

Player Complaints Policy
of Klavitorix B.V.
Version 1.1.

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1. Introduction

This Player Complaints Policy (the “Policy”) sets out the procedures followed by Klavitorix B.V. (the “Company”) for receiving, reviewing, and resolving complaints submitted by players. It has been created in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

The Policy applies to any complaint raised by a player concerning their experience with the Company, the services provided, or their participation in games of chance offered by the Company.

2. Complaint Management Process

2.1. Definition of a Complaint (Incident)

A complaint (also referred to as an “incident”) is defined as any situation in which a player believes that an event, action, omission, or system behavior has negatively impacted their gameplay experience or relationship with the Company.

Typical reasons for complaints include (but are not limited to):

- Problems with deposits, withdrawals, or payment failures;
- Disputes regarding bonuses, game results, or bet settlements;
- Account restrictions, closures, or suspensions;
- Technical issues that interrupt gameplay or access to the platform;
- Concerns regarding data privacy or Responsible Gaming practices;
- Allegations of unfair treatment or breaches of terms and conditions.

2.2. Submitting of a Complaint

Players may submit a complaint free of charge within six (6) months of the incident in question.

For P2P games (like poker) or ante-post betting, the six-month limit to file a complaint starts only after the bet is settled or the event ends, not when the bet was placed. If you have a complaint about live (in-running) betting, you still have

six months to submit it. However, we advise you to act quickly, as the investigation may depend on specific live data that is time-sensitive due to the nature of in-running betting.

By submitting a complaint directly to the Company, the player confirms that the matter is not currently under review by a third party (including ADR bodies, regulatory authorities, or legal counsel). All complaints must be submitted using the official online complaint form, available under the “Complaints” section of the website. A direct link is also included in the Terms and Conditions.

Each complaint must include the following:

- Player’s full name, address, and country of residence;
- Email address;
- Date of submission;
- Detailed description of the issue, including category where applicable;
- Preferred language for communication;
- Any relevant supporting documentation;
- Type of complaint being submitted

Incomplete or vague complaints may result in delays in processing.

2.3. Complaint Acknowledgement

Upon receipt of a valid complaint, the Company will provide written acknowledgment within 7 (seven) calendar days. This response will confirm:

- That the complaint has been received;
- An outline of how the issue will be reviewed;
- The estimated timeframe for resolution.

2.4. Complaint Resolution

The Company aims to resolve complaints within 4 (four) weeks of receipt. If the complaint requires more time due to its complexity, or if additional information is required from the player, the resolution period may be extended by up to an additional 4 (four) weeks. In such cases, the player will be informed in writing.

The Company’s final response will include:

- A clear and detailed explanation of the outcome;

In cases of rejection, the reasons for the decision.

2.5. Responsible Gaming Complaints

Complaints that relate to Responsible Gaming issues are handled with the highest level of urgency and care. These cases are prioritized and addressed in accordance with applicable responsible gambling principles and policies.

For complaints related to Responsible Gaming, the Company will confirm receipt in writing within 2 (two) days of receipt of the complaint, providing an explanation of the investigation process and an average resolution timeline. While the Company aims to resolve Responsible Gaming cases within 5 (five) business days, if more time is required to make an informed decision, the player will be notified of a delay which cannot exceed 2 (two) weeks. However, if the delay is caused by the player's slow response, the period may be extended by up to an additional 2 (two) weeks.

3. Alternative Dispute Resolution (ADR)

If a player is dissatisfied with the outcome of a complaint or if it remains unresolved, they have the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider.

Finality of ADR decisions:

Once the ADR process is completed, neither the player nor the Company has the right to restart or recommence the same dispute with a different ADR entity.

Dropped ADR processes:

If a player starts an ADR process but later decides to drop out or stops participating, they lose the right to reopen or resurface the same dispute in the future.

The Company will enter into a formal agreement with a certified ADR provider once the official list of such providers becomes available. ADR services will be offered to players free of charge.

Contact information for the ADR provider will be made available on the Company's website and in the Terms and Conditions once finalized.

The Company will ensure compliance with all ADR decisions and any subsequent regulatory updates

4. Escalation to the Curaçao Gaming Authority (CGA)

If a player believes that the Company has breached applicable laws or regulatory obligations, they may submit a complaint to the Curaçao Gaming Authority (CGA) using the online reporting form available on the CGA's official website. The CGA does not handle disputes related solely to the outcome of games, financial transactions, or general service dissatisfaction.

5. Record-Keeping and Reporting

The Company maintains a secure log of all complaints received. Each complaint is stored for a minimum of 5 (five) years from the date of closure..

In compliance with reporting requirements, the Company submits a biannual report to the CGA (by January 15 and June 15 of each year) that includes:

- The total number of complaints received;
- The number of complaints resolved (both settled and rejected);
- The number of complaints still pending or unresolved;
- Breakdown of complaints by category;
- Number of complaints referred to ADR and their respective outcomes;
- Number and summary of cases that resulted in legal proceedings initiated by players.

The Company acknowledges that the Curaçao Gaming Authority has the right to request access to complaint records. The Company will ensure that all such records are kept organized and are ready to be accessed by the CGA if they are requested.

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