

PLAYER COMPLAINTS POLICY.

NovaWave Technology N.V.

Company Registration Number: 162293

Legal Form: Private Limited Liability Company (N.V.)

Statutory Seat: Curaçao

Registered and Mailing Address:

Schottegatweg Oost 10, Unit 1–9

Bon Bini Business Center

Curaçao

Date of Incorporation: November 9, 2022

Fiscal Year: Calendar Year

Policy Year 2026

NovaWave Technology N.V. is a private limited liability company duly incorporated and existing under the laws of Curaçao, registered with the Curaçao Chamber of Commerce and Industry under registration number 162293, having its statutory seat in Curaçao and its registered and mailing address at Schottegatweg Oost 10, Unit 1–9, Bon Bini Business Center, Curaçao. The Company was incorporated on November 9, 2022, operates with a fiscal year corresponding to the calendar year and has as its corporate purpose the supply, marketing, promotion, management, support and operation of all types of remote gaming activities, including betting and interactive games, as well as acting as an online gaming software provider in the broadest sense for clients established or residing outside Curaçao.

This Player Complaints Policy applies to all gaming services, platforms, systems and software solutions operated, managed, supported or supplied by NovaWave Technology N.V., irrespective of the distribution model, jurisdiction of end users or commercial arrangements with third party operators.

1. Regulatory Framework Purpose and Legal Nature of the Policy

This Player Complaints Policy establishes the complete legal, operational, procedural and governance framework adopted by NovaWave Technology N.V. for the structured receipt, registration, assessment, investigation, handling, resolution, documentation, monitoring and regulatory reporting of complaints and disputes submitted by players or users.

This Policy has been drafted in full compliance with the National Ordinance on Games of Chance of Curaçao (Landsverordening op de Kansspelen), all binding regulations, supervisory rules, policy documents, technical standards and official guidance issued by the Curaçao Gaming Authority, as well as applicable civil law provisions, consumer protection principles, data protection requirements and

international best practices applicable to remote gaming and online software providers.

Compliance with this Policy constitutes a mandatory licensing condition and an essential element of the Company's governance and compliance framework. Any deviation, omission or failure to comply with the procedures, timelines, transparency duties, record keeping obligations or reporting requirements set forth herein may expose the Company to supervisory actions, administrative sanctions, corrective measures or enforcement proceedings by the competent regulatory authorities.

The Company expressly recognises that a transparent, accessible, impartial and effective complaints handling mechanism is a fundamental pillar of player protection, responsible gaming governance, operational integrity, regulatory trust and reputational risk mitigation.

2. Definitions and Interpretative Rules

For the purposes of this Policy, a Player Interaction means any written communication initiated by a player or user through the Company's official support channels, including requests for information, clarification, assistance, feedback or operational inquiries.

A Complaint means any written expression of dissatisfaction submitted by a player relating to the Company's services, platforms, software, operational decisions, contractual terms, game functionality, betting outcomes, payment processing, account management, identity verification, bonus conditions, responsible gaming tools, data protection practices, technical incidents or any other aspect of the relationship between the player and the Company where the player expects a reasoned response or remedial action.

A Dispute means a complaint that has not been resolved to the player's satisfaction through the internal complaints handling procedure and has been escalated either internally for enhanced review or externally to an independent Alternative Dispute Resolution provider or to a competent judicial authority.

All definitions contained in this Policy shall be interpreted in a manner consistent with applicable gaming regulations, civil law principles and consumer protection standards.

3. Scope of Application and Binding Effect

This Policy applies to all registered players and users of gaming services supported or operated by NovaWave Technology N.V., including former players and, where applicable, prospective users whose complaints relate to registration, verification or access to services.

This Policy is binding on all directors, statutory officers, executives, managers, employees, consultants, contractors and third parties acting on behalf of or under the authority of the Company, irrespective of their role or function.

No person acting for or on behalf of the Company is authorised to refuse the receipt of a complaint, discourage a player from submitting a complaint, delay registration, manipulate records or otherwise interfere with the integrity of the complaints handling process.

4. Eligibility and Time Limits for Complaint Submission

Complaints may be submitted free of charge within a maximum period of six months from the settlement of the relevant bet or from the occurrence of the event giving rise to the complaint.

In the case of peer to peer games, ante post betting or events settled at a later stage, the submission period commences from the conclusion or settlement of the relevant event.

Only the registered account holder is entitled to submit a complaint. Complaints submitted by third parties, representatives without proper authorisation or assignees of claims are not admissible in accordance with applicable gaming regulations.

5. Complaint Submission Channels and Acknowledgement

The Company provides a formal electronic Complaint Submission Form accessible through its website or equivalent digital channels. The form requires accurate identification of the complainant, account details, relevant dates, a detailed description of the facts and any supporting documentation reasonably necessary for assessment.

Upon receipt of a complaint, the Company issues a written acknowledgement confirming registration, assigning a unique reference number and informing the player of the applicable handling procedure and expected resolution timelines.

6. Internal Assessment Investigation and Decision Making

Each complaint is recorded in the Company's internal complaints management system to ensure traceability, accountability and regulatory oversight.

An initial assessment is conducted to verify completeness, admissibility and classification of the complaint. Where additional information or clarification is required, the player is contacted and granted a reasonable period to respond.

The complaint is then assessed by the relevant internal departments, which may include compliance, risk management, payments, technology, security, responsible gaming and data protection functions. All relevant transaction records, system logs, contractual terms and internal policies are reviewed in detail.

Following a consolidated review, the Company issues a reasoned, evidence based and proportionate decision in accordance with applicable regulations and contractual obligations. The decision is communicated to the player in writing in a clear, comprehensive and transparent manner.

7. Resolution Timeframes

Complaints relating to responsible gaming, vulnerable players or player protection safeguards are treated as a priority and addressed without undue delay.

All other complaints are resolved within four weeks from the date of submission. Where complexity or insufficient information justifies an extension, a single extension may be applied, provided the player is informed in writing in advance and the extension does not exceed an additional four weeks.

8. Use of Automated Systems and Artificial Intelligence

Automated systems or Artificial Intelligence tools may be used solely in a supportive and auxiliary capacity for administrative processing, data retrieval or pattern analysis.

Complaints involving responsible gaming, vulnerability assessments or complex factual or legal issues are handled exclusively by qualified human personnel. All automated outputs remain subject to continuous human oversight to ensure fairness, consistency and non discriminatory treatment.

9. Alternative Dispute Resolution

Where a complaint is not resolved internally, the player has the right to escalate the matter to an independent Alternative Dispute Resolution provider certified by the Curaçao Gaming Authority.

The Company maintains valid contractual arrangements with certified ADR providers and bears the associated costs in accordance with regulatory requirements. Once an ADR procedure has been concluded, the same dispute may not be resubmitted to another ADR provider.

10. Record Retention Reporting and Regulatory Access

The Company maintains complete, accurate and up to date records of all complaints, including submissions, correspondence, internal assessments, decisions and ADR outcomes.

Records are retained for a minimum period of five years or for such longer period as required by applicable data protection laws or limitation periods.

Regulatory reports are submitted to the Curaçao Gaming Authority within the prescribed deadlines, and the Authority may request access to complaint records at any time for supervisory or audit purposes.

11. Transparency Publication and Player Information

This Policy is made publicly available on the Company's website and is incorporated by reference into the applicable Terms and Conditions.

Players are clearly informed of their rights, complaint submission procedures, resolution timelines, escalation mechanisms and the supervisory role of the Curaçao Gaming Authority.

12. Periodic Review and Updates

This Policy is subject to regular review to ensure continued compliance with regulatory developments, supervisory guidance and evolving best practices in player protection and responsible gaming.

13. Final Provisions

NovaWave Technology N.V. reaffirms its ongoing commitment to transparency, fairness, accountability and regulatory integrity. All complaints are handled with diligence, impartiality and respect for applicable laws and supervisory expectations.

Policy written and reviewed by
Irati Aparecida Santos
Compliance Officer