

1. Purpose and Scope

This Player Complaints Policy ("Policy") defines the procedures, responsibilities, and standards for managing player complaints in accordance with the applicable legal framework in Curaçao and the obligations imposed by the Curaçao Gaming Authority (CGA). The Policy ensures that complaints are addressed fairly, transparently, and within the prescribed timeframe, and applies to all services offered via the Magic365.com platform. This Policy is incorporated into the platform's Terms and Conditions and is available to all players prior to registration. By completing the registration process, the player confirms agreement with this Policy.

2. Legal and Regulatory Framework

The Policy is established under the National Ordinance on Games of Chance (LOK), the licensing conditions, and the Complaints Policy Guidelines issued by the CGA. It also integrates relevant principles of consumer protection and responsible gaming. CGA does not adjudicate individual complaints. However, the operator is obliged to notify CGA in case of unresolved complaints, systemic violations, or failures to comply with applicable regulations.

3. Definitions

A "complaint" is defined as a formal expression of dissatisfaction by a player regarding the service quality, conduct of staff, technical performance, financial transactions, responsible gaming measures, or other platform operations. A "dispute" is a complaint that remains unresolved after the operator has issued its final decision and may be referred to an Alternative Dispute Resolution (ADR) body. A "player interaction" refers to any meaningful engagement between the player and the operator's platform that may give rise to a complaint or regulatory issue.

4. Submission of Complaints
Complaints may be submitted through:

- Email: support@magic365.email
- Player account message center
- Contact form on www.magic365.com

All complaints must be submitted within six (6) months of the relevant incident. Players must first raise the matter with Customer Support before escalating to a formal complaint. The official language for submitting and processing complaints is English. Complaints submitted in other languages may require additional processing time.

5. Minimum Requirements

Each complaint must include: full name, registered email, account number or

username, date and description of the disputed event, and any supporting documentation. Anonymous or incomplete complaints may be rejected. Where feasible, the operator may request clarifications. Lack of response may result in case closure. Re-submission of previously resolved complaints on the same matter is not permitted unless new relevant facts are presented.

6. Acknowledgment and Timeframes

The operator acknowledges valid complaints within 72 hours. Complaints related to responsible gaming are resolved within five (5) business days. All other complaints are resolved within four (4) weeks. If additional time is required, the operator may extend the resolution period to a maximum of eight (8) weeks, with timely notice to the player.

7. Complaint Handling and Decision

Complaints are recorded in a secure incident register, assigned a unique reference number, and handled by personnel not involved in the underlying issue. The designated officer reviews all relevant evidence and communicates a final decision. Players are informed of the outcome and their right to escalate the complaint to an ADR body. A copy of the final response is provided to the player with a note confirming that the complaint is closed.

8. Escalation and ADR

Unresolved disputes may be submitted to an independent ADR entity, free of charge to the player. The operator provides ADR contact details and instructions with the final decision. Once ADR concludes the matter, it is considered closed. The operator reserves the right to reject ADR requests that fall below a minimum monetary threshold, provided such limitation is lawfully justified and disclosed to the player in advance.

9. Use of Artificial Intelligence

Artificial intelligence or automated tools may not be used in the handling of complaints related to responsible gaming or in complex cases requiring subjective assessment. These complaints must be reviewed by qualified personnel.

10. Reporting Obligations

The Compliance Officer or MLRO submits reports on all received complaints twice annually, no later than January 15 and June 15. Reports include complaint volumes, categories, resolutions, escalations, ADR referrals, and any observed trends. Aggregated complaint data may be shared with regulatory authorities for reporting and oversight purposes, without disclosing the identity of individual complainants. Records are maintained for a minimum of five (5) years.

11. Fairness and Confidentiality

All complaints are treated confidentially and in a non-discriminatory manner. Player data is processed only for complaint resolution and disclosed only when legally required. Decisions are based on objective evidence, platform policies, and

applicable regulations. Players are not subjected to retaliatory measures or service restrictions for filing a complaint. Oversight of this Policy's implementation is carried out by the MLRO in collaboration with the designated Complaint Officer.

12. Force Majeure

In case of force majeure, such as system outages or natural disasters, complaint processing may be delayed. The operator commits to resolving all pending matters as soon as practicable and to keeping players informed.

13. Review and Updates

This Policy is reviewed annually or when regulatory changes or business developments require updates. The updated version is approved by the Board of Directors and published on the platform.

14. Consequences of Breach of Terms

In the event a player violates the Terms and Conditions of Magic365.com or applicable laws, the operator reserves the right to take appropriate measures including, but not limited to:

- refusing to process the related complaint;
- notifying competent authorities, including the FIU Curaçao and/or law enforcement bodies;
- temporarily or permanently suspending the player's account;
- reversing or withholding any winnings, bonuses, or credits obtained in violation;
- blocking access to the platform; and
- cancelling the player's username and password.

Furthermore, the player shall indemnify and hold harmless the Company, its affiliated entities, directors, officers, and employees against any claims, damages, liabilities, losses, or legal expenses resulting from such violation. The player is fully liable for all associated costs, including legal fees, incurred by the Company in the course of enforcing its rights.

Contact

MLRO: Mr. Uhnivenko

MLRO Email: j.compliance@magic365.com

Information

Maksym

Approved by the Board of Directors of Magic Stones N.V.
Effective Date: 15.06.2025



By: Vivian Ersilia o.b.o (SMES) Solutions for Management and Employment Support N.V.

Managing Director

Date: 09.07.2025