

TH GAMBLING N.V.

Player Complaint Procedure

2025-07-24

Version Tracking, Release and Changes

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TH Gambling N.V. (the “Company”) is dedicated to providing a fair, enjoyable, and transparent gaming experience for all players. Recognizing the importance of player feedback and the resolution of disputes, we have established a comprehensive Player Complaint Procedure. This procedure ensures that all complaints are addressed respectfully, thoroughly, and promptly.

1. Policy Overview

- 1.1 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 National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”) issued by Curacao Government Authority (CGA).
- 1.2 The Company’s 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.
- 1.3 This policy is clearly stated, visible and added to the website(s) operated and licensed by The Company
- 1.4 The Complaints Policy “the policy” has been published as a “standalone” document with forwarding link(s) from the website homepage and/or registration page.
- 1.5 The Company will require by reading carefully, acknowledging, understanding the policy, at intentionally by its own discretion and subject to compliance with applicable private law, require by the player/user to explicitly confirm acceptance of the Complaints policy by clicking and accepting with tick box.
- 1.6 The Company (we, the company, Licensee), include acceptance of the Complaints policy as part of the registration process.

This Complaints Policy is based on regulatory requirements under the National Ordinance on Games of Chance. 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 legislation. The Complaints Policy of The Company guarantees players access to a straightforward and effective dispute resolution process, including free alternative dispute resolution (ADR) services for the end users/players/registrants that prioritize quality and independence. TH Gambling N.V. aim is to ensure that all customers always have a great experience when using our services. However, we recognise there are occasions where we may not have been able to meet

your/their expectations, and in doing so, we want to hear from you as soon as possible so we may resolve your concern quickly and fairly. Our customer service team is highly trained to resolve any queries in order to provide a satisfactory outcome. On the rare occasions where this is not possible, you can request for your complaint to be escalated to a senior team member, who will independently review and seek resolution to your complaint. In accordance with Article 5.3 of the LOK, further rules, policies, and guidelines regarding complaints and ADR processes may be established. Execution of this Complaints policy is the responsibility of the operators Compliance Role representative.

2. Purpose & Scope

This policy establishes a fair, transparent, and effective framework for lodging, handling, and resolving player complaints in compliance with Article 5.3 of Curaçao's National Ordinance on Games of Chance ("LOK") including access to independent Alternative Dispute Resolution (ADR)

3. Key Definitions

- **Player Interaction:** Any written contact initiated by a player (feedback, service enquiries)
- **Complaint:** A written expression of dissatisfaction, specifically submitted via Complaint Submission Form or escalated to ADR
- **Dispute:** A complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organization or to an independent third party.

4. Reasons for a Complaint

There are several reasons that the player can file a complaint. These are listed as below:

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
9. Data Protection
10. Technical or Software issues
11. AML concerns
12. Fraudulent markets/races
13. Fraudulent practices
14. License or regulation

5. Complaint Submission Process & Time Limits

- Players may file complaints free of charge **up to 6 months** after the disputed incident
- Only a registered player can file a complaint.
- Complaints must be submitted through an email by way of an official Complaint using the complaint submission form (ANNEX), found on the website.
- The email must include player identity, account number, date, description of the issue, language preference (English or local), and supporting documents.

6. Complaint Resolution Process

Stage 1 - Internal Resolution

- Player submits complaint via form; automatically acknowledged.
- Handled by customer service via **live chat or email**.

Complaint Acknowledgement

Within **one week**, the Company must:

1. Confirm receipt of the complaint.
2. Outline the processing procedure.
3. Provide an estimated timeline for resolution.

Complaint Resolution Timeline

The Company will ensure that it adheres to the following timeline:

- It has four weeks to respond, extendable once by another four weeks with written notice.

- The final response must be in writing and include either:
 - » A reasoned outcome with evidence; or
 - » Reasons for not handling the complaint, including any request for further information.
- **Responsible gambling-related complaints** (e.g., self-exclusion) will receive priority preference and is aimed to be resolved within **5 business days**. If more time is needed, the player will be duly notified.

Stage 2 - ADR Escalation

- If unresolved, player may escalate to a CGA-certified **Alternative Dispute Resolution (ADR)** provider.
- ADR services are **independent**, at **no-cost to players**, and **paid for by the Company**
- Players have the right to escalate matters of regulatory breach to the CGA via their **online form**.

The Company will ensure that it:

- Provides players **free access** to an **independent CGA-certified ADR provider**.
- Will include ADR details in all complaint correspondence and in the organisations Terms and Conditions.

7. Timeframes

Complaint Type	Internal Resolution	Extension	ADR Escalation Window
Responsible Gambling Issues	5 business days	—	Immediately if unresolved
Other Complaints	4 weeks	+4 weeks	After internal process

8. Reporting & Oversight

- The Company will submit **semi-annual reports** to CGA detailing:
 - Number of complaints received
 - Outcomes
 - ADR referrals
 - Any related legal proceedings
- The CGA does **not intervene in individual cases**, but uses risk-based data monitoring for compliance

9. Policy Publication & Compliance

- This Complaints policy has been uploaded to the CGA portal, as required by Clause 9 of Version 1.1
- The policy must be referenced in Terms & Conditions and/or linked from homepage/registration pages.
- The Company may require players to **explicitly accept** the policy at registration

10. Roles & Responsibilities

- **Customer Support:** First-line complaint resolution.
- **Specialized Staff:** Handle responsible gambling and complex cases.
- **Compliance Officer / ADR Liaison:** Oversees ADR referrals, ensures CGA reporting.
- **Management:** Ensures policy publication, updates, and staff training.

11. Record-Keeping & Quality Control

The Company will maintain a log of every complaint with date, channel, nature, resolution, and timelines. For escalated ADR cases, the Company will maintain documentation of ADR provider, decision date, and outcome. The Company will Monitor trends, analyze root causes, and implement corrective actions where necessary.

12. Enforcement & CGA Supervision

- Failure to comply may lead to CGA enforcement actions under LOK, including fines, sanctions, or license suspension
- CGA may revoke or downgrade licenses where complaint-handling breaches are systemic

13. Continuous Improvement

- This policy is subject to annual review or upon CGA updates.
- The Company may collect player feedback on the applicable process for improvement, where necessary.

ANNEX

Player Complaint Submission Form

Please complete this form to submit a formal complaint. Email the completed form to:

contact@arcanebet.com

Full Name:

Residential Address:

Place of Residence:

Email to reply to: _____

Date of Complaint: ____/____/____

Date of Incident (Bet/Event): ____/____/____

Category of Complaint (please tick one):

- ☐ Deposit Issue
- ☐ Withdrawal Issue
- ☐ Bonus Terms
- ☐ Account Closure/Restriction
- ☐ Game Error/Unfairness
- ☐ KYC/Verification
- ☐ AML/CTF Concern
- ☐ Data Protection
- ☐ Technical Issue
- ☐ Responsible Gaming
- ☐ Other

Description of Complaint:

Supporting Documentation (please list any attached documents):

Submit your completed form and attachments to: **contact@arcanebet.com**