

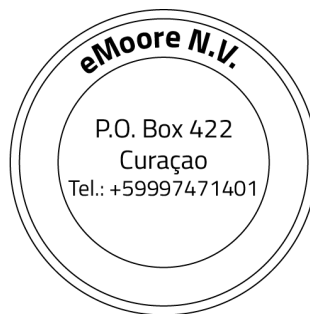
# LOWELL & PRUITT N.V.

registration number: 144786

registered address: Groot Kwartierweg 10, Livestrong Building, Curacao

## Complaint Handling Procedure Ver. 3.0. - JULY 2026

Signature: *C. Drommond*  
Name: C. Drommond, Proxyholder of eMoore N.V.  
Date: July 30, 2026



# Revision History

| <b>Version №</b> | <b>Effective date</b> | <b>Approving official</b> | <b>Responsible officer</b> | <b>Next review date</b> | <b>Comments</b> |
|------------------|-----------------------|---------------------------|----------------------------|-------------------------|-----------------|
| 1.0              | July 18, 2025         | Emoore N.V.               | Compliance function        | July 18, 2026           |                 |
| 2.0              | July 30, 2026         | Emoore N.V.               | Compliance function        | July 30, 2027           |                 |
| 3.0              | July 18, 2026         | Emoore N.V.               | Compliance function        | July 19, 2027           |                 |

## Complaints Policy

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under Article 5.3. of the National Ordinance on Games of Chance and the Player Complaints Policy Guidelines version 1.0, of 16 June 2026, by the Curaçao Gaming Authority (“CGA”).

The Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

### Definitions

|                       |                                                                                                                                                                                                                                                         |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ADR:                  | Alternative dispute resolution (“ADR”), which is offered in accordance with the ADR policy, issued by the CGA.                                                                                                                                          |
| ADR entity:           | The alternative dispute resolution entity that the Company has signed an agreement with to provide their players with ADR services.                                                                                                                     |
| Company:              | Lowell & Pruitt N.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under registration number 144786.                                                                    |
| 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.                                                                                                                                                        |
| Dispute:              | a Complaint that has not been resolved to the Customer's satisfaction through the Company's internal complaints process and has been escalated, either within the Company or to an independent third party (such as an ADR provider or a court of law). |
| Player Interaction:   | any written communication initiated by a player and directed to the Company's customer service team, including general enquiries, feedback, or requests for information, assistance, or clarification.                                                  |
| Registered Player:    | 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.                                                                                                                                   |

## 1. Complaints submission process

The Customer Support Team handles all Customer inquiries, ensuring prompt and high-quality responses. Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint.

In the case of P2P (such as poker) or ante post fixed odds betting the six-month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager.

Customers are entitled to submit complaints regarding in-running sports betting within six months of the relevant event. However, they should be advised that, due to the nature of in-running betting, certain data critical to the investigation may only be available for a limited time. Accordingly, it may be necessary to raise such complaints promptly. The operator cannot reasonably be expected to retain specific data indefinitely where it is no longer feasible to do so.

If the Complaint is initiated after the six-month period, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.

### Stages/Escalation of Complaint Resolution

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.

If you have a concern or dispute, please contact our Customer Support team as a first step.

You can reach us via:

- Email
- Live Chat

If your issue is not resolved through initial support, you may submit a formal complaint which is available in English and the language of the website you are using. To submit a complaint please download **the form**, fill it in, and email to us.

The form will ask for the following details:

- Your full name, address, and country of residence
- Your account number/account name (if applicable)
- The date of the complaint and the date of the issue or disputed event
- A clear description of the issue, selected from the Company's predetermined Complaint category topics, where applicable
- Amount in dispute
- URL

We may request documents to support your complaint. Any request will be reasonable and only made if necessary to help resolve your issue effectively.

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.

If you're not satisfied with our final response, you have the right to escalate your complaint to an approved Alternative Dispute Resolution (ADR) provider.

## **2. Role of the CGA**

The CGA will not resolve or make decisions on any player complaints regarding gambling-related transactions on the operator's website(s).

Unless deemed to be inadequately handled, the decisions made by the operator and/or ADR provider will not be subject to reviewing and/or overturning by the CGA.

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

## **3. Complaint Resolution Process**

Timeline: Responsible Gaming Complaints

Complaints related to responsible gaming will be prioritized due to potential impacts on player well-being. Complaints should be categorized as related to responsible gaming in any case where they concern vulnerable players, the availability and/or timely implementation of self-exclusion and/or cooling-off, and the mandated consequences therein as outlined in the Responsible Gaming policy.

We aim to resolve such complaints within five (5) business days whenever possible.

Upon receiving a responsible gaming complaint, we will respond within two (2) days to:

- Confirm receipt of the complaint in writing
- Explain how the complaint will be processed
- Provide an estimated timeframe for resolution

If more time is needed to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two (2) weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two (2) weeks.

Timeline: All Other Complaint Types

The Company will assess and respond to complaints within four (4) weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the player.

Within one (1) week of receiving a complaint, the operator will:

- Confirm receipt of the complaint in writing
- Explain how the complaint will be processed
- Provide an estimated timeframe for resolution

#### **4. Complaint Response and Resolution**

Every player who submits a formal complaint will receive a final written response.

The response will be either:

- A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
- Detailed reasons for not handling the complaint. If we need additional information from you to address your complaint, we will request it within four (4) weeks of receiving your complaint. If you do not provide the required information within this timeframe, we may be unable to proceed and the complaint may be closed or rejected.
- If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to an independent ADR entity.

#### **5. Alternative Dispute Resolution (ADR)**

In accordance with our licensing obligations under the LOK framework, we provide access to independent and free Alternative Dispute Resolution (ADR) services for all players.

The Company is engaging with the independent ADR entity - Resolvo N.V. which is an approved ADR entity by the CGA, to provide the Company's Customers with a possibility to escalate their complaints if they are not satisfied with the Company's conclusion of their reported complaint.

Any complaint or dispute, shall be resolved through Company's complaints procedure prior to pursuing any other legal or equitable remedy. If a complaint or dispute is not resolved through the Company's internal complaints procedure, such unresolved complaint or dispute may be referred to Resolvo N.V., to be settled by binding alternative dispute resolution. The alternative dispute resolution proceedings are free of cost for the player. For information regarding the alternative dispute resolution procedure and Resolvo N.V., visit [www.resolvocuracao.com](http://www.resolvocuracao.com) or send an email to: [info@resolvocuracao.com](mailto:info@resolvocuracao.com).

In line with CGA guidance, and to help ensure the effective use of ADR mechanisms, a minimum claim amount of EUR 5.000 has been established for a claim to be eligible for escalation to ADR, or if the complaints concern a responsible gaming issue. This threshold has been introduced to prevent misuse of the ADR process and to ensure resources are directed toward meaningful disputes.

The ADR has a discretion to refuse to take a case in circumstances where:

- The Complaint handling process has not been fully completed in accordance with the Customer;
- Complaints Policy set out by the CGA;
- The Dispute is evidently frivolous or vexatious;
- The Dispute falls outside acceptable ADR Parameters set by the Company;
- The Dispute is currently under consideration by another ADR provider or a court;
- The Dispute has already been reviewed by any CGA accredited ADR provider and a decision has been reached;
- The Customer is resurrecting a Dispute that has already commenced ADR with any CGA accredited ADR provider, however it was terminated by that ADR provider due to lack of

- engagement by the Customer or it was otherwise declined other than for reasons of conflict of interest;
- Conflict of interest.

Once the ADR process is completed, it cannot be restarted with a different ADR provider - by either the player or the operator.

If a player voluntarily withdraws from an ADR process after it has started, the dispute may not be reopened at a later time.

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.

In the event that the player wishes to proceed with legal action, they must first try to resolve the dispute via the ADR operator. Only once this step is completed and the player is not satisfied with the outcome, they can proceed to submit legal action.

The information to contact the ADR operator is noted on the domain and with a note that all of the Company's complaint processes should be exhausted before they can contact the ADR operator to further their claim.

The ADR process is expected to take no more than 90 days (3 months) from the initial referral of the Dispute to its completion.

## **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.

ADR service providers engaged by the Company have their own reporting obligations in accordance with the Alternative Dispute Resolution policy issued by the CGA.

Records of unresolved Complaints and/or Complaints that have been escalated to ADR or legal proceedings will be kept for five (5) years 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.

## **7. Reasons for Complaint**

The player has the right to make a complaint regarding any part of their relationship with the operator, or any incident related to their participation in a game of chance. This includes (but is not limited to):

- Deposit issues
- Withdrawal issues

- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of player balances
- KYC and Verification
- Data Protection
- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation
- Unfair terms and conditions