

HIGHBET B. V.

Abraham Mendez Chumaceiro Boulevard 03

Complaints and Dispute Resolution Policy

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Version	Status	Date	Comments	Signature of the Approver
1.0	Approved	July 28, 2025	Policy created in order to align the activity of the Company with the regulatory requirements	

Policy owner:	HighBet B.V.
Approved by:	Andrii Zabiaka / Managing Director
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1. INTRODUCTION

The Company is committed to ensuring that all customer concerns and disputes are addressed in a fair, transparent, and timely manner. This Policy sets out the framework through which the Company manages customer complaints, establishes clear escalation procedures, and ensures compliance with applicable regulatory requirements. By maintaining effective mechanisms for dispute resolution, the Company seeks to safeguard customer rights, enhance trust in its operations, and promote the highest standards of integrity within its services.

2. DEFINITIONS

Player Interaction - any written communication initiated by a player and directed to the operator's customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

Complaint - a written expression of dissatisfaction by a player relating to the operator's services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution. For the purpose of Reporting requirements (*Clause 6*) a complaint is when a Complaint Submission Form (*Clause 3.2 paragraph 3*) has been submitted by the player to the operator and/or a complaint has been escalated to ADR.

Dispute - a complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organisation or to an independent third party (*e.g. an ADR provider or court of law*).

3. COMPLAINT SUBMISSION

If the Customer wishes to raise a complaint, the Customer must contact our support team without undue delay and, in any case, no later than six (6) months from the date of the settlement of the bet or the incident about which they are making a complaint, via email or via 24/7 live chat.

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Company will respond to Customer's complaint in accordance with the timelines outlined below. All communication from the Company will be sent to the email address associated with the Customer's registered account.

If Customer's complaint is not resolved to the Customer's satisfaction through initial support channels, the Customer may request a formal review by Company's Compliance Team.

To initiate this process, the Customer must complete the Company's official Complaint Submission Form, which is available on the Company's website.

The form may be:

- downloaded from the "Complaints and Dispute Resolution" page, completed, and submitted to Company's email; or
- fully completed and submitted online directly through the Company's website.

The Customer's submission must include, at minimum:

- the Customer's full name, address, and place of residence;
- the Customer's account number *(if applicable)*;
- the date of the complain and the date of the disputed event;
- the monetary amount involved (if applicable);
- description of the issue.

The Customer may also be asked to provide screenshots, transaction references, and any relevant communication with customer support. Complaints submitted by third parties on behalf of the Customer will not be accepted.

Frivolous, abusive, or repetitive complaints may be disregarded following a documented internal assessment, and the Customer will be notified accordingly.

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4. COMPLAINT HANDLING PROCESS

We will acknowledge receipt of the Customer's complaint within two (2) business days (*for Responsible Gaming matters*) or within seven (7) calendar days for all other complaints. We will provide Customer with an individual Complaint Case Number. The Company's Compliance Team may request additional information or clarification in order to conduct a full and fair review.

Complaints concerning Responsible Gaming will be acknowledged and prioritised accordingly.

All communication regarding the Customer's complaint will be recorded and stored as part of our internal compliance process.

5. FINAL DECISION BY COMPLIANCE TEAM

The Compliance Team will issue a final written response within the following timeframes:

- Responsible Gaming complaints: we aim to provide a final decision within five (5) business days from the date we acknowledge your complaint. In exceptional cases, this period may be extended, but the overall resolution time shall not exceed fourteen (14) calendar days in total. If an extension is applied, the Customer will be informed in advance, including the reason for the delay.
- All other complaints: we aim to provide a final decision within four (4) weeks from the date we acknowledge your complaint. If more time is needed due to complex circumstances, this may be extended by up to an additional four (4) weeks, and you will be notified of the reason.

6. ALTERNATIVE DISPUTE RESOLUTION

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In the event that the Customer has completed all of the Company's internal complaints procedures and remains unsatisfied with the outcome, the matter may be referred to Alternative Dispute Resolution (ADR). The relevant contact details of the certified ADR provider will be provided here once designated by the Curaçao Gaming Authority (CGA) and will be made available for review at the time of publication of this Policy.

ADR is available at all times and at the expense of the Company.

The Customer may only refer a complaint to ADR once the Company's internal complaints process has been fully completed and a final written outcome has been issued.

If the Customer drops out of, or fails to remain engaged during, the ADR process, the ADR provider may close the case. In such cases, the Customer will lose the right to reopen or reinitiate the ADR procedure for the same issue.

7. REGULATORY AUTHORITY COMPLAINTS

If the Customer believe we have materially breached our licensing obligations, the Customer may report the issue to the Curaçao Gaming Authority via <https://www.gamingauthority.cw>. Please note that the CGA does not intervene in individual player disputes but may take regulatory action where appropriate.

8. RECORD-KEEPING & REPORTING

The Company shall prepare and submit reports to the Curaçao Gaming Authority on a biannual basis, specifically by 15 January and 15 June of each calendar year. Reports shall cover the period since the previous submission and shall include complaints received via the Complaint Submission Form.

Each report must include a breakdown of the following:

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- the total number of complaints received;
- the number of complaints settled (*distinguishing between upheld and rejected*);
- the number of pending or unresolved complaints;
- the number of complaints by category;
- the number of complaints referred to Alternative Dispute Resolution;
- the number of complaints escalated to legal action.

Records of complaints that remain unresolved or that have been escalated to ADR or legal proceedings shall be maintained for a period of five (5) years, unless a shorter retention period is required under applicable data protection, limitation, or other legal provisions.

The CGA reserves the right to request access to complaint records and information regarding disputes pending resolution at any time.

9. OTHER

In the event of any dispute, the Customer acknowledges and agrees that our server logs, gameplay records, transaction history, and related technical data shall constitute prima facie evidence of all interactions and outcomes, unless the Customer provides credible evidence to the contrary or applicable law requires otherwise.

In any case, the Customer is also entitled to bring proceedings against Company. Curaçao law shall govern, and proceedings shall be brought before the courts of Curaçao, unless applicable law provides otherwise.