

Player Complaints Policy

Version 1.2 – November 2025

License Holder: Zerone B. V.

License: Curaçao Gaming Authority (CGA)

Responsible Department: Compliance

1. Purpose and Scope

This document outlines the policy and procedures established by Zerone B. V. for receiving, recording, investigating, and resolving player complaints in compliance with the Curaçao Gaming Authority (CGA) regulatory framework.

The objective of this policy is to ensure that all complaints are handled fairly, transparently, promptly, and consistently, while maintaining accurate records and full cooperation with the CGA.

This policy applies to:

- All registered players of Zerone B. V., including former players with outstanding disputes;
 - All customer-facing departments (Customer Service, Compliance, Responsible Gaming, Fraud, Risk and Payments);
 - Third-party service providers acting on behalf of Zerone B. V. in the handling of customer issues.
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2. Definition of a Complaint

A complaint is defined as an expression of dissatisfaction made by a player concerning any aspect of the operator's services, where a response or resolution is expected.

This may include, but is not limited to:

- Account management or verification issues;
- Deposits, withdrawals, or payment disputes;
- Bonus or promotional terms;
- Technical or platform-related issues;
- Responsible gambling or self-exclusion matters.

General inquiries or requests for assistance that do not express dissatisfaction (e.g., "how do I withdraw funds?") are not considered formal complaints and are handled by Customer Service as standard support.

3. Internal Complaint Handling Procedure

3.1 Submission of Complaints

Players can submit a complaint through the following official channels:

- Live chat
- Support e-mail: clubR10@sportlocker.com
- Formal complaint form: available on our website
(the completed form must be sent to compliance@sportlocker.com)

All formal complaints must include the player's full name, username, contact e-mail, a detailed description of the issue, and any supporting evidence (screenshots, transaction IDs, etc.).

3.2 Acknowledgment and Registration

- All complaints are acknowledged within 48 hours of receipt.
- Each complaint is assigned a unique reference number for tracking and audit purposes.
- The complaint is logged into the Compliance Register, which includes:
 - Date received
 - Category of issue
 - Responsible department
 - Actions taken
 - Final resolution and date closed

3.3 Review and Investigation

1. Customer Service Review:
The first review is conducted by the Customer Service team, which attempts to resolve the issue directly with the player.
2. Escalation to Compliance:
If unresolved, the complaint is escalated to the Compliance Department, which conducts an independent investigation.
3. Fair Treatment:
All complaints are handled objectively, without bias, and with full access to relevant internal data and records.

4. Evidence Collection:

Compliance may request additional documents or clarifications from the player to ensure a complete review.

3.4 Resolution Timelines

- Responsible Gambling complaints: within 5 business days
- General complaints: within 20 business days
- Complex cases: may be extended by up to an additional 20 business days, with prior notification to the player

Players are informed of the outcome in writing, including the reasoning and evidence supporting the decision.

4. Record-Keeping and Continuous Improvement

All complaints and related documentation are retained for a minimum of five (5) years in a secure digital environment accessible only to authorized personnel.

The Compliance Department performs quarterly reviews of complaint data to:

- Identify recurring issues or risk patterns;
 - Recommend corrective or preventive measures;
 - Ensure consistent service standards;
 - Report key findings to senior management and the CGA if requested.
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5. Escalation to ADR (Alternative Dispute Resolution)

Zerone B. V. acknowledges the requirement established by the Curaçao Gaming Authority (CGA) for all licensed operators to be linked to an independent and CGA-certified Alternative Dispute Resolution (ADR) entity.

At this stage, Zerone B. V. is committed to formalizing its registration with an approved ADR as soon as the official list of certified ADR entities is published by the CGA.

Until that time, the operator will continue to manage all player complaints internally in accordance with this policy, ensuring transparency, fairness, and full cooperation with the CGA in case of any escalated disputes.

6. Communication with the CGA

The Compliance Department will maintain open communication with the Curaçao Gaming Authority, providing complaint records or case details upon request. Any incident or pattern suggesting a breach of license conditions or player harm will be reported promptly to the CGA.

7. Policy Review

This policy is reviewed annually or upon any regulatory change issued by the CGA. Updates and new versions are recorded with version control and approved by the Head of Compliance prior to publication.

8. Contact Information

Compliance Department – Zerone B. V.
compliance@sportlocker.com

Attachments

1. Screenshot to the Player Complaint Form
2. Link to the Player Complaints page on the Zerone B. V. website

Attachment 1:

Link to the Player Complaint Form

https://docs.google.com/forms/d/e/1FAIpQLSfDD8nZrr4Dtrq8vKZforj_-8BDBqlMUlpB3tNDOotI069hfw/viewform

Attachment 2:

Link to the Player Complaints page on the Zerone B. V. website

<https://clubr10.com/pt-BR/pol%C3%ADtica-de-reclama%C3%A7%C3%B5es>
