

GBL Solutions N.V. Complaints Policy

Version: 1.0

Effective Date: 25 June 2025

Licensee: GBL Solutions N.V.

Jurisdiction: Curaçao (licensed under LOK)

1. Policy Overview

GBL Solutions N.V. (“the Company”) is committed to providing every player with a clear, fair and efficient means of raising concerns about aspect of the gaming service. This Player Complaints Policy sets out the manner in which complaints are submitted, investigated, resolved and – where necessary – referred for independent alternative dispute resolution (“ADR”). The Policy is designed to ensure full compliance with Article 5.3 of the National Ordinance on Games of Chance (“LOK”) and with the Curacao Gaming Authority (“CGA”) Complaints Policy Guidelines, Version 1.1, dated 18 June 2025.

The Policy applies from the date on which the Company’s licence under the LOK is issued (or, for operations continuing under a NOOGH seal, from the moment the dynamic seal was granted) and remains in force until replaced. It does not limit any right that a player may have under private law or under the LOK to pursue a remedy through the courts.

2. Definitions

For the purposes of this Policy, a “player interaction” is any written communication initiated by a player and directed to customer service; a “complaint” is any written expression of dissatisfaction regarding the Company’s services, decisions, terms or conduct for which the player expects a response; and a “dispute” is a complaint that has not been resolved to the player’s satisfaction and has been escalated either internally or to an independent third party.

3. Complaint Submission Process

A player may lodge a complaint free of charge at any time within six months of the settlement of the bet or other incident that gave rise to the issue. In the case of peer-to-peer games or ante-post betting, the period begins on settlement of the bet; for in-running betting, prompt submission is encouraged where data relevant to the investigation may no longer be available after a short time.

Complaints must be submitted by the registered account-holder personally. To begin the process, the player should contact customer support via live chat or email. If the matter is not resolved at first contact, the player will be asked to complete and submit the Company’s Complaint Submission Form. The form is available in English and in the language of the domain through which the player accesses the site; it requests the complainant’s name, account number, contact details, the date of the incident, a concise description of the issue and any supporting documentation that is reasonably required for proper assessment.

4 Internal Resolution Process

Upon receipt of a completed Complaint Submission Form, the Company will acknowledge the complaint in writing within **seven calendar days**, explain the steps that will follow and indicate the normal timeline for resolution. Complaints relating to responsible gaming – including self-exclusion, cooling-off, targeting of vulnerable persons or similar matters – will receive priority handling and the Company will use its best endeavours to conclude the investigation within **five business days**. Other complaint categories will be assessed and answered within **four weeks**; if additional time is essential owing to complexity or missing information, the period may be extended once by a further four weeks, with written notice to the player explaining the reason for the extension.

All communications concerning responsible-gaming complaints and all complaints deemed complex will be conducted by trained human staff. The Company may deploy artificial intelligence tools for triage or routine correspondence provided that every AI-generated exchange is monitored for consistency, fairness and accuracy and that the final decision is approved by a human agent.

The player will receive the Company's final determination in writing. The decision will contain a reasoned explanation, relevant evidence where appropriate, and, if the complaint is rejected, a statement of the grounds on which it was not upheld. Where further information has been requested but not supplied within the prescribed period, the Company may close the case and advise the player accordingly.

5 Alternative Dispute Resolution

If the player remains dissatisfied after the internal procedure has concluded, the matter may be escalated to an independent ADR entity certified by the CGA. The Company maintains contractual arrangements with ADR providers listed on the CGA website; the service is free to the player. Details of the ADR provider(s), together with the procedure for referral and the legal implications of any ADR outcome, are set out in the Terms and Conditions. Once an ADR process has been completed, it cannot be re-opened before a different ADR entity.

6 Record-Keeping and Reporting

Comprehensive records of every complaint, the steps taken to resolve it, the outcome, and any subsequent dispute are retained for five years or such shorter period as applicable laws on data protection or limitation prescribe. Twice annually, on 15 January and 15 June, the Company submits to the CGA an aggregated report stating, inter alia, the number of complaints received, resolved, pending, escalated to ADR and subjected to legal action, broken down by category.

The CGA may request access to underlying records at any time for supervisory purposes. While the CGA does not adjudicate individual disputes, players may approach the Authority directly if they believe the Company has breached regulatory obligations.

7 Integration with Terms and Conditions

A clear statement of this Complaints Policy is published on the Company's website as a standalone document accessible from the home page and registration pages. The Terms and Conditions incorporate the Policy by reference and highlight the player's right to free ADR and the fact that the CGA does not mediate individual transactions. Acceptance of the Complaints Policy forms part of the account registration process.

8 Reasons for Complaint

Players may raise concerns regarding the aspects of their interaction or engagement with the Company, including but not limited to matters related to financial transactions, promotional conditions, access limitations, perceived integrity of services, protective measures, handling of user accounts and information, identity verification processes, technological reliability, potential misconduct, compliance obligations, age-related considerations, or potential areas of non-alignment with existing frameworks.

9 Review and Amendment

This Policy is reviewed at least annually, and in any event whenever relevant legislation, CGA guidelines or operational experience indicate that amendments are necessary to maintain best practice and compliance. Updated versions are published on the website and take effect on the date stated therein.

10 Transition

Pursuant to Clause 9 of the CGA Guidelines, a copy of this Policy will be uploaded to the CGA Portal no later than 31 July 2025.

Approved by the Board of Directors of GBL Solutions N.V. on 25 June 2025.