

COMPLAINTS

Policy

Hazarion NV

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1. Purpose

- 1.1 The purpose of this document is to explain the process that should be followed when a Customer Service Manager is replying to a complaint received from players, Curacao Authority & Alternative Dispute Resolution body “CADRE”.
- 1.2 At best, the risk of not following this process would result in denting the business' relationship with the regulator; at worst, the business could be fined or have its license suspended for severe breaches.

2. Legal Basis

- 2.1 Under the Curacao regulatory regime, the company is required to handle Player complaints, and if a complaint is not resolved in the player's favour, and the player wants to escalate further, the company can direct the player to an CADRE¹, that will investigate The company's complaint report and provide a final outcome.
- 2.2 Furthermore, for any regulatory complaint, the company will provide the outcome of the investigation to the Authority.

3. Complaint Resolution Process

Step 1: Informal Player Complaint

- 3.1 If a player raises an informal complaint with our Customer Service “CS” team, this will be handled within 72 hours.
 - 3.2 If the business needs more time to review the complaint, our CS team must inform the player via email with an approximate timeframe to provide an outcome to the player's complaint.
 - 3.3 Once CS finalizes their investigation, a response is sent to the player.
 - 3.4 If the player is still not happy with the outcome, and wishes to escalate their
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complaint, CS must inform the player that an internal formal complaint can be raised, and investigated further by our Management team.

Step 2: Formal Player Complaint

3.5 CS must ensure that an official complaint is placed by the player through the Complaints Submission form that is available in the APP. Complaints can only be made by registered players.

3.6 CS must create a click up ticket under the respective folder that is called Customer Disputes and include all information relevant to the complaint (Freshdesk ticket number, content). CS must ensure that the Click up ticket has the unique identification number visible on the top left corner and the URL link.

3.6.1 Reports are to be submitted to the CGA on January 15th and June 15th and will summarize the following:

- a. Total number of complaints made.
 - b. Total number of settled complaints (upheld and rejected).
 - c. Number of pending or unresolved complaints.
 - d. Number of complaints by category.
 - e. Number referred to ADR.
 - f. Number and detail of complaints for which a player has taken legal action.
- Ensure transparency and compliance with ADR decisions and regulatory updates.
 - ADR service providers will have their own reporting requirements in accordance with the Alternative Dispute Resolution policy issued by the CGA.
 - Records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.
 - The CGA reserves the right to request, at any time, access to records of complaints received as well as any disputes that are pending resolution.

3.7 CS informs the player via email that their formal complaint has been escalated, and the outcome of their issue may take 10 days to be resolved. If necessary, due to complexity or lack of information, this period may be extended once by an additional four/(4) weeks, with prior written notice to the player.

3.7.1 Complaints related to responsible gaming should be prioritized due to potential impacts on player well-being. CS shall use best efforts to resolve these cases within five business days. Within two days of receiving a complaint, the CS team 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 to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.

3.8 CS conduct a full investigation on the account and look into the player's issue, liaise with all relevant stakeholders to prepare:

3.8.1 an internal report that will be stored internally (CS must never share this report with the player); and

3.8.2 a draft response to the player's complaint that will be shared with the CS Manager for review. CS must ensure that the answer is structured in such a way that it is deemed satisfactory by the player and that the player receives all the required information to understand how and why we offered this resolution.

3.9 CS must escalate the final outcome of the internal report & draft response to their CS Manager and the Compliance Team members².

3.10 Once the internal report is satisfactory & draft response is signed off by the CS Manager & Compliance team, CS can provide ONLY the response to the player via email.

3.11 All the supporting evidence and report must be included in the click up ticket. All actions taken relevant to that complaint must be visible in the click up ticket.

3.12 CS can now mark the complaint as completed.

Step 3: Escalation of Complaint to ADR

3.13 If the player is still not happy with the completed investigation, and wishes to pursue

the matter further, CS will send a Deadlock email to the player informing them to raise their complaint with CADRE. This email will include detailed information about the player's complaint and a unique reference number, which the player can quote when submitting their complaint to the ADR body.

- 3.14 Once the email is sent, CS must update the Click Up page, and select ADR Review. If within 30 days, no request from the approved and engaged ADR is received, the complaint case can be set to Completed.

Step 4: Complaint Resolution with an approved and engaged ADR

3.15 NOTE: If the approved ADR body reaches out to us, without the deadlock email & unique reference number, CS must inform that ADR to inform the player to reach out to our CS team, to follow the procedure listed here (insert hyperlink to the CS Complaint Resolution Page).

- 3.16 Once CADRE contacts CS on with the deadlock email & unique reference number, CS can review the email request, prepare a draft response and attach the internal Report prepared under Step 2, and inform the ADR not to tip off the player, or share our internal report with the player.

- 3.17 Once CADRE finalizes their review of this complaint, they shall contact us with the outcome, and we can consider this case closed if they rule in our favour. If they rule against us, the business must refund the player, or follow the ADR's advice. If the ruling is severely unjust, CS to raise this with the Management team to set up a call with CADRE to discuss in further detail.

4. Regulatory Complaint

- 4.1 If CS receives an email directly from the Curacao Authority, CS must acknowledge the email and inform the Authority that the case has been escalated internally.
- 4.2 CS must provide a drafted response, and an internal report detailing our investigation.
- 4.3 Once the email and report are signed off by a CS Manager, CS must send everything to the Compliance team.
- 4.4 Compliance will liaise directly with the key person, and if any additional information is required, Compliance will liaise with CS to get any missing information.

4.5 The key person will liaise with the Curacao Authority and depending on the outcome of their decision, Compliance will escalate to Senior Management accordingly.

