

Apollo Sync B.V.

Player Complaints Policy

Policy Overview

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

Adherence to this Complaints Policy is considered a requirement under the LOK and failure to comply will be addressed by the Curaçao Gaming Authority (CGA) in accordance with its monitoring and enforcement procedures.

The Complaints Policy guarantees players access to a straightforward and effective dispute resolution process. Execution of this Complaints Policy is the responsibility of the operator and supervised by the Compliance Officer of the Company.

Procedure for Complaints

In the first instance, the Company must offer customer support to players via email and/or live chat prior to the formal submission of a Complaint Submission Form.

Filing Timeline

Players may lodge a complaint free of charge within six (6) months of the incident. In the case of P2P games (such as poker) or ante-post fixed odds betting, this six-month timeline begins after the bet settlement or conclusion of the specific event, rather than the placement of the wager.

Complaints must be submitted via an online form or downloadable Word/PDF form, clearly linked on the website and Terms and Conditions. Required information includes: complainant's name, address, and place of residence, account number (if applicable), date of the complaint and date of the disputed event, description of the conduct being disputed (using a selection of pre-determined category topics if/as applicable), and any supporting documents. Complaints may be submitted in English, Dutch, or Papiamentu and, where the relevant player-facing website is operated in another language, the complaint

form shall also be available in that website language.

Eligibility to Make a Complaint

Complaints may only be submitted by the registered player who holds the account to which the complaint relates.

Anonymous complaints will not be accepted. The player must provide their account number and registered name as part of the complaint submission.

Players are not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the Company. Complaints can only be made by the registered player.

In-Running (Live) Sports Betting Complaints

In-running sports betting complaints remain subject to the general six-month complaint period. Players are nevertheless encouraged to submit such complaints promptly because certain live-event data may only be retained for a limited period. Where relevant third-party live-event data is no longer available despite reasonable retention measures by the Company, the Company may be limited in its ability to investigate fully.

Complaint Resolution - Responsible Gaming

Responsible gaming complaints are prioritised due to potential impacts on player well-being. Complaints shall be categorized as related to responsible gaming in any case when they regard the targeting of Vulnerable Players, the availability and/or timely implementation of self-exclusion and/or cooling-off periods, and the mandated consequences therein as outlined in the Company's Responsible Gaming policy.

The Company must use its best efforts to resolve these cases within five (5) business days. Within two (2) days of receiving a complaint, the Company will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

If more time is needed by the Company to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed an additional four (4) weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended accordingly, in accordance with CGA guidelines.

Use of Artificial Intelligence (AI): Communications relating to Responsible

Gaming complaints, complaints escalated to ADR, complaints involving minors, fraud, AML/CFT, account closure, or any complaint assessed as complex or sensitive shall be handled by appropriately trained human personnel and not exclusively by automated systems.

Complaint Resolution - General

Acknowledgement: Within two (2) business days of receipt, operators confirm receipt of the complaint in writing, provide an explanation of how the complaint will be processed, and provide notice of the average timeline for resolution.

Resolution: Complaints are resolved 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 player.

If detailed reasons for not handling the complaint are given, the Company must have requested necessary additional information within the initial four-week period. If the player is unsatisfied with the final resolution and makes a further complaint to that effect, the Company will explicitly inform the player that they may escalate the matter to an independent ADR entity.

Alternative Dispute Resolution (ADR)

Operators must contract with at least one CGA-certified ADR provider and upload the agreement to the CGA Portal within one month of the publication of the Certified ADR Providers on the official website. The Company has contracted with EGIS, a CGA-certified ADR entity, to handle disputes escalated by players.

ADR contact details:

Name: EGIS (egis-adr.com)

Website: egis-adr.com

Email: info@egis.io

The Company bears all costs of the ADR process. Players are not charged for submitting a dispute to the ADR provider. Where the Company has contracted with more than one CGA-certified ADR provider, the player has the right to choose which ADR provider to submit their complaint to. ADR contact details must be included in all written communications to players regarding the outcome of their complaint and in these Terms and Conditions.

All alternative dispute resolution (ADR) services must be conducted by an independent CGA-certified ADR provider. There must be no conflict of interest between the ADR team and either party to the dispute.

Finality of ADR Process

Once an ADR provider has issued a final decision in relation to a dispute, the same dispute may not be re-submitted to a different ADR provider. This does not limit either party's right to seek relief before a court of competent jurisdiction, except to the extent otherwise agreed or required by law.

Player Withdrawal from ADR

Where a player withdraws from ADR or fails to respond within the timeframe set by the ADR provider, the dispute may be closed in accordance with the ADR provider's procedural rules. Any possibility of recommencement shall be governed by those rules and by applicable law.

Compliance with ADR Decisions

The Company is committed to full transparency and compliance with decisions issued by CGA-certified ADR providers. Specifically:

- The Company will implement ADR decisions promptly and in full
- Where an ADR decision requires payment to a player, the Company will make such payment within 10 (ten) business days of receiving the ADR decision
- Where the Company disagrees with an ADR decision, it may pursue legal remedies through the courts but shall not withhold compliance pending the outcome of any such proceedings unless ordered to do so by a court of competent jurisdiction
- The Company shall monitor changes to CGA ADR regulations and update this Policy accordingly
- The Compliance Officer is responsible for ensuring adherence to this requirement and shall report any failure to comply to the Managing Director immediately

ADR Provider Reporting Requirements

The Company acknowledges that CGA-certified ADR service providers have their own reporting requirements in accordance with the Alternative Dispute Resolution Policy issued by the CGA. The Company will cooperate fully with the ADR provider to facilitate compliance with these reporting obligations, including by providing the ADR provider with timely access to all relevant complaint data, records and documentation as requested.

Authority Escalation

The CGA is not the primary forum for resolving ordinary player transaction disputes. Players may nevertheless contact the CGA regarding licensing concerns, regulatory misconduct, malpractice, or whistleblowing matters. Nothing in this Policy limits a player's right to contact the CGA.

Players should note that the CGA's role is regulatory oversight, not individual dispute resolution. Complaints about individual transactions, game outcomes, bonuses, or account decisions should be directed to the Company's internal complaints process and, if unresolved, to the Company's CGA-certified ADR provider as set out above. The ADR process is free of charge for players.

Player Support and Reporting

Complaints may be submitted by email support@apolosync.vip or online form. The Company shall maintain records of all complaints, including unresolved complaints and complaints escalated to ADR or legal proceedings, for a minimum of five (5) years, or for any longer period required by applicable law, regulatory requirement, limitation period, litigation hold, ADR process, or CGA/FIU instruction or request.

Periodic Reporting Requirements

The Company shall submit complaints reporting to the CGA in the form, frequency, and deadlines prescribed by the CGA from time to time.

- (a) Total number of complaints received.
- (b) Total number of settled complaints, broken down by: complaints upheld (decided in favour of the player) and complaints rejected (decided in favour of the operator).
- (c) Number of complaints pending or unresolved at the end of the reporting period.
- (d) Number of complaints by category (e.g., deposits, withdrawals, bonuses, account status, game fairness, responsible gaming, KYC, AML, data protection, software issues, minors, fraud, licensing).
- (e) Number of complaints referred to an ADR provider.
- (f) Number and details of complaints for which a player has taken or threatened legal action against the Company.

The CGA may request access to all complaint records at any time. The Company shall make all records available within 5 (five) business days of such a request.

Terms and Conditions

Complaint procedures must be clearly visible on the website and included in Terms and Conditions. Information must include: contact links, complaint submission details, response timelines, rights to ADR and regulatory contact, ADR process and CGA disclaimer.

Except if mutually agreed under specific terms of ADR, the Company does not restrict the rights of the player to take legal action. The Terms and Conditions will include 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.

Please note: Complaints are subject to this Player Complaints Policy, which governs all complaint submission timelines and resolution procedures. Players may submit a complaint within six (6) months of the relevant incident.

Reasons for Complaint

Players can complain about any aspect of their experience, including: deposits, withdrawals, bonuses, account status, game fairness, responsible gaming, balances, KYC, data protection, software issues, AML, minors, fraudulent games, fraudulent practices, licensing concerns, and unfair terms and conditions.

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by several vertical strokes and a long, sweeping diagonal line extending upwards and to the right.