

Complaints Policy

Stake

Key Information	
Approving Official(s)	General Counsel, Head of Operations
Responsible Office	Complaints Team
Effective Date	20 December 2024
Next Review Date	20 December 2025

1. Introduction/Purpose

This Complaints Policy (“**Policy**”) sets out the procedures and standards by which Medium Rare N.V. (hereinafter “**Stake**” or the “**Company**”) receives, manages, and resolves complaints submitted by end-users in accordance with Article 5.3 of the National Ordinance on Games of Chance (“**LOK**”) of Curaçao and with the Provisional Online Gaming License Conditions of the Curacao Gaming Authority. This Policy applies to all complaints related to the player’s experience with any Game of Chance offered by the Company.

2. Scope of Policy

This Policy applies to Stake and specifically its Customer Support channels and teams and any other team which has direct or indirect contact with customers.

3. Submitting a Complaint

3.1 End-users may submit a complaint free of charge within six (6) months of the occurrence of the incident that gave rise to the complaint.

3.2 To submit a complaint, players have the option to request from support@stake.com, the official complaint form provided by the Company. This form complies with the Curaçao Gaming Authority (CGA) guidelines and must include the following:

- Full name of the complainant.
- Residential address and place of residence.
- Date of the incident.
- Factual description of the behavior or incident being complained about; and
- Complaints must be submitted in English.

3.3 The complainant may submit their complaint through email, specifically complaints@stake.com or support@stake.com.

3.4 If the information provided is insufficient to investigate the complaint, the Complaints Team will notify the player promptly and request additional information required to proceed.

4. Acknowledgment and Initial Response

Within one (1) week of receiving a complaint through either medium in Section 3, the Complaints Team will:

- Send a written acknowledgment of receipt to the complainant
- Provide a clear explanation of the complaints handling process

5. Compliance Handling and Decision

5.1 The Complaints Team will assess and investigate the complaint fairly and objectively.

5.2 Within four (4) weeks of receiving the complaint, we will provide the complainant with a written response, which will include:

- If the complaint is not accepted for processing, the reason for this decision;
- If the complaint is accepted for processing, a written final decision supported by relevant evidence and findings

5.3 If additional time is required due to complexity or unforeseen circumstances, the complaint response period may be extended once by up to four (4) additional weeks. In such cases, the complainant will be informed in writing of the extension and the reasons for it.

5.3.1 - If the Complaints Team deem that the response time is required to be extended, they will raise this matter with their manager who will then determine the outcome of the complaint, based on the facts or escalate further.

5.4 If the complaint is deemed to be of a serious nature or a potential legal risk, the complaint/dispute will be escalated to the Legal & Compliance Team who will assess each case and decide the appropriate course of action.

6. Alternative Dispute Resolution (ADR)

6.1 If the complainant is dissatisfied with the final decision or wishes to pursue further resolution, access to an independent Alternative Dispute Resolution body is always available to the complainant.

6.2 If the complainant wishes to take up ADR, it:

- Will be provided at no cost to the complainant; and
- Does not affect the complainant's right to seek redress through judicial means.

7. Reporting

7.1 The Company may be required to report on the outcome of a specific complaint. If required, the communications with the regulator will be handled by the Legal & Compliance team exclusively to maintain consistent communication.

8. Record Keeping

8.1 The Company maintains detailed records of all complaints for a minimum period of five (5) years. These records include:

- A copy of the original complaint.
- Correspondence with the complainant.
- The final decision or outcome; and
- Any escalation to ADR.

8.2 Records are stored securely and may be made available to the Curaçao Gaming Authority (CGA) upon request.