

TH GAMBLING N.V.

Alternative Dispute Resolution Policy

2025-09-06

Version Tracking, Release and Changes

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1. Purpose & Scope

To ensure fair, transparent, and efficient resolution of player operator disputes, this Policy sets out a structured ADR framework. It applies to all disputes arising between licensed operators and players under the LOK, except where matters are resolved via operator internal process or excluded by jurisdiction, regulatory rules, or monetary thresholds.

2. Complaint Submission & Time Limits

- **Time window:** Players may submit formal complaints **within six months** of the disputed event.
- **By player only:** Only the player may file the complaint; on behalf submissions require proof of valid mandate.
- Complaints must include player's full name, valid email, ID, and a clear, coherent description via the platform's "seal" or official channel. Failure to meet requirements results in dismissal without operator notice.

3. Operator's Internal Resolution Process

- The Company must provide an official complaint form, in English and the operative website language.
- **Internal resolution first:** Via customer service (live chat or email).
- **Responsible gambling complaints** (e.g. self-exclusion breaches) must be handled within **5 business days**. Other complaints within **4 weeks**, with a single possible extension of 4 more weeks upon prior notice to player.

4. Escalation to Independent ADR

- If unresolved by the Company, players may escalate to a **CGA-approved independent ADR provider**, at no cost to the player.
- ADR providers must be **based in Curaçao**, legally separate from operators, operate standalone accessible websites, and feature a team including at least one qualified lawyer plus three staff with gambling industry experience.

5. ADR Eligibility & Process Rules

- Disputes must involve first attempting internal resolution and be submitted within one year of original complaint. Most monetary thresholds apply (e.g. min USD 50 to USD 500,000), as well as exclusion of frivolous cases or those already before courts/other ADR bodies.
- Once validated, both parties are notified within 7 calendar days, and the dispute enters ADR, which cannot be withdrawn thereafter.
- ADR providers may facilitate mediation or conclude binding arbitration/adjudication using submitted evidence only—they have no independent investigative authority.

6. Timeline & Notification

- ADR providers must acknowledge receipt within **3 working days**, notify the operator, and request evidence. Operators must respond within **14 days**.
- ADR decisions should generally be issued within **90 days** from the date all evidence is received. Extensions may be granted for complex cases, with updates provided every 30 days.

7. Decision & Appeal

- ADR decisions are binding on operators but **do not waive player rights** to pursue court action.
- Decisions reflect expert tribunal (typically 3 independent experts) and are documented with justification, legal basis, and instructions for implementing outcomes.
- Optional appeals permitted (if part of ADR scheme) via designated appeals commission-e.g. within 7 days, providing new evidence or motivation.

8. Confidentiality & Information Sharing

- Throughout ADR, parties commit to confidentiality. ADR providers may Forward sensitive or systematic issues revealed in cases to the CGA, to support oversight.

9. Reporting & Compliance

- This policy is uploaded to the CGA portal by **31 July 2025**.
- **Semi-annual reports** summarizing number and types of complaints, ADR referrals, outcomes, and legal actions are also reported to the CGA.

The CGA in turn uses this aggregated data to monitor compliance; it does **not intervene in individual grievances**.

10. Integration With Operator T&Cs

The Company's Terms of Service include how to submit complaints (7 days for game outcome disputes; 1 month for other account-related matters).

The T&C also specify arbitration referral for unresolved disputes, with binding arbitration initiated within **365 days** of session date.

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