

Alternative Dispute Resolution Policy

Contents

I. Definitions	2
II. Complaint Handling and Escalation	2
III. Alternative Dispute Resolution	3

I. Definitions

1. **ADR Provider:** A CGA-certified third-party entity responsible for resolving disputes.
2. **CGA:** Curaçao Gaming Authority, the licensing and regulatory body.
3. **Complaint:** A formal expression of dissatisfaction from a player, managed under the internal complaints policy.
4. **Dispute:** An unresolved complaint that escalates to ADR.
5. **Micasino.com:** means the brand and all products offered 'Online' (accessed via a computer, mobile, or laptop) via www.micasino.com. Also, can be referred as the "Platform", "Us", "We", "Our".
6. **LOK:** "Landsverordening op de Kansspelen" is a Dutch term that translates to "National Ordinance on Games of Chance." This refers to a legal framework or national regulation designed to govern activities related to gambling or betting. In the context of Curaçao, this ordinance sets the rules and guidelines for the operation, supervision, and control of the gaming sector, aiming to ensure transparency, legality, and the protection of players within the jurisdiction.

II. Complaint Handling and Escalation

The management of Alternative Dispute Resolution (ADR) within LOK is a critical component of the Player Complaints Policy, ensuring that disputes are handled in a manner consistent with regulatory and operational standards. The process begins when a player submits a complaint, which must be recorded and addressed in accordance with established procedures.

The operator is obligated to investigate the matter, maintain transparent communication with the complainant, and deliver a final decision within the policy's prescribed timeframes.

Should the player remain dissatisfied with the resolution, the matter is formally classified as a dispute and the player is informed of the right to refer the case to the appointed ADR provider.

The ADR entity plays a vital role in safeguarding the integrity and fairness of the dispute resolution process. Its responsibilities include providing technical and procedural

expertise, ensuring independence and impartiality, and maintaining transparency in all proceedings.

Furthermore, the ADR provider is tasked with guaranteeing compliance with applicable legal and regulatory frameworks; however, the provider retains the discretion to refuse cases under specific circumstances, such as when the internal complaints process has not been exhausted, the dispute is deemed frivolous or vexatious, the matter is already under consideration by another ADR body or a court, or when the issue involves complex legal questions more suitably resolved through judicial processes.

In addition, disputes that fall outside the scope of contractual or transactional matters, particularly those involving gambling license breaches, are generally excluded, unless a related contractual aspect falls within the ADR's jurisdiction, in consultation with the CGA. The outcomes of the ADR process are binding on the operator, compelling immediate compliance with the decision rendered; nevertheless, the binding nature of such resolutions does not preclude the player's right to seek further recourse through the court system.

Comprehensive recordkeeping is an essential element of this process, with all complaints, disputes, ADR submissions, and corresponding documentation retained for the period mandated by the relevant regulatory authority.

This systematic approach ensures both procedural consistency and the protection of the rights of all parties involved.

III. Alternative Dispute Resolution

MiCasino.com, as a Curaçao licensed operator, recognizes its legal obligation under the Curaçao Gaming Authority's (CGA) regulatory framework to provide its customers with access to a certified Alternative Dispute Resolution (ADR) mechanism.

In compliance with these requirements, MiCasino.com adopts a structured ADR Complaints Process designed to ensure fairness, transparency, and efficiency in resolving disputes that remain unresolved after the completion of the internal complaints' procedure.

Initially, all player complaints are managed through the company's established internal process, wherein each case is logged, investigated, and addressed within reasonable timeframes. Should the player remain dissatisfied with the outcome, they are informed of their right to escalate the matter to ADR, including the provision of the ADR provider's contact information, procedural rules, and confirmation that the ADR decision will be binding on MiCasino.com, without prejudice to the player's right to pursue legal action in court.

For the purposes of fulfilling this regulatory requirement, MiCasino.com subscribes to the services of the Curaçao Alternative Dispute Resolution Entity (CADRE), a CGA-certified ADR provider, which offers licensed operators the ability to submit disputes either on an ad-hoc or subscription basis.

Engagement with the ADR process requires MiCasino.com to submit complete complaint documentation and supporting evidence within established timelines, to participate in mediation or adjudication as determined by the ADR provider, and to implement any decisions rendered within the prescribed period. In accordance with CGA policy, non-participation or failure to provide requested information may result in decisions being made in favor of the player and subsequent reporting to the CGA for potential regulatory enforcement.

Furthermore, MiCasino.com's Compliance Department is responsible for maintaining accurate records of all ADR cases, preparing quarterly reports to the CGA detailing dispute statistics, resolution times, and any systemic issues identified, and ensuring ongoing staff training on dispute resolution protocols.

By integrating CADRE's services into its complaint management framework, MiCasino.com not only ensures adherence to its licensing obligations but also upholds its commitment to fair, impartial, and transparent resolution of player disputes, thereby reinforcing consumer trust and regulatory compliance. For further details regarding CADRE's ADR services, licensed operators may contact operators@cadre.online.

APPROVED BY COMPLIANCE OFFICER.