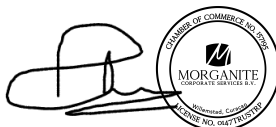


PLAYER COMPLAINTS POLICY
Inno Growth B.V.

Last update: July 21, 2025

Signed and approved by:
Norine J.E.Clifton,
on behalf of Morganite Corporate Services B.V.,
director of Inno Growth B.V.



1. Introduction

This Player Complaints Policy (hereinafter – the “Policy”) has been developed in accordance with the requirements of the National Ordinance on Games of Chance (LOK) and the Curaçao Gaming Authority (CGA) guidelines on player complaints and dispute resolution.

Inno Growth B.V., registration number 166117, with its registered address at Abraham de Veerstraat 1, Curaçao (hereinafter referred to as “we” or the “Company”), is committed to providing a transparent, fair, and accessible complaint handling process for all users across its domain, casibra.com, atom-casino.com (hereinafter – the “Domain”).

As a licensed operator under the jurisdiction of Curaçao, operating under license application number OGL/2024/807/0278, we recognize the importance of resolving disputes with players in a constructive and timely manner. Under this policy, players are entitled to submit complaints and, if necessary, escalate them to an independent Alternative Dispute Resolution (ADR).

All definitions that meet in this Policy have meaning as provided by LOK and CGA guidelines.

1.1 Player Interaction

Player Interaction refers to any written communication initiated by the player and directed to the customer support team, including inquiries, feedback, requests for assistance, or clarification. Such interaction is not always considered a complaint. A communication is classified as a complaint only when the player expresses dissatisfaction with specific actions of the operator and expects an official response or resolution.

1.2 Complaint

We strive to provide our players with the highest level of service. If you have any concerns regarding the operation of our platform, our terms, technical issues, or the actions of our staff, you may submit a written complaint. You may find a suggested list of grounds for filing a complaint in section 8 of this Policy. We are committed to reviewing it in accordance with our established procedure and providing a comprehensive response. To ensure an effective resolution, we kindly ask that you include all necessary information when submitting your complaint. Complaints may only be submitted by registered players. The right to submit a complaint cannot be transferred to third parties.

1.3 Dispute

If you are not satisfied with the outcome of our internal complaint-handling process, you have the right to escalate the matter to an independent authority. We are open to constructive dialogue and fully respect the player’s right to seek resolution through alternative dispute resolution mechanisms or legal proceedings.

1.4 Alternative Dispute Resolution (ADR)

We support a transparent and fair approach to conflict resolution. In cases where a dispute cannot be resolved directly, we offer the option to refer the matter to an independent ADR organization. This is an impartial process involving a third party that aims to reach a fair outcome without resorting to court proceedings. You may find more information on alternative dispute resolution (ADR) in the section 5 of this Policy.

2. Deadline for filing a complaint

You may submit a formal complaint within 6 months from the date the issue occurred.

- If the issue arose regarding a bet, the 6-month period starts from the moment the bet is settled.
- If the complaint concerns poker or other P2P (player-to-player) games, the countdown begins from the end of the game session.

For live betting, we strongly recommend submitting your complaint as early as possible, as certain data may no longer be available after a specific period of time, which may affect the sufficiency of the evidences and the outcome of the dispute resolution.

3. Filing a complaint

You can file a complaint by sending an e-mail to **support@casibra.com**, **support@atom-casino.com**, from the e-mail address that was provided when registering an account.

In the event that, after receiving a complaint or other message from a player in the live support chat, it is necessary to use another method of communication to complete the requested information (e.g., email or submitting a completed complaint form), the support representative will provide the player with all necessary information on the proper way to file a complaint and further means for communication.

We also provide a [complaint submission form](#), available for download on the respective Domain. The draft complaint submission form is attached to this Policy as Annex 1.

The complaint form should include:

- Your name, address, and country of residence;
- Account number;
- The date of the event and the date the complaint was filed (the date of filing a complaint will be considered the date of receipt of the relevant request from the player by our support service);
- Description of the situation;
- If necessary, supporting documents or screenshots.

We accept complaints in English and in the language of the site.

4. Time limits for consideration of complaints

We always try to respond as quickly as possible, but there are clear deadlines for different situations.

4.1 Responsible Gaming complaints

If your complaint is about responsible gaming (e.g. self-exclusion), we will send you a confirmation of receipt within 2 business days from the date of receipt a complain. You will receive a full response within 5 working days from the date of receipt a complain. If more time is needed for consideration,

the deadline may be extended, but not more than for 2 weeks - and we will definitely warn you about this.

4.2 Other types of complaints

In all other cases, we will send a confirmation of receipt of the complaint within 7 calendar days. A final response will be provided within 4 weeks. If the situation is complex and requires additional analysis, we can extend the deadline for another 4 weeks and will definitely explain the reason for the delay.

In any case, you will receive a written response with an explanation. If we need more information, we will contact you within the first four weeks. If you do not respond, the complaint may be closed as not eligible for further investigation.

5. Alternative Dispute Resolution (ADR)

If you disagree with our decision, you may refer your complaint to an independent Alternative Dispute Resolution (ADR) provider. ADR procedures are intended to offer a fair and impartial review of disputes.

The Curacao laws obliged us to provide our players an opportunity to submit free of charge claim to independent ADR provider from the list of ADR providers approved by the CGA. As of now, the Curaçao Gaming Authority has not yet published its official list of certified ADR providers.

Therefore, players may use other reputable and certified ADR entities that meet the required standards of transparency, independence, and professionalism at his/her own expenses. This Policy will be updated accordingly once the official list is released.

Please note: once the ADR process is completed, the same complaint cannot be submitted again through another provider. Additionally, if a player voluntarily chooses to withdraw from the process, the complaint will be considered closed.

6. CGA's Role and Complaint Handling

Curaçao Gaming Authority (CGA) does not review or make decisions on complaints related to gambling transactions. All such matters are handled directly by our team in accordance with the internal complaint procedure outlined above.

If you believe that we have breached regulatory requirements or violated the terms of our license, you have the right to contact the Curaçao Gaming Authority (CGA) directly. You may submit a complaint through the online form available on the official CGA website.

Please note that the CGA does not mediate individual disputes between players and operators. However, the information submitted may be used by the CGA as part of its supervisory activities to ensure that we comply with all applicable regulatory standards.

We, in turn, undertake to keep all received complaints for at least 5 years. We also report complaints to the CGA twice a year — on January 15 and June 15.

For more information or to submit a report, please visit the CGA's official website at: <https://www.gamingcontrolcuracao.org/>

7. Use of Artificial Intelligence (AI)

We may utilize artificial intelligence (AI) technologies during the complaint handling process; however, we strictly comply with established limitations and standards.

If a player's complaint is classified as related to responsible gaming (including matters such as self-exclusion, limits, interaction with vulnerable players, etc.), all communication with the player must be conducted exclusively by a human. AI must not be used in such cases.

Complaints that can reasonably be considered complex in nature or circumstances must also be handled solely by a human, not by AI systems.

8. Possible reasons for a complaint

You can file a complaint if you encounter one of the following situations:

- Delay in depositing or withdrawing funds;
- Unfair or opaque bonus terms and conditions;
- Unjustified account bans;
- Errors or failures while playing;
- Difficulties with verification (KYC);
- Incorrect processing of your personal data;
- Lack of responsible gaming measures;
- Technical problems with the site;
- Suspected fraud;
- Violation of license terms or platform rules.

This list is intended to help better formulate the basis for filing a complaint and streamline its processing by the support service, but does not limit the player's right to file a complaint for other reasons.

Annex 1

COMPLAINT SUBMISSION FORM**SECTION 1 – PLAYER IDENTIFICATION**

Full Name:	_____
Account Username / ID:	_____
Registered Email Address:	_____
Country of Residence:	_____
Residential Address:	_____
Phone Number (optional):	_____
Date of Birth:	_____

SECTION 2 – COMPLAINT DETAILS

Date of Incident:	_____
Type of Issue:	<u>Choose from the list</u>
Description of the Complaint:	_____
PLEASE NOTE: Submitting this form alone is not sufficient for complaint resolution. You must attach all relevant supporting documents (e.g., screenshots, transaction records, chat logs) when sending this form via email. Failure to provide adequate evidence may result in delays or rejection of your complaint.	

Have you previously reported
this issue to support?

☐ Yes

☐ No

If yes, date of last contact:

Language Preference:

SECTION 3 – DECLARATION

☐ I declare that the information provided above is accurate and complete to the best of my knowledge. I understand that the complaint may be closed if I fail to respond to requests for additional information, or if the information provided is proven false. I understand that I may escalate my complaint to an independent ADR body if I'm not satisfied with the final resolution. To do so, I must first contact support for guidance.

☐ I confirm that I am the registered account holder and that I am filing this complaint on my own behalf.

☐ I confirm that I have read, understood, and agreed to the Terms and Conditions and the Player Complaints Policy available on the respective website of the operator. I acknowledge that my complaint is submitted in accordance with the procedures and timeframes set forth therein, and I accept that my actions are subject to the rules, rights, and limitations outlined in these documents.

Signature (typed name): _____

Date of Submission: _____