

Cartwheel B.V.

COMPLAINT HANDLING PROCEDURE

V. 1.0 - JULY 2025

Revision History

Version#	Effective date	Approving official	Responsible officer	Next review date	Comments
1.0	January 24, 2025	Compliance function	Compliance function	July 23, 2026	

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1 Policy Overview

This Complaints Policy outlines Cartwheel B.V.'s framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient resolution process. It is designed in line with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Player Complaints Policy Guidelines version 1.1. of June 18th 2025, by the Curaçao Gaming Authority ("CGA").

The Company shall provide a Customer Support service equipped with adequate resources to promptly and effectively respond to Customers via phone and email.

2 Definitions

- **ADR:** Alternative dispute resolution ('ADR'), which is offered in accordance with the ADR policy as is to be issued by the CGA
- **Player Interaction:** Any written communication initiated by a player (e.g., queries, feedback) relating to the Cartwheel B.V.'s services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution.
- **Complaint:** A written expression of dissatisfaction relating to our services, decisions, or conduct, requiring a response or resolution. A complaint is considered formally submitted once a player has completed and provided the official Complaint Submission Form to us, and/or when the complaint has been escalated to an independent Alternative Dispute Resolution (ADR) service.
- **The Company:** Cartwheel B.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under number #165562
- **Customers:** Players who have opened an account on the Company's website and have been accepted as customers.
- **Dispute:** A complaint that remains unresolved after internal procedures and is escalated to an independent third party (ADR) or legal proceedings.
- **Registered player:** a Customer who has completed the registration process on the Company's platform or website, provided all required information, agreed to the terms and conditions, and whose account has been approved and activated.
- **Reportable Complaint:** when a Complaint Submission Form has been submitted by the Customer and/or a Complaint has been escalated to the ADR.

3 Complaint window

The Customer Support Team handles all Customer inquiries, ensuring prompt and high-quality responses.

Complaints can only be done by the Registered Player. A Registered Player is not allowed to sell, donate, rent out, lease, pawn or pledge, under any title, any of their (alleged) claims.

Players can submit complaints at any time up to six months of the incident or bet settlement. If the Complaint is initiated after this date, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.

4. Complaint submission

At first instance, Customer Complaints are handled by our customer support Team. Customers may contact the customer support team using the contact details made available on the website via email and/or live chat. If the first contact by the customer support team is not satisfactorily, the Customer can file an official Complaint Submission Form, which will include the following information and which will be available in English and the language of the URL that the Customer is using:

- A. Customer's name, address and place of residence;
- B. Customer's account number or name;
- C. Date of the complaint and date of the disputed event;
- D. Description of the conduct being disputed;
- E. Amount in dispute.
- F. URL

Upon receiving this Complaint Submission Form, the Complaint becomes a Reportable Complaint. Depending on the nature of the Reportable Complaint, the designated customer support team member shall respond to the Customer.

The Company will provide the customer support function through a system designed to manage the support tickets, complaints, feedback and suggestions submitted by Customers. Initially, all customer support will be done through email, helpdesk chats and/or communication via telephone.

The Customer will receive a final conclusion of their Reportable Complaint, which can entail:

- A final assessment of the outcome/resolution of the Reportable Complaint;
- Detailed reasons for not handling the Reportable Complaint.

In case the Customer is not satisfied with the resolution and makes a further Complaint to that effect, the Customer can escalate the matter to an independent ADR entity. Once the Customer informs the Company about the desire to escalate the matter to the ADR, the Company will provide the details of the ADR.

5. Timeframe Responsible Gaming Complaint

5.1 Responsible gambling complaints

Complaints related to responsible gaming are given the highest priority due to their potential impact on player well-being.

Cartwheel B.V makes every effort to resolve these cases within five business days.

Within two days of receiving a responsible gaming complaint, The Company will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be handled.
- Inform the player of the expected timeline for resolution.

If additional time is needed to make a fair and informed decision, the player will be notified of the delay, which may not exceed two weeks. Should the delay be caused by a lack of or slow response from the player, the resolution period may be extended by no more than an additional two weeks.

5.2 General complaints

Although the process is similar to responsible gaming complaints, the timeline is different.

The Company will assess and respond to all general complaints within four weeks.

If additional time is required due to the complexity of the issue or missing information, this period may be extended once by up to an additional four weeks. In such cases, the player will receive prior written notice explaining the reason for the extension.

Within one week of receiving a complaint, the operator will:

- Confirm receipt of the complaint in writing.
- Explain how the complaint will be handled.
- Provide information on the expected timeline for resolution.

6. Alternative Dispute Resolution (ADR)

In line with licensing requirements under the National Ordinance on Games of Chance (LOK), The Company provides independent Alternative Dispute Resolution (ADR) services to players.

If a complaint cannot be resolved internally, players may escalate it to an independent ADR provider free of charge. Once the ADR process is completed or if a player withdraws from it, the dispute is considered closed and cannot be reopened or pursued again.

The Company will be engaging an independent ADR entity in Curaçao, approved by the CGA.

The dispute resolution procedure at the ADR is free of charge, independent of the outcome. However, the Customer must first exhaust the Company's complaint procedure before the Customer can approach an ADR.

A decision of an ADR entity is binding on both the Company and the Customer who submitted the Reportable Complaint. The Customer can only bring Reportable Complaints to an ADR if:

- the value of the Reportable Complaint is more than EUR 2.000, - or
- if the Reportable Complaint pertains to a Responsible Gaming complaint.

More specific details of the ADR procedure will be provided as soon as the CGA has published their ADR policy.

The ADR procedure does not eliminate the possibility for Customers to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure.

7. Record-Keeping and reporting

The Company will maintain records of all complaints, including those resolved internally, escalated to Alternative Dispute Resolution (ADR), or referred to legal proceedings.

All complaint records will be kept securely and in accordance with applicable data protection laws. Records will be retained only for as long as necessary to fulfill legal and regulatory requirements, after which they will be securely deleted or anonymized.

The Company shall submit twice per year a report to the CGA detailing any Reportable Complaints and their outcomes, where known. Such reports will include:

- the total number of submitted Reportable Complaint;
- the total number of settled Complaints (whether upheld or rejected);
- the number of pending or unresolved Complaints;
- the number of Complaints per category (Responsible Gaming or other Complaints);
- the number of Complaints referred to the ADR;
- and the number and detail of Complaints for which the Customer has taken legal action.

8. Role of the CGA

The Curaçao Gaming Authority (CGA) does not intervene in or resolve individual player complaints. Instead, it oversees and monitors operators to ensure compliance with applicable regulations and licensing conditions.

Players retain the right to contact the CGA directly if they believe the operator has breached regulatory requirements, engaged in malpractice, or whistleblowing failed to uphold their obligations. While the CGA will not adjudicate individual disputes, information provided by players may support its supervisory and enforcement activities.