuse, fraud, gameplay manipulation, or gameplay integrity violations may have occurred, we reserve the right to:

- Restrict or suspend accounts;
- Freeze, withhold, or confiscate funds or winnings where permitted;
- Void gameplay results or tournament outcomes;
- Reverse promotional benefits;
- Terminate customer relationships;
- Report relevant activity to competent authorities where applicable.

FINAL DETERMINATION OF COMPLAINTS

We provide players with a final written determination following completion of our complaint review and investigation process.

Final determinations may include the outcome of the complaint review, relevant reasoning supporting the decision, references to applicable terms, policies, gameplay records, transactional information, technical findings, or other information reasonably relevant to the resolution of the complaint where appropriate.

Where a complaint cannot be processed, reviewed, or resolved due to missing, incomplete, inconsistent, or unavailable information, we may notify the player of the additional information or documentation required to continue the review process.

Requests for additional information may be issued during the initial complaint review period. Where the requested information or documentation is not provided within four (4)

weeks from the date of the request, we reserve the right to reject, suspend, close, or discontinue the complaint review process.

Where reasonably applicable, final determinations may also include information relating to the player's right to escalate the matter to an Alternative Dispute Resolution ("ADR") entity or other competent authority where available under applicable law or regulatory requirements.

ALTERNATIVE DISPUTE RESOLUTION (ADR)

Where a player remains dissatisfied following completion of our internal complaints process, the player may be entitled to escalate the matter to an independent Alternative Dispute Resolution ("ADR") entity or competent authority where applicable.

Our final determination may include:

- The outcome of the investigation;
- The basis for the decision;
- Relevant supporting information where appropriate;
- Any remaining escalation rights available to the player.

Where a player initiates or escalates a complaint to ADR and subsequently abandons, withdraws, or fails to pursue the ADR process, we reserve the right to consider the matter closed and not subject to reopening except where required.

COMPLAINT RESOLUTION TIMEFRAMES

We aim to review and resolve complaints within reasonable operational and regulatory timeframes.

Resolution timelines may vary depending on:

- Complexity of the matter;
- Availability of evidence;
- Fraud or security investigations;
- Technical investigations;
- Third-party dependencies;
- Gameplay integrity reviews;
- Regulatory or compliance considerations.

Certain investigations may require extended review periods where necessary to ensure fairness, security, compliance, operational integrity, or accurate investigation outcomes.

COMPLAINT REPORTING AND RECORD RETENTION

We maintain records relating to complaints, investigations, escalations, resolutions, communications, evidence, gameplay reviews, fraud reviews, security investigations, and related materials for operational, regulatory, audit, fraud prevention, responsible gaming, security, and compliance purposes.

We maintain records and registers relating to unresolved, pending, escalated, or externally reviewed complaints and investigations.

We will prepare and submit periodic complaints reporting to the Curaçao Gaming Authority (“CGA”) on January 15 and June 15 of each calendar year, or as otherwise required by applicable regulatory obligations.

Such reporting may include, without limitation:

- Total complaints received;
- Complaint categories;
- Complaint outcomes;
- Complaints upheld or rejected;
- Pending or unresolved complaints;
- Escalated complaints;
- Responsible gaming complaints;
- Fraud or security-related complaints;
- Gameplay integrity complaints;
- Complaints referred to ADR or external escalation;
- Complaints involving legal or external proceedings.

Such records shall be retained for the lesser of five (5) years following closure of the complaint, investigation, customer relationship, or related proceeding, or such shorter retention period as may be required under applicable data protection laws, legal limitation periods, or other applicable regulatory obligations.

We maintain complaint-related records, investigations, communications, and supporting materials in a manner designed to facilitate lawful access, review, inspection, or supervisory requests from competent regulatory or supervisory authorities where required or permitted.

We reserve the right to provide complaint-related records, investigations, communications, supporting materials, or related information to the Curaçao Gaming Authority (“CGA”) or other competent regulatory, supervisory, or governmental authorities where required or permitted under applicable law or regulatory obligations.

PLAYER COMPLAINTS POLICY - KING ENTERPRISES N.V.

The CGA may request access to complaint-related records, pending disputes, investigations, escalations, communications, or related materials at any time, and we shall ensure that such records remain readily available at all times for regulatory review, inspection, supervisory oversight, or compliance purposes.