

PLAYER COMPLAINTS PROCEDURE

CARLITTA N.V.

Registration No. 162777

Registered address: Zuikertuintjeweg Z/N (Zuikertuin Tower), Curaçao

Gaming License No. OGL/2024/1516/0841

Signed on behalf of Carlitta N.V.:

Name: FO Management LTD

Position: Director



Date: 28.07.2025

1. Purpose and Scope

We are committed to ensuring a transparent, accessible, and fair process for resolving any complaints you may have, as required under Article 5.3 of the *National Ordinance on Games of Chance* (LOK). This Player Complaints Procedure (the “**Procedure**”) outlines the processes available to players who wish to raise concerns or complaints regarding our services or gaming activities.

Please note that only registered players – those who have created an account with us and agreed to our Terms and Conditions – are eligible to submit a formal complaint. Complaints submitted by unregistered individuals, third parties, or on behalf of another person will not be accepted.

This Procedure ensures that the players have access to:

- A structured compliant resolution process with clear timelines;
- A dedicated Complaint Submission Form;
- Priority treatment for Responsible Gaming issues;
- Free access to an independent Alternative Dispute Resolution (ADR) provider;
- Oversight by the Curaçao Gaming Control Board (CGA) for regulatory matters.

2. Definitions

For the purposes of this Procedure, the following terms shall have the meaning set out below:

Alternative Dispute Resolution (ADR) – a process whereby an unresolved Complaint is escalated to an independent third-party entity certified by the CGA, for a binding decision.

Complaint – a written expression of dissatisfaction by a player relating to our services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution. A complaint is considered official when submitted using our Complaint Submission Form or escalated to an Alternative Dispute Resolution provider.

Dispute – a complaint that has not been resolved to the player’s satisfaction through our internal complaints process and has been escalated - either within the organization or to an independent third party, such as an ADR provider or court of law.

Player Interaction - any written communication initiated by a player and directed to our customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification, but does not constitute a formal complaint unless submitted through the designated process.

Responsible Gaming Complaint – a Complaint concerning matter related to player protection, including self-exclusion, cooling-off periods, or potential harm to vulnerable players.

3. Filing a Complaint

We value all interactions with our players and aim to address your concerns promptly and effectively. However, please note that Player Interactions do not constitute a formal complaint unless properly submitted as described below.

As a user, you have the right to submit a complaint free of charge within **six (6) months** of the incident or game outcome you are disputing. For peer-to-peer games (e.g. poker) or ante-post fixed odds bets, the six-month period begins after settlement or conclusion of the event. For in-running sports betting complaints, we recommend submitting your Complaint as soon as possible, as relevant game data may no longer be available after a short period due to technical limitations. We are not expected to retain such data beyond what is reasonably practicable.

Valid reasons to submit a Complaint include, but are not limited to:

- Deposit issues;
- Withdrawal issues;
- Bonus terms and conditions;
- Account closures or restrictions;
- Alleged errors or unfairness in game outcomes;
- Responsible Gaming issues;
- Treatment of player balances;

- KYC and Verification;
- Data Protection;
- Technical or Software issues;
- AML concerns;
- Issues with minors;
- Fraudulent games;
- Fraudulent practices;
- License or regulation;
- Unfair Terms and Conditions.

To submit a Complaint, you must complete the **Complaint Submission Form** via this link: [Insert form link]. This form must be submitted in **English or in the language of the website or domain you used when accessing the services**.

Your complaint form must include:

- Your full name, residential address, and country of residence;
- The date of the complaint and the date of the related incident;
- A description of the issue you are raising;
- Your player account number (if applicable);
- Any relevant documents or evidence (if applicable).

We may also request additional information or documentation to resolve your Complaint. Such requests will be reasonable in context and directly related to the issue raised. You are expected to provide the requested information or documents as soon as possible to avoid delays in the resolution process.

Acknowledgment & Response Timeline

- Within **1 week** of receiving your complaint, we will:

- Acknowledge receipt in writing;
- Explain how your complaint will be processed;
- Provide an estimated timeline for resolution.
- A final response will be issued **within 4 weeks** from the date of receipt. If the matter is complex and requires more time, the period may be extended **once by 4 additional weeks**. If an extension is needed, we will notify you in writing no later than the end of the third week from the original complaint receipt date (when feasible), explain the reasons for the delay and providing an updated resolution timeline.

You will receive a final written response, which will include either:

- Either a decision to **decline** the complaint with a reason, or
- A **final written resolution** with supporting details and evidence.

If the information or documents reasonably requested for the resolution of the complaint are not provided by you within the specified timeframe, the complaint may be rejected. In such cases, we will issue a response stating that the complaint has been closed due to insufficient information. If the six-month submission period has not yet expired, you may choose to submit a new complaint containing the necessary details.

4. Responsible Gaming Complaints

We recognize the critical importance of Responsible Gaming and are committed to protecting players who may be at risk of harm.

Responsible Gaming Complaints will be treated as high priority and are processed with accelerated timelines.

Upon receipt of a Responsible Gaming Complaint, we will:

- Acknowledge receipt in writing within two (2) calendar days;
- Explain how your complaint will be processed;
- Provide an estimated timeline for resolution.

We will use our best efforts to resolve Responsible Gaming Complaints within five (5) business days from the day of receipt.

If more time is reasonably needed to make a fair and informed decision, you will be notified of the delay in writing. In such cases:

- The delay may not exceed two (2) weeks from the original receipt date;
- If the delay is due to a lack of response or incomplete information from player, the resolution period may be extended once more by an additional two (2) weeks, at most;
- We will clearly inform you of the reason for the delay and the revised timeline.

5. Use of Artificial Intelligence (AI) in Complaint Handling

We may use Artificial Intelligence (AI) tools to support the initial handling and classification of Complaints, particularly for straightforward or routine matters. However, the use of AI is strictly limited to functions that ensure speed, consistency, and operational efficiency in non-complex cases.

Complaints that are identified as involving Responsible Gaming issues are never handled by AI. These cases are prioritized and managed directly by trained human personnel.

Likewise, Complaints that are assessed as complex in nature will be reviewed and resolved solely by qualified human staff.

All AI-generated responses and decisions are subject to monitoring and quality control. We regularly review AI outputs to ensure the Complaint handling is consistent, reasonable, and in line with our regulatory obligations and internal policies.

6. Alternative Dispute Resolution (ADR)

If you are unsatisfied with the outcome of your Complaint, you have the right to escalate your Complaint to an **independent ADR provider, free of charge**, as mandated by Article 5.3(6–7) LOK.

ADR is a mandatory procedure for us as a licensed operator, and we are fully responsible for covering all costs related to this process. You may escalate your Dispute to our ADR provider at no cost to you. Once the ADR process begins, the outcome issued by the ADR provider will be binding on us.

Please be advised that once the ADR process is initiated, you may not re-submit the same Dispute to another ADR entity. In addition, if you are voluntarily withdrawn from ADR procedure after it has started, the matter will be considered closed and cannot be reopened or escalated again through ADR.

During the ADR process, you are expected to cooperate in good faith and provide any additional information or clarification requested by the ADR provider in a timely manner.

7. Regulatory Oversight

While we are fully responsible for handling and resolving player Complaints in accordance with our licensing obligations, we acknowledge the supervisory role of the CGA

The **CGA** does **not** resolve individual player Complaints relating to gambling transactions on our platform. Complaints must first be processed internally through this Procedure and, if unresolved, through an independent ADR provider.

However, if you believe we have breached license conditions, acted unlawfully, or failed to meet our regulatory obligations, you may report the issue to the CGA via <https://portal.gamingcontrolcuracao.org/>.