

Player Complaints Policy

Policy Overview

Horizonix Corp N.V. (hereinafter referred to as “the Operator”), hereby establishes and implements this Player Complaints Policy the procedural framework for the handling and resolution of player complaints and disputes, ensuring a process that is transparent, equitable, and efficient, in accordance with the provisions set forth under Article 5.3 of the *National Ordinance on Games of Chance* (Landsverordening op de Kansspelen, LOK).

Compliance with this Complaints Policy is mandatory pursuant to the LOK, and any breach thereof shall be subject to oversight and enforcement measures by the Curaçao Gaming Authority (CGA), as part of its supervisory mandate.

This Policy ensures that players are granted access to a clear and effective complaints mechanism, which includes the availability of cost-free alternative dispute resolution (ADR) services. Such services shall uphold the principles of quality, impartiality, and independence. Pursuant to Article 5.3 of the LOK, the CGA may issue supplementary rules, policies, and guidelines governing the complaints and ADR framework.

The implementation and ongoing management of this Complaints Policy shall be entrusted to the designated Compliance Role representative of the Operator.

Procedure for Complaints

Submitting a Complaint

1. Lodging of Complaints

Players shall have the right to submit a complaint free of charge within a period of six (6) months from the date of the incident giving rise to the complaint, provided such incident arises from participation in a game of chance. In the case of peer-to-peer (P2P) gaming (including poker) or ante-post fixed-odds betting, the six-month limitation period shall commence upon conclusion of the relevant event, rather than at the time the wager was placed.

2. Submission Procedure

Complaints must be filed in accordance with a clearly defined procedure, which shall be made readily accessible on the Operator’s official website. This procedure shall include either an online complaint submission form or a downloadable template (in Word or PDF format) which may be submitted via email. The complaints submission process shall be explicitly referenced in the Operator’s Terms and Conditions, and the complaint form shall conform to the specifications and requirements set forth by the Curaçao Gaming Authority (CGA).

3. Required Information

The complaint form must include the following mandatory elements:

- a. Full name, residential address, and domicile of the complainant.
- b. Player account number (if applicable).
- c. Date on which the complaint is submitted.
- d. A detailed description of the disputed matter, including reference to the relevant category or topic, if such classifications are defined.
- e. The language of the complaint, which must be either English, Dutch, or Papiamentu, in accordance with the LOK. The Operator reserves the right to accept complaints in other languages relevant to its target markets; however, official review and resolution shall be conducted solely in one of the aforementioned official languages.
- f. Any supporting documentation the complainant wishes to provide in substantiation of the complaint.

Complaint Resolution – Responsible Gaming

Complaints concerning Responsible Gaming matters shall be afforded priority due to the potential risk to player welfare. The Operator shall address such complaints in accordance with the Responsible Gaming Policy as issued by the CGA. All complaints falling within the ambit of said policy shall be deemed subject to this provision. The Operator shall make reasonable best efforts to resolve Responsible Gaming complaints within five (5) business days. Where resolution within this timeframe is not feasible, the complainant shall be duly notified of the delay. In all cases, resolution must be concluded within a maximum period of two (2) weeks from the date of complaint submission.

Complaint Resolution – General

Acknowledgement

Within one week of receiving a complaint, the operator will:

1. Confirm receipt of the complaint in writing via email or preferred communication method.
2. Provide an explanation of how the complaint will be processed.
3. Expected timeline for resolution.

Response and Resolution

The operator will assess and respond to complaints within four weeks. If necessary due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the complainant.

A player will always receive a final determination of their complaint in writing.

The response will be either:

1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
2. Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the operator will request this information within the initial four week time period. Should the complainant not provide the necessary information within that time period, the operator may reject the complaint.

Where for any reason the operator does not or is unable to resolve an issue to the player's satisfaction, the player is informed that the matter may be escalated by the player to an independent ADR entity.

Alternative Dispute Resolution (ADR)

Access to ADR

1. In compliance with its licensing obligations under the National Ordinance on Games of Chance (LOK), the Operator shall make available to its players access to independent Alternative Dispute Resolution (ADR) services.
2. The Operator is required to upload to the Curaçao Gaming Authority (CGA) Portal a signed agreement with no fewer than one (1) ADR entity certified by the CGA. This submission must be completed within one (1) calendar month following the publication of the list of Certified ADR Providers on the official CGA website.
3. In instances where a complaint cannot be resolved through the Operator's internal complaint resolution mechanism, the player shall have the right to refer the matter to an independent ADR provider. This referral shall be at no financial cost to the player,

with the Operator assuming full responsibility for all fees and expenses associated with the ADR process.

4. The Operator shall ensure that the contact details of the designated ADR provider are clearly disclosed in all written communications concerning complaints, as well as within the Terms and Conditions published on the Operator's official website.
5. While the CGA does not mandate the use of ADR services by players as a condition of escalation, the Operator reserves the right, at its sole discretion, to establish such a requirement within its own Terms and Conditions.

Legal proceedings

Any complaints escalated to legal proceedings will be subject to Curaçao law, and disputes will be resolved by the courts of Curaçao, as stipulated in the gaming agreement per Article 5.5 of the LOK.

Escalation to the Regulatory Authority

The CGA does not intervene in or adjudicate individual player complaints concerning gambling-related transactions. The Operator shall clearly communicate this limitation within its Complaints Procedure and/or the Terms and Conditions published on its website.

Notwithstanding the above, if a player reasonably believes that the Operator has acted in breach of the applicable regulatory framework, including but not limited to the provisions of the LOK, the player may submit a report to the CGA. Such reports shall be made exclusively through the designated online submission form available on the official CGA website.

Although the CGA will not mediate or render decisions in individual disputes, it may consider the information submitted in support of its broader supervisory, investigative, and enforcement functions.

Player Support and Reporting

Contact Points

Players may submit complaints via one or more of the following:

1. Email;
2. Online form.

Record-Keeping

1. Operator keeps a log of all complaints, including those;
 - a. Resolved internally (whether upheld or rejected);
 - b. Unresolved;
 - c. Escalated to ADR;
 - d. Escalated to legal proceedings;
2. All complaint records will be securely maintained for at least five years under the National Ordinance on Games of Chance and applicable Curaçao data protection laws, including details of unresolved and complaints that have been escalated to ADR or legal proceedings.

Regulatory Reporting

The operator will:

1. Submit reports to the CGA on January 15th and June 15th and every year, summarizing the following:

- a. Total number of complaints made;
- b. Total number of complaints closed (settled and rejected);
- c. Number of pending or unresolved complaints;
- d. Number of complaints by category;
- e. Number referred to ADR and the subsequent outcomes of each;
- f. Number and detail of complaints for which a player has taken legal action;
2. Ensure transparency and compliance with ADR decisions and regulatory updates.
3. The CGA reserves the right to request, at any time, access to records of any and all complaints received as well as any disputes that are pending resolution.

Reasons for Complaint

The player has the right to make a complaint regarding any part of their relationship with the operator or any incident related to their participation in a game of chance. This includes (but is not limited to):

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.

Signed This 05th day of May 2025

A handwritten signature in black ink, consisting of a stylized 'S' or 'B' shape with a horizontal line through it, positioned above a solid horizontal line.

Director: Ecorpp Management N.V.