

Trivico B.V.

COMPLAINT HANDLING PROCEDURE

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1 Introduction

At Trivico B.V we are committed to providing a safe, fair, and transparent gaming environment for all our players. As a licensed operator under the jurisdiction of Curaçao, we adhere strictly to the provisions set out in the National Ordinance on Games of Chance (Landsverordening op de Kansspelen – LOK), particularly Article 5.3 and the Player Complaints Policy Guidelines version 1.1. of June 18th 2025, by the Curaçao Gaming Authority ("CGA"). This policy outlines the process through which players can raise concerns or lodge complaints regarding their gaming experience, including disputes related to account management, payments, bonus usage, or perceived unfair treatment. Our objective is to ensure that all complaints are handled fairly, transparently, and in a timely manner, in line with the legal and regulatory framework applicable to our operations.

The company ensures that every complaint is received, registered, assessed, and responded to with due diligence, maintaining open communication with the player throughout the resolution process. Should a player not be satisfied with the outcome of their complaint, the policy also provides for the escalation of the matter to the appropriate regulatory bodies, as required under Article 5.3 of the LOK. 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:	Trivico B.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under number #166069
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 Policy Overview

3.1 The Aim

The primary aim of this policy is to establish a clear, accessible, and fair framework through which players can raise complaints or concerns related to their experience with Trivico B.V. The policy is designed in alignment with Article 5.3 of the National Ordinance on Games of Chance (LOK) to ensure that all complaints are handled in a transparent, timely, and consistent manner.

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

4 Policy Scope

This policy applies to all gaming services that the company provides and sets forth our approach in the following key areas.

4.1 The Objectives

- **Protect Player Rights:** Ensure that all players have a structured and impartial avenue to voice concerns or dissatisfaction.
- **Promote Transparency:** Provide clear guidelines on how complaints are submitted, assessed, and resolved.
- **Ensure Fairness:** Guarantee that each complaint is handled objectively, without bias, and based on factual evidence and regulatory standards.
- **Enhance Player Trust:** Build and maintain a relationship of trust by demonstrating our commitment to accountability and responsible conduct.
- **Support Regulatory Compliance:** Fulfil the requirements of Article 5.3 of the LOK by implementing a formal mechanism for complaint resolution and regulatory reporting where necessary.
- **Drive Service Improvement:** Use complaint data to identify trends, resolve systemic issues, and improve the overall quality of our gaming services and customer experience.

4.2 Information related to an ADR

In line with Article 5.3 of the National Ordinance on Games of Chance (LOK), if a player is not satisfied with the outcome of an internal complaint resolution, they have the right to escalate their dispute to an Alternative Dispute Resolution (ADR) entity.

An ADR is an independent, impartial third party authorised to mediate and decide on unresolved disputes between players and licensed operators. The purpose of the ADR process is to provide players with an accessible, fair, and cost-free means of resolving issues when internal complaint procedures have been exhausted without a satisfactory resolution.

4.3 Reference to website Terms and Conditions

This Complaints Policy forms an integral part of the overall player protection framework implemented by Trivico B.V. and should be read in conjunction with the Terms and Conditions published on each website operated by the company.

Each website under the operation of Trivico B.V. outlines specific provisions related to disputes, complaint handling, and the rights and obligations of both the player and the operator. These provisions are legally binding and serve as the basis upon which any complaint or dispute is assessed and resolved.

5 Compliant Submission Process

5.1 Eligibility to submit a complaint

- Players may submit a complaint free of charge within six (6) months from the settlement of the bet or the incident giving rise to the complaint.
- If the Complaint is initiated after this date, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.

5.2 Stages and escalation of complaint resolution

1. Complaints can only be made by the registered player. Article 1.3 section c of the LOK mandates that a player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the holder of a gaming license from the CGA.
2. The player must contact the customer support department via E-mail or chat. The player must state that he wishes to open a complaint under the casino where he holds an account, which is operated by Trivico B.V
3. A form will be emailed to the player that the player needs to filled out in English and submitted by email to complaints@trivicobv.com. The form includes the following points that need to be filled in by the player:
 - Complainant's name, address, and place of residence.
 - Complainant's e-mail address (Registered E-mail address linked to the player's account)
 - The date of the complaint submission and the date of the disputed event
 - A description of the conduct being disputed
 - A selected dispute section (A list of selections to which the complaint refers)
 - Amount in dispute.
 - 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.

List of complaint categories

Complaint category	Information
Deposit Issue	Used when a player's deposit has not been credited, was incorrectly processed, or there were issues with the deposit method or fees.
Withdrawal Issue	Raised when there are delays, denials, or incorrect amounts in withdrawals, or if withdrawal terms are unclear or inconsistently applied.
Terms and conditions - Bonus	Relevant when players believe bonus terms were unfairly applied, unclear, or if bonus winnings were withheld.
Account restrictions and closures	Used when a player's account has been restricted or closed and they believe this was done without valid reason, proper notice, or transparency.
Alleged unfairness or errors in game outcomes	Raised when a player believes a game malfunctioned, paid out incorrectly, or operated in a way that appeared unfair or biased.
Responsible Gaming	Used when players feel the casino failed to uphold responsible gaming obligations, such as honouring selfexclusion or deposit limits.
Account balance issue	Applicable when a player's account shows an incorrect balance or funds appear to be missing, duplicated, or misallocated.
KYC and verification issues	Raised when there are delays or disputes in verifying player identity, unclear document requirements, or re-verification practices.
Data Protection concerns	Used when players believe their personal data was mishandled, shared improperly, or not stored in line with data protection laws.
Technical or software errors	Applies when there are bugs, glitches, crashes, or performance issues affecting games or account functionality.
Anti-money Laundering concerns (AML)	Used when players feel AML-related account actions (such as fund freezing or requests for source of funds) were unclear, unjustified, or not properly communicated.
Gambling by a minor	Raised when there is a concern or evidence that an underage individual accessed gambling services, contrary to legal and company obligations.
Fraudulent games or practices	Used when a player suspects that a game, bonus offer, or operational behaviour was deceptive or intentionally misleading.
Licence Compliance	Applies when a player feels that the operator has breached the terms of its gaming licence, such as by offering unauthorized products or services.
Regulatory issue	Used when the complaint relates to the operator's failure to comply with applicable gaming laws or regulations, beyond licence-specific terms.
Terms and conditions	Raised when a player believes that a previous outcome related to terms and conditions has been unfair.

- Once a complaint outcome has been finalised by the casino. The player can raise a dispute to an ADR as per the terms and conditions.

5.3 Information related to complaints and disputes

As part of our regulatory obligations, it is important to clarify the role of the Curaçao Gaming Authority (CGA) in the complaints process. While players have the right to raise concerns directly with the CGA, it is important to understand that the CGA does not intervene in or make decisions on individual player complaints related to gambling transactions conducted on our websites. Instead, players must first follow the internal complaints procedure and, if unresolved, may escalate the matter to an approved Alternative Dispute Resolution (ADR) provider. The CGA will not review or overturn decisions made by the operator or ADR, unless the complaint is deemed to have been inadequately handled. However, players are not restricted from contacting the CGA directly regarding broader matters such as suspected malpractice, breaches of licence conditions, or whistleblowing concerns. While the CGA does not mediate individual disputes, it may use the information provided in complaints to support its supervisory and enforcement activities.

6 Complaint Resolution Process

All complaints will be handled confidentially, fairly, and in accordance with the principles outlined under Article 5.3 of the National Ordinance on Games of Chance (LOK) and our licence obligations. Our goal is to resolve issues at the earliest possible stage through open communication

6.1 Responsible Gaming Complaints

Complaints related to Responsible Gaming are treated with the highest priority due to their potential impact on player well-being and safety. Any complaint involving the protection of vulnerable players, the availability or timely implementation of self-exclusion or cooling-off measures, or the enforcement of responsible gaming tools and procedures as defined in the Responsible Gaming Policy, will be classified accordingly and handled with urgency. Trivico B.V will try its best efforts to resolve these complaints within five (5) business days.

Upon receipt of a Responsible Gaming complaint, Trivico B.V will:

1. Provide a written confirmation within 2 days of when the complaint was submitted.
2. Inform the player with a clear explanation of how the complaint will be processed
3. 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

6.2 All other complaint types

Trivico B.V is committed to handling all complaints in a timely and transparent manner.

1. Upon receipt of a complaint, the operator will, within one (1) week, provide the player with a written confirmation of receipt.
2. A clear explanation of the complaint handling process, and an indication of the average timeframe for resolution based on the nature of the issue. In general, complaints will be assessed and resolved within four (4) weeks from the date of receipt.

3. 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.

6.3 Artificial Intelligence (AI)

To enhance efficiency and consistency in the handling of player complaints, Trivico B.V may utilise artificial intelligence (AI) tools to assist in providing preliminary recommendations or solutions based on historical data and similar complaint patterns. This helps ensure that players with like-for-like complaints are treated fairly and consistently. However, the use of AI is limited to a supporting role, and every complaint will be subject to final review and resolution by a qualified human. This ensures that each case is assessed individually, with appropriate consideration given to its specific context and any nuances that may not be captured by automated systems.

7 Alternative Dispute Resolution (ADR)

In accordance with the licensing obligations under Article 5.3 of the National Ordinance on Games of Chance (LOK) and the requirements established by the Curaçao Gaming Authority (CGA), Trivico B.V is committed to offering players access to an independent and impartial Alternative Dispute Resolution (ADR) service, free of charge in Curacao. If a complaint cannot be resolved through our internal complaints process, the player is entitled to escalate the matter to a CGA-certified ADR entity. Full details of the ADR process, including how to initiate a claim and what to expect during the review, are clearly outlined in our Terms and Conditions, as required by regulation.

The company has entered into an agreement with at least one CGA-certified ADR provider, which has been duly submitted to the CGA Portal within the required one-month timeframe following the publication of the official ADR provider list. All costs associated with the ADR process are covered entirely by the company (The Operator), ensuring that no financial burden is placed on the player for seeking external resolution.

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.

It is important to note that once the ADR process is completed, the outcome is final, and the matter may not be reopened or reviewed by a different ADR entity, either by the player or us “The operator”. Should a player choose to withdraw from an ongoing ADR process, they will forfeit the right to raise the same dispute again at a later date.

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.

8 Record Keeping and Reporting

As an operator, Trivico B.V will:

1. Submit reports to the CGA on January 15th and June 15th based on complaints submitted to the operator since the previous reporting period by players using the Complaints submission form.
2. The report will summarise the below:
 - a) The total number of complaints made.
 - b) Total number of settled complaints (Upheld and rejected).
 - c) Number of pending and unresolved complaints,
 - d) Number of complaints by category.
 - e) Number of complaints referred to ADR.
 - f) Number and detail of complaints for which a player has taken legal action.
3. The company will ensure transparency and compliance with ADR decisions and regulatory updates.
4. Records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.
5. The company is aware that the CGA has the right to request, at any time, access to records of complaints received as well as any disputes that are pending resolution.

9 Terms and Conditions

The complaints procedure is visible on the website as a standalone policy, and information regarding the complaints procedure is listed in the terms and conditions.

10 Transition Deadline

The complaints policy has been uploaded and submitted to the CGA Portal before the 31st July 2025.
