

Sculpture N.V.

Player Complaints Policy

This Player Complaints Policy has been prepared in strict accordance with the requirements and guidance issued by the Curacao Gaming Authority (CGA). It reflects our commitment to fair treatment of players, robust complaints handling procedures, and full regulatory compliance. The policy is aligned with the principles set out in the applicable player complaints framework in Curacao and is intended to demonstrate the Operator's dedication to transparency, accountability, and responsible conduct. This document is intended solely for submission to the relevant regulatory authority and is classified as confidential. It contains sensitive and proprietary information and may not be disclosed, copied, or distributed without the prior written consent of the Company.

Version Control

Version	Date	Owner	Status
1.0	04-07-2025	Compliance Officer	Approved
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Change and Review History

Version	Date	Description of Changes	Reviewed/Approved By	
1.0	04-07-2025	Policy Creation and Approval	Compliance Officer	Veremiyenko Kateryna
2.0	11-05-2026	Amended Lodge Complaint and ADR Procedures	Compliance Officer	Veremiyenko Kateryna

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1. Introduction

Sculpture N.V. (“**the Company**”) is committed to ensuring a fair, responsive, and transparent process for handling player complaints and disputes. These procedures have been established in line with Curaçao’s regulatory framework for B2C licensed operators and are aimed at ensuring that all player concerns are addressed promptly, consistently, and fairly.

The Complaints Procedure is made easily accessible via the website’s Terms & Conditions, which can be reached with a single click from the homepage. All staff handling complaints are thoroughly trained to manage issues in accordance with applicable legal obligations and internal standards of customer care.

2. Complaints Handling Procedure

2.1 Lodging a Complaint

Players may submit a complaint to the Company by email at: **complaints@sculpture.com**

Complaints must be submitted by the account holder and must include the following details:

- Full name and registered email address
- Username and/or account ID
- Detailed description of the issue
- Date and time of the incident
- Any relevant supporting documentation or evidence

Anonymous or incomplete complaints may not be accepted unless sufficient information is provided to identify and assess the issue. Complaints can be made through customer support via email and/or live chat.

2.2 Complaint Submission Timeframes

Players may lodge a complaint free of charge at any time up to six (6) months from the date of the settlement of the bet or the occurrence of the incident which is the subject of the complaint. Complaints submitted outside of this timeframe may not be accepted, except where the Company determines there are exceptional circumstances warranting an extension.

Note: Peer-to-Peer (P2P) Games and Ante-Post Fixed Odds Betting: Although Sculpture N.V. does not currently offer peer-to-peer (P2P) games such as poker or ante-post fixed odds betting (greyhound and horse racing), for the avoidance of doubt and in accordance with CGA requirements, the policy records that in such product types the six-month complaint submission period begins from the date of settlement of the bet or the conclusion of the specific event to which the wager relates, rather than from the date the wager was originally placed.

Live Sports Betting Complaints: In the case of complaints relating to live sports betting, players are advised that, while they retain the right to submit a complaint within the standard six-month period, prompt submission is strongly recommended.

Certain data and records relevant to the investigation of in-running betting disputes such as live odds feeds, event data streams and time-stamped wagering logs may by their nature be time-sensitive and may not be available or verifiable indefinitely after the event. Players are therefore encouraged to raise any in-running betting complaint as soon as possible after the incident and in any event within the shortest practicable time, in order to preserve the integrity of the investigation and facilitate a fair and informed outcome.

2.3 Acknowledgement and Timelines

As an operator licensed in Curacao, Sculpture N.V. prioritizes the fair and timely resolution of all player complaints, with particular emphasis on those related to responsible gaming due to their potential impact on player well-being.

Responsible Gaming Complaints:

Complaints concerning responsible gaming issues including but not limited to the targeting of vulnerable players, the availability or timely implementation of self-exclusion and cooling-off measures, such complaints are categorized as high priority. We commit to using our best efforts to resolve these complaints within five (5) business days.

Within two (2) business days of receiving a responsible gaming complaint, we will:

- Confirm receipt of the complaint in writing;
- Explain the process by which the complaint will be investigated and resolved;
- Provide an estimated timeline for resolution.

If additional time is required to reach a fair and informed decision, we will notify the player promptly. The maximum extension for such cases is two (2) weeks. Should a delay result from insufficient or delayed information provided by the player, the resolution period may be further extended by no more than an additional two (2) weeks, with the player being informed accordingly.

All Other Complaints:

For complaints not related to responsible gaming, Sculpture N.V. commits to assessing and responding within four (4) weeks. In complex cases or where information is incomplete, this period may be extended once by up to an additional four (4) weeks, with prior written notice to the player.

Within one (1) week of receiving such complaints, we will:

- Confirm receipt of the complaint in writing;
- Provide details on how the complaint will be handled;
- Inform the player of the expected timeframe for resolution.

Through this approach, Sculpture N.V. ensures transparency, fairness, and regulatory compliance, while maintaining a strong focus on player protection and responsible gaming principles.

2.4 Internal Handling Process

The Company employs a structured and traceable internal complaints procedure to ensure efficient resolution and regulatory compliance.

Logging Complaints:

All complaints are recorded in a centralized complaints management system with the following details:

- Player's identifying information
- Date of submission
- Summary of the complaint
- Assigned complaint handler
- Current status and resolution outcome

Categorization & Prioritization:

Complaints are prioritized based on:

- Severity and impact on the player
- Financial implications
- Potential breach of licensing conditions or consumer protection principles

Investigation:

Complaints that require deeper assessment are investigated thoroughly by competent staff. This includes:

- Root cause analysis
- Internal consultation
- Cross-checking against game logs, transactions, and account activity

Escalation Criteria:

A complaint may be escalated if:

- It involves legal, regulatory, or complex technical issues
- It remains unresolved after initial handling
- It has broader implications for player protection or fairness

Resolution and Communication:

Following investigation, the Company will:

- Communicate the decision clearly and in writing
- Provide reasons for the outcome
- Offer compensation or corrective actions where applicable
- Advise on the next steps, including access to an external dispute resolution body

3. External Dispute Resolution

If the player remains unsatisfied with the outcome of the complaint, they may escalate the matter to an independent ADR (Alternative Dispute Resolution) entity. Sculpture N.V. designates the following ADR provider: EGIS (www.egis-adr.com).

Please note:

- The ADR process is voluntary but encouraged before seeking legal remedies.
- The ADR's decision is non-binding, unless both parties agree to be bound.
- Final Decision by the ADR: Once the ADR process has been completed whether by a determination, a settlement or any other conclusion reached by EGIS neither the player nor the operator may recommence or re-litigate the same dispute with a different or alternative ADR entity. The outcome of the completed ADR process is final as between the parties in respect of that dispute, and the matter may not be re-submitted to another ADR body.
- Dropped ADR Processes: In the event that a player withdraws from or abandons the ADR process after it has formally commenced, the player forfeits the right to re-submit or resurface that same dispute at any future point. A player who drops out of an ongoing ADR process may not initiate a fresh ADR referral in respect of the same subject matter, either with EGIS or with any other ADR entity. This provision is intended to protect the integrity of the process and ensure finality for all parties.

4. Curacao Gaming Authority (CGA) Notifications

Sculpture N.V. operates under the regulatory oversight of the CGA. Players who feel that their complaint has not been adequately addressed may also refer the matter to the CGA.

However, players are strongly encouraged to first exhaust the internal complaint resolution process and the ADR pathway before reaching out to the regulator.

5. Record Keeping and Reporting Obligations

As a licensed operator, we are committed to ensuring transparency and regulatory compliance in the handling of player complaints. In line with our obligations, we will submit detailed complaints reports to the CGA on January 15th and June 15th each year.

These reports will cover all complaints submitted via our Complaints Submission Form during the preceding period and will include the total number of complaints received, the number resolved (upheld or rejected), those still pending, a breakdown by category, complaints referred to ADR, and any instances where players have initiated legal proceedings.

We will fully respect and comply with decisions issued by ADR providers and remain attentive to all relevant regulatory updates. We understand that ADR entities may have separate reporting obligations under the CGA's Alternative Dispute Resolution policy. Furthermore, we will retain records of unresolved complaints, as well as those escalated to ADR or legal action, for a period of up to five years or as otherwise required by applicable

data protection or statutory requirements. We acknowledge that the CGA may, at any time, request access to our complaints and disputes records.

6. Continuous Improvement

The Company commits to:

- Periodically reviewing complaint trends
- Identifying systemic issues
- Updating internal policies and player-facing procedures to enhance fairness, transparency, and user satisfaction

Training and awareness are regularly provided to staff to align with the evolving regulatory framework and responsible gaming obligations.