

Sapphire Curacao N.V.

COMPLAINT HANDLING PROCEDURE

Revision History

Version#	Effective date	Approving official	Responsible officer	Next review date	Comments
1.0	July DD, 2025	Xecutive Corporate Management B.V.	Compliance function	July DD, 2026	

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1. Objectives

To establish the manner in which players can communicate about their complaints regarding Company's website and how these are handled. This Complaints Policy is based on regulatory requirements under the Landsverordening op Kansspelen ("LOK") and the Player Complaints Policy Guidelines version 1.1. of June 18th 2025, by the Curaçao Gaming Authority ("CGA").

The Company shall provide a Customer Support service equipped with adequate resources to promptly and effectively respond to Customers via phone and email.

2. Definitions

ADR: Alternative dispute resolution ('ADR'), which is offered in accordance with the ADR policy as is to be issued by the CGA.

The Company: Sapphire Curacao N.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under number #120314

Complaint: A written expression of dissatisfaction by a player, relating to the Company's services decisions, terms or conducts, whereby the player expects a response or resolution.

Customers: Players who have opened an account on the Company's website and have been accepted as customers.

Registered Player: a Customer who has completed the registration process on the Company's platform or website, provided all required information, agreed to the terms and conditions, and whose account has been approved and activated.

Reportable Complaint: when a Complaint Submission Form has been submitted by the Customer and/or a Complaint has been escalated to the ADR.

3. Responsibilities

The Customer Support Team handles all Customer inquiries, ensuring prompt and high-quality responses.

3.1 Procedure

Complaints can only be done by the Registered Player. A Registered Player is not allowed to sell, donate, rent out, lease, pawn or pledge, under any title, any of their (alleged) claims.

3.2 Complaint Window

The Customer lodge a Complaint, free of charge, within six months from the date of the bet settlement or the occurrence of the incident to which the complaint relates.

If the Complaint is initiated after this date, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.

All Complaints regarding sports betting should be submitted as soon as possible. Due to the nature of the bet, delays may result in the unavailability of relevant data. Although the Customer may lodge a Complaint within six (6) months from the date of bet settlement, it is advised to take prompt action. The investigation regarding the Complaint may depend on the available data and the Company can't guarantee that all data is still available at that time.

3.3 Standard Complaints

At first instance, Customer Complaints are handled by our customer support Team. Customers may contact the customer support team using the contact details made available on the website via email and/or live chat. If the first contact by the customer support team is not satisfactorily, the Customer can file an official Complaint Submission Form, which will include the following information and which will be available in English and the language of the URL that the Customer is using:

- A. Customer's name, address and place of residence;
- B. Customer's account number or name;
- C. Date of the complaint and date of the disputed event;
- D. Description of the conduct being disputed;
- E. Amount in dispute.
- F. URL

Upon receiving this Complaint Submission Form, the Complaint becomes a Reportable Complaint. Depending on the nature of the Reportable Complaint, the designated customer support team member shall respond to the Customer.

The Company will provide the customer support function through a system designed to manage the support tickets, complaints, feedback and suggestions submitted by Customers. Initially, all customer support will be done through email, helpdesk chats and/or communication via telephone.

The Customer will receive a final conclusion of their Reportable Complaint, which can entail:

- A final assessment of the outcome/resolution of the Reportable Complaint;
- Detailed reasons for not handling the Reportable Complaint.

In case the Customer is not satisfied with the resolution and makes a further Complaint to that effect, the Customer can escalate the matter to an independent ADR entity. Once the Customer informs the Company about the desire to escalate the matter to the ADR, the Company will provide the details of the ADR.

3.4 Timeframe Responsible Gaming Complaint

If the Reportable Complaint by the Customer is related to responsible gaming, such as complaints about self-exclusion, cooling-off period, gaming addiction, then the Company will use its best efforts to resolve these cases within five (5) business days.

Within two (2) business days of receiving the Reportable Complaint, the Company will acknowledge receipt of the Complaint in writing, explain the process by which it will be handled, and inform the Customer of the average expected timeline for resolution.

In case more time is needed to make a reasonable and informed decision, the Customer will be informed about the delay. The Company commits to providing a response within two (2) weeks. However, if a delay is caused due to lack or slow response from the Customer, the resolution period may be extended by another two (2) weeks.

3.5 Timeframe other Complaints

Although the process is similar to responsible gaming complaints, the timeline is different.

Within one (1) week of receiving the Reportable Complaint, the Company will acknowledge receipt of the Complaint in writing, explain the process by which it will be handled, and inform the Customer of the average expected timeline for resolution.

In case more time is needed to make a reasonable and informed decision, the Customer will be informed about the delay. The Company commits to providing a response within four (4) weeks. However, if a delay is caused due to complexity, or lack or slow response from the Customer, the resolution period may be extended with another four (4) weeks.

4. Alternative Dispute Resolution

In all instances of communication, the customer support team shall readily be available to its Customers the applicable procedure for forwarding the Reportable Complaint to an Alternative Dispute Resolution (ADR) entity.

The Company will be engaging an independent ADR entity in Curaçao, approved by the CGA.

The dispute resolution procedure at the ADR is free of charge, independent of the outcome. However, the Customer must first exhaust the Company's complaint procedure before the Customer can approach an ADR.

A decision of an ADR entity is binding on both the Company and the Customer who submitted the Reportable Complaint. The Customer can only bring Reportable Complaints to an ADR if:

- the value of the Reportable Complaint is more than EUR 5.000, - or
- if the Reportable Complaint pertains to a Responsible Gaming complaint.

More specific details of the ADR procedure will be provided as soon as the CGA has published their ADR policy.

The ADR procedure does not eliminate the possibility for Customers to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure.

5. Complaints to the CGA

The CGA will not resolve or make decisions on any player complaints nor will act as an ADR/escalation entity as it does not mediate in individual disputes.

CGA can be contacted by the Customer with regards of matters such as malpractice, breach of license conditions or whistle blowing.

6. Record Keeping

The Company shall submit twice per year a report to the CGA detailing any Reportable Complaints and their outcomes, where known. Such reports will include:

- the total number of submitted Reportable Complaint;
- the total number of settled Complaints (whether upheld or rejected);
- the number of pending or unresolved Complaints;
- the number of Complaints per category (Responsible Gaming or other Complaints);
- the number of Complaints referred to the ADR;
- and the number and detail of Complaints for which the Customer has taken legal action.

Records of unresolved Complaints and/or Complaints that have been escalated to ADR or legal proceedings will be kept for five (5) year or the relevant time stipulated by data protection, statute of limitations or other relevant laws.

A summary of this policy may be published on the URL(s) of the Company.