Approved by: 10/27/2025

eMagnus Curacao B.V.
Director of
Olistek N.V.

# Player Complaints Policy

## 1. Policy Overview

This Player Complaints Policy ("Policy") establishes a comprehensive framework for managing player complaints in full compliance with Article 5.3 of the National Ordinance on Games of Chance (*Landsverordening op de kansspelen*, "LOK") and the requirements set forth by the Curaçao Gaming Authority ("CGA").

Our commitment is to provide all players with access to a transparent, fair, and efficient complaint resolution process, including free alternative dispute resolution ("ADR") services that prioritize quality and independence.

## 2. How to Submit a Complaint

### 2-1. Complaint Window

If you encounter any issue or are dissatisfied while using the Operator's services, we direct you to first contact our customer support team via email or use our live chat option to receive assistance with your request. You may find the contact details of the customer support team in Section 8 "Contact Information" below.

If you believe your assistance request remains unresolved, you may lodge a formal complaint free of charge at any time up to six months from the incident about which you wish to make a complaint.

For the avoidance doubt, please note that:

- For peer-to-peer games (such as poker) or ante post fixed odds betting, the six-month period begins after bet settlement or conclusion of the specific event.
- For in-running sports betting complaints, we recommend prompt action as investigation data may have limited availability (due to the nature of in-running betting, where data may no longer be available after a short period).

### 2-2. Who Can Complain

Complaints can only be made by the registered player. Third-party complaints will not be accepted.

### 2-3. Types of Complaints We Handle

You have the right to make a complaint regarding any aspect of your relationship with us, including but not limited to:

1. Deposit issues;
2. Withdrawal issues;
3. Bonus terms and conditions;
4. Account closures or restrictions;
5. Alleged errors or unfairness in game outcomes;
6. Responsible gaming issues;
7. Treatment of player balances;
8. KYC and verification processes;
9. Data protection matters;

10. Technical or software issues;
11. Anti-money laundering (AML) concerns;
12. Issues involving minors;
13. Fraudulent games;
14. Fraudulent practices;
15. License or regulation queries;
16. Unfair terms and conditions.

### 2-4. Official Complaint Submission

To file a complaint, you must complete our Official Complaint Submission Form available through a downloadable form: [link to downloadable form]. For your convenience, the downloadable form is available in English and also in [local language if any].

In the Official Complaint Submission Form, you must fill in the required information, including:

- Your name, address, and place of residence;
- Your account number;
- Date of the complaint and date of the disputed event;
- Description of the conduct being disputed;
- Supporting documentation, corroborating your complaint.

Please complete the Official Complaint Submission Form and direct it to the customer support team. You may find the contact details of the customer support team in Section 8 "Contact Information" below.

## 3. Complaint Review Process

### 3-1. Key Timelines

Upon receiving your complaint, we will promptly handle it as per the category of the complaint. For clarity, there are two categories of complaints:

a) **Responsible Gaming complaints** – these complaints are given priority due to their potential impact on player's well-being. Once we receive such a complaint, we will acknowledge it within two business days of receipt, provide an explanation of how the complaint will be processed, and provide notice of the average timeline for resolution. We will aim to resolve it within five business days, subject to it relating to Responsible Gaming issues. If more time is needed, we will inform you in writing, and the resolution period may be extended up to a maximum of two weeks. If a delay is caused by slow responses from the player, this period may be extended by an additional two weeks.

   For the avoidance of doubt, Responsible Gaming complaints typically concern issues such as: the targeting of vulnerable players, the availability and implementation of self-exclusion, cooling-off periods and their consequences, or any other matter.

b) **All other complaint types** – will be considered on a rolling basis. Once we receive such a complaint, we will acknowledge it within one week of receipt, provide an explanation of how the complaint will be processed, and provide notice of the average timeline for resolution. We will aim to resolve these complaints within four weeks. If the issue is particularly complex or requires additional information, we may extend the resolution period

by up to four additional weeks, with prior written notice. In case the player does not cooperate and/or does not provide requested documents within the initial four weeks, the Operator may reject the complaint.

For the avoidance of doubt, you may find a non-exhaustive list of issues you can submit a complaint about in Section 2-3 “Types of Complaints We Handle” above.

### 3-2. Response and Resolution

You will receive a final determination of your complaint in writing via email. This response will include either a reasoned assessment with supporting evidence (if any), a detailed explanation for not handling your complaint (for example, due to non-cooperation and/or non-provision of requested documents by the player), or information about further steps you may take if you remain unsatisfied.

## 4. Alternative Dispute Resolution (ADR) and Consequences

If you are unsatisfied with the decision, you have the right to escalate your complaint to an independent ADR provider with no additional fee. You may find detailed information about the ADR process, how to make a submission to the ADR Provider, and what the relevant contact details of the ADR Provider are, in our Terms & Conditions (link).

We note that the ADR process is impartial and independent. The ADR Provider’s decision is binding on the Operator and you, but does not affect your right to pursue further legal or judicial recourse. Importantly, only one ADR process is allowed per complaint, and once ADR is completed or withdrawn (for example, the client drops out of the process), the same issue cannot be re-submitted to ADR.

## 5. Role of the CGA

Please note that the CGA does not resolve or make decisions on individual player complaints regarding gambling-related transactions. However, you may contact the CGA directly if you believe such matters as, including but not limited to, occurred: suspected malpractice by the Operator, a breach of license conditions by the Operator, or if you have whistleblowing concerns.

## 6. Record Keeping and Reporting

Please note that we maintain comprehensive records of all complaints and provide reports to the CGA. Rest assured that your complaint information will be kept confidential and secure, used solely for regulatory reporting purposes, retained for five years or as required by applicable laws.

## 7. Your Rights

As a player, you have the right to:

- Submit complaints free of charge;
- Receive timely acknowledgment and resolution;
- Access ADR services;
- Take legal action (subject to applicable terms);
- Contact the CGA regarding regulatory matters;
- Be treated fairly and with respect throughout the process.

## 8. Contact Information

Customer support:

- Email: [insert email address]
- Live Chat: Available 24/7 on our Website

## 9. Policy Updates

This Policy may be updated from time to time to reflect regulatory changes or improvements to our processes. We ask you to keep yourself informed about any such changes.

## 10. Acknowledgment

By being a registered player, you acknowledge that you have read, understood, and agree to this Player Complaints Policy. This Policy forms part of our Terms & Conditions and is governed by the same legal framework.

For questions about this Policy, please contact our customer support team.