

Complaints Policy

SG International N.V.

1. Version Control

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3. Introduction and Purpose of the Policy

The Purpose of this policy is to describe the process of managing Player complaints and disputes and to ensure compliance with the legal and regulatory obligations of SG International N.V. (The “Company”) outlined in the following binding regulations:

- 1) National Ordinance on Games of Chance (“LOK”)
- 2) Player Complaints Policy Guidelines Version 1.1, issued by the CGA, June, 2025

The Company shall make every effort to address emerging complaints or disputes placed by the Players through negotiations. In case of impossibility of such a solution the dispute shall be settled in accordance with the laws of Curacao.

The Company takes Player complaints very seriously, as Player dissatisfaction can expose the Company to regulatory, financial, reputational, operational and other risks.

It is the responsibility of all employees of the Company to ensure compliance with this Policy. Failure to comply with this Policy may have a detrimental effect on the Company.

4. Definitions

Player Interaction - Any written communication initiated by a Player and directed to the Company’s support team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

A Complaint - is a written expression of dissatisfaction by a Player relating to the Company’s services, decisions, terms, or conduct, which indicates the Player is unhappy and expects a response or resolution. For the purpose of Reporting requirements a complaint is when an online complaint form, as further described in Section 5 of this Policy, has been submitted by the Player to the operator and/or a complaint has been escalated to ADR.

A 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 Company or to an independent third party (e.g. an ADR provider or court of law).

5. Placement of a Complaint

Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint. For avoidance of doubt, for the cases of ante post fixed odds betting the six months period begins after the bet settlement or conclusion of a specific event rather than the placement of the wager.

In relation to the complaints concerning in-running sports betting, Players shall be informed via Terms and Conditions, that while they may submit a complaint within six months, prompt

action may be necessary if the investigation may depend on data specific to the complaint which — due to the nature of in-running betting — may no longer be available after a short period, insofar as the Company cannot reasonably be expected to preserve such data any longer.

Complaints can only be made by the registered Player and the Player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the Company. Customer support contact details (e-mail or live chat) shall always be available on the website of the Company for the Player to be able to directly reach out to the Company's support team. However, in cases when the Player wishes to proceed to file a complaint, the customer support shall direct the Player to complete the specifically designated Complaint Submission Form available on the website.

In order to ensure a straightforward and effective complaint and dispute resolution process, the Company shall develop and maintain an online complaint submission form, which must be completed by the Player to file a Complaint to the Company. The form shall be fully completed and submitted online and shall be available to the Players on the website of the Company at all times.

The following mandatory information must be completed by the Player in the online complaint submission form:

1. Player's name, residential address.
2. Date of the complaint and date of the disputed event.
3. Reason of the Complaint
4. Description of the conduct being disputed
5. Supporting documentation

6. Complaint Resolution Process

As described in the Section 5 of this Policy, the Player shall submit the complaint via online submission form available on the website. Once the form has been submitted, the Player shall receive the confirmation e-mail of the receipt of the complaint by the Company no later than within 2 business days. The confirmation e-mail shall also include:

1. An explanation of how the complaint will be processed
2. A notice of the average timeline for resolution of such complaints.

If additional information is reasonably required to address the complaint fully, the operator must have requested this information within the initial four week time period. Should the Player not provide the necessary information within that time period, the Company has the right to reject the complaint.

A Player shall always receive a final determination of their complaint in writing.

The response will be either:

1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.

2. Detailed reasons for not handling the complaint.

Where the Player is unsatisfied with the resolution and makes a further complaint to that effect, the Player shall be informed that he may escalate the matter to an independent ADR entity.

6.1. Responsible Gaming Complaints

The complaints, the reasons of which are related to the Responsible Gaming issues (including but not limited to the involvement of vulnerable persons, the availability and/or timely implementation of self-exclusion and/or cooling-off, etc.) shall be prioritized. The Company shall use its best efforts to resolve these types of complaints within five business days.

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 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.

6.2. Other Types of Complaints

All other complaints shall be assessed and responded to 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.

7. Complaint Reasons

There may be different reasons for the Player's dissatisfaction. The most common complaint reasons include:

1. Deposit issues
2. Withdrawal issues
3. Bonus terms and conditions
4. Account closures or restrictions
5. Alleged errors or unfairness in game outcomes
6. Responsible gaming issues
7. Treatment of Player balances
8. KYC and Verification
9. Data Protection
10. Technical or Software issues
11. AML concerns
12. Issues with minors
13. Fraudulent games
14. Fraudulent practices
15. License or regulation
16. Unfair terms and conditions

The above list of reasons shall be made available to the choice of the Player upon the completion of the online complaint submission form, and shall be updated from time to time, where deemed necessary.

8. Terms and conditions

The Terms and Conditions of the Company shall at all times include the policy of the Company for complaints resolution and details of all applicable stages for a complaint to be resolved.

At least the following instructions and information shall be available to the Players at all times within the Terms and Conditions:

1. Links to customer service and instructions on how to contact the Company to place a complaint
2. Link to the online complaint submission form, which shall be used to place a complaint
3. The list of mandatory information which must be provided in order to file a complaint
4. The timeframe within which the complaints can be placed
5. The time period within which the complaints to be processed or resolved
6. Player rights to complain including explicit rights to ADR services and regulatory escalation.
7. CGA approved Alternative Dispute Resolution ('ADR') provider contact information
8. Details of the ADR process and Player rights
9. 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
10. Information that the CGA does not mediate in individual disputes, but if the Player feels the Company is in breach of regulations that the Player may contact the CGA.

9. Alternative Dispute Resolution

The Company shall offer the independent ADR services to the Players as soon as the list of CGA approved ADRs will be available on the CGA website.

The ADR services shall be used where a complaint cannot be resolved internally and a Player wishes to escalate the case to the independent ADR provider.

Once the ADR process is completed it cannot be recommenced by either the Player or the Company with another different ADR entity.

In the event that the Player drops out of the ADR process (but it has already begun) –the Player shall not have the right to resurface the dispute in the future.

10. Record Keeping and Reporting

The Reporting Officer of the Company shall submit the periodic reports to the CGA on 15th January and 15th June of each calendar year. The report shall include the following information:

- 1) Total number of complaints made
- 2) Total number of settled complaints (upheld and rejected).
- 3) Number of pending or unresolved complaints.
- 4) Number of complaints by category.
- 5) Number of complaints referred to ADR.
- 6) Number and detail of complaints for which a Player has taken legal action.

The Company shall keep the records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings for five years or other relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.

In any case the Company shall ensure transparency and compliance with ADR decisions and regulatory updates, as may be issued from time to time and shall provide records of the complaints received upon the request from the CGA.