

Player Complaints Policy

Key Information

Approving Official(s): Director

Responsible Office: AE Group B.V.

Effective Date: 01.12.2025

Next Review Date: In three years or if business needs occur.

1. Policy Overview

This Player Complaints Policy outlines the process for receiving, handling and resolving player complaints in compliance with the National Ordinance on Games of Chance (LOK) and the requirements of the Curacao Gaming Authority (CGA). The purpose of this policy is to ensure that all complaints are handled fairly, transparently and within set timeframes, that players have access to a complaints process including free access to independent Alternative Dispute Resolution (ADR) as required by CGA, and that records of complaints are maintained and reported to the CGA in line with regulatory obligations. This policy applies to all registered players of the Operator.

2. Definitions

For the purposes of this policy, a **player interaction** is any written communication from a player to the Operator's support team. A **complaint** is a written expression of dissatisfaction about the Operator's services, terms or decisions where the player expects a response or resolution. A **dispute** is a complaint that has not been resolved through the Operator's internal process and is escalated to an independent ADR provider or a court.

3. Complaint Submission Process

3.1 Submission Window

Players may lodge a complaint within six (6) months of the settlement of the bet or the incident in question.

3.2 Submission Channels

Complaints may only be submitted by the registered account holder. They must be made in writing and can be sent through the Operator's customer support channels or by using the Complaint Submission Form available on the website. The form requires:

1. Player's name and address
2. Account number (if applicable)
3. Date of complaint and disputed event
4. Description of the issue
5. Supporting documentation

3.3 Escalation Stages

All complaints are first reviewed by the customer support team. If the matter cannot be resolved, it is escalated to the customer service manager, and if still unresolved, to senior management. If no final resolution is reached, the player may have the option to escalate the case to a court or an independent ADR provider, as required by the CGA. The CGA does **not** resolve individual player complaints but still can be contacted.

4. Complaint Resolution Process

Complaints related to responsible gaming are treated as a priority and the Operator aims to confirm receipt in 2 business days and resolve them within 5 business days. All other complaints are acknowledged within 1 week and resolved within 4 weeks. If more time is needed due to complexity, the Operator may extend the resolution period once, up to an additional 4 weeks, with written notice to the player. A final reasoned response will be provided in writing, and if the player remains unsatisfied, the complaint may be escalated to a court or an ADR.

5. Alternative Dispute Resolution (ADR)

If a complaint cannot be resolved internally, the player may escalate the matter to a court or an independent Alternative Dispute Resolution (ADR) provider certified by the Curacao Gaming Authority for free, once a list of providers is published by CGA. Once the ADR process has been completed, it cannot be restarted with another provider.

6. Record-Keeping and Reporting

The Operator keeps records of all complaints, including outcomes and any cases escalated to legal proceedings or ADR, for a minimum of 5 years or as required by law. The Operator submits bi-annual reports to the CGA on complaints received, their status, and any referrals to external service like ADR.

7. Terms and Conditions

This Complaints Policy is published on the Operator's website and referenced in the General Terms and Conditions. The Terms and Conditions include details on how players can submit a complaint, the timelines for responses, the right to escalate to court or ADR, and the role of the Curacao Gaming Authority.

8. Reasons for Complaint

Players may submit complaints concerning deposits, withdrawals, account restrictions, responsible gaming measures, and the handling of player balances. Complaints will only be considered where they relate to matters under the Operator's control. The Operator is not

responsible for the performance or content of third-party games supplied by independent providers, for bonus terms and conditions which are clearly published and accepted by the player upon registration, for technical issues or downtime caused by external providers or circumstances beyond the Operator's reasonable control, for general allegations of fraud without specific evidence, or for matters already covered by other policies and terms which the player has accepted during registration.

9. Transition Deadline

This Player Complaints Policy must be published on the Operator's website and uploaded to the Curacao Gaming Authority portal no later than 31 July 2025.

AE GROUP B.V.

Mitko Todorov:

