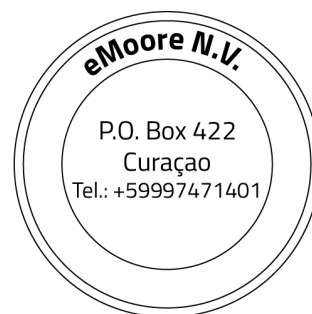


Player Complaints Handling Procedures

The Elite Turf Club N.V.

Drafted and approved on July 30, 2026

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Date: July 30, 2026



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Revision History

Version#	Effective date	Approving official	Responsible officer	Next review date	Comments
1.0	July 31, 2025	eMoore N.V.	Compliance function	July 31, 2026	
1.1	July 30, 2026	eMoore N.V.	Compliance function	July 31, 2027	

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 a view over the process to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution services prioritizing quality and independence.

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.
ADR entity:	The alternative dispute resolution entity that the Company has signed an agreement with to provide their players with ADR services
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.
Dispute:	A dispute is a Complaint that has not been resolved to the player's satisfaction through the internal complaints process.
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. All Registered Players are known to the Company. The Company has approximately seventeen (17) Registered Players with who the Company has regular contact.

3 Complaints Procedure

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 the 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 complaint is related to responsible gaming, e.g. complaints regarding self-exclusion, cooling-off period, gaming addiction, then the company will use its best efforts to resolve these cases within five business days.

Within 2 business days of receiving such complaint the Company will inform the Registered Player about 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.

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. However, if a delay is caused due to lack or slow response from the Registered Player (not reacting within 1 working day), the resolution period may be extended by no more than two weeks.

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.

4 Alternative Dispute Resolution

In the event a complaint can't be resolved through the regular complaint procedure, Registered Players shall have the right to refer the matter to an independent ADR entity. This service shall be provided at no cost to the player, with all associated expenses borne by the Company.

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

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 players with a possibility to escalate their complaints to if the players are not satisfied with the Company's conclusion of their reported complaint.

The role for the ADR provider will be to deliver decisions that are well-sustained based on evidence and reasoned analysis. Ensuring independence, impartiality and sufficient expertise in handling disputes. Guaranteeing transparency and fairness thereby ensuring compliance with applicable regulatory requirements. Establishing the duties to each party regarding actioning the decision. Establishing whether or not publicity is permitted.

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

- The Complaint handling process has not been fully completed in accordance with the Player Complaints Policy set out by the CGA.
- The dispute is evidently frivolous or vexatious.
- The dispute falls outside acceptable ADR Parameters set by the operator.
- The dispute has already been reviewed by any CGA accredited ADR provider and a decision has been reached.
- The player 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 player or it was otherwise declined other than for reasons of conflict of interest.
- Conflict of interest

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.

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.

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.
