

Player Complaints Handling Procedures

The Elite Turf Club N.V.

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1 Objectives

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, of the Curaçao Gaming Authority ("CGA"). This policy provides an overview of the straightforward and effective complaint and dispute resolution process.

In this Policy is reflected the way Registered Players can address their complaints and how these are handled.

2 Definitions

ADR:	Alternative dispute resolution ('ADR'), which is offered in accordance with the ADR policy as is to be issued by the CGA.
Complaint:	a written expression of dissatisfaction by a customer, relating to the Company's services decisions, terms or conducts, whereby the player expects a response or resolution.
Registered Player:	a customer who has completed the registration process, provided all required information, agreed to the terms and conditions, and whose account has been approved and activated.

3 Complaints Procedure

All Registered Players are known to the Company. The Company has approximately seventeen (17) Registered Players with who the Company has regular contact.

The support team of the Company handles all Customer inquiries, ensuring prompt and high-quality responses.

If a Registered Player has a Complaint, the support team can be contacted directly to express their dissatisfaction about the services of the Company. All Registered Players can contact the support team directly by email or telephone, any time up to six months of the settlement of the bet or the incident.

An official complaint submission form will be made available to the Registered Player for completion and emailed to the Company. The Company may request additional supporting information or documentation in relation to the complaint.

The support team of the Company is required to investigate each Complaint in order to solve the matter as soon as possible. The support team is required to acknowledge the

Complaint of the Registered Player and inform the Registered Player of the status of investigation within one (1) week after the date of submission of the Complaint.

If the support team can't solve the Complaint the board of the Company will be informed to act accordingly. The Registered Player will be informed about the status of the handling of the Complaint including expected timeframe.

The Company's aim is to solve the Complaint within four (4) weeks after the date of submission of the Complaint. The Registered Player will always receive a final determination of the Complaint in writing.

If the Complaint is related to responsible gaming, then the Company will use its best efforts to solve this matter within five (5) business days. The Company will inform the Registered Player about the receipt of the Complaint in writing, will provide an explanation on how the Complaint will be processed and will provide notice of the average timeline for resolution of the complaint, within two (2) business days of receiving such complaint.

If the Company needs more time to make a reasonable and informed decision, the Registered Player will be informed about the delay, but the period cannot exceed two weeks.

4 Alternative Dispute Resolution

As required under the LOK the Company will be engaging an independent ADR entity in Curaçao, approved by the CGA.

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 Registered Players to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure.

5 Record Keeping

As required under the Player Complaints Policy Guidelines version 1.1. of June 18th 2025 the Company shall submit twice per year a report to the CGA detailing any Complaints and their outcomes, where known.

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.
