

# Complaints Handling Policy

MCG Technologies N.V.

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## Version Control

| Version | Date         | Author             | Comments      |
|---------|--------------|--------------------|---------------|
| 1.0     | 12 June 2026 | Compliance Officer | First Version |

# 1. Purpose

This Complaints Handling Policy establishes a clear, fair, efficient, and transparent process for receiving, investigating, and resolving complaints from players, customers, or other stakeholders regarding Company's services, including online sports betting, casino games, account management, payments, responsible gambling tools, or any other aspect of our operations.

The policy ensures timely resolution, protects player rights, maintains trust, and complies with Article 5.3 of the LOK and the CGA Player Complaints Policy Guidelines v1.1 (18 June 2025). All players are entitled to a free and fair process, including access to Alternative Dispute Resolution (ADR) services provided by CGA-certified entities.

## 2. Scope

This policy applies to:

- All complaints received from players (existing or prospective), customers, employees, contractors, or third parties.
- All Company services (online platforms, mobile apps, customer support channels).
- All stages of the complaints process (receipt, acknowledgment, investigation, resolution, escalation).

Exclusions: Routine customer service queries (e.g., password reset, balance check) handled under normal support procedures.

## 3. Regulatory Context

This policy fully aligns with and implements:

- **Article 5.3** of the National Ordinance on Games of Chance (*Landsverordening op de kansspelen*, "LOK").
- **CGA Player Complaints Policy Guidelines Version 1.1** (18 June 2025) – mandatory under LOK.
- **CGA Alternative Dispute Resolution (ADR) Role and Certification Guidelines Version 1.0** (8 September 2025).
- CGA Online Portal User's Manual (updated January 2026) for incident/complaint reporting.

This policy forms part of the Company's Terms & Conditions and is accessible on the website.

## 4. Definitions

- **Complaint:** Any expression of dissatisfaction with Company's services, products, conduct, or decisions (e.g., delayed withdrawal, unfair game outcome, account issue, responsible gambling concern).
- **Complainant:** The person submitting the complaint.
- **Complaints Officer:** Designated person (or team) responsible for managing the process.
- **Resolution:** Outcome acceptable to the complainant or final decision by the Company.

## 5. Principles

- Complaints are handled fairly, impartially, promptly, confidentially, and without retaliation or disadvantage to the complainant.
- All complaints are acknowledged, tracked, and resolved in a transparent manner.
- Complainants receive clear, written explanations of findings and decisions.
- Escalation to the ADR is available if the internal process does not resolve the matter.
- Records are maintained for regulatory audit and continuous improvement.

## 6. Roles and Responsibilities

### 6.1 Customer Support Team

The Customer Support Team is responsible for managing all communication requests by customers and ensuring they are responded to as quickly as possible while maintaining a high-quality standard. The Company (as operator) is responsible overall for internal handling, record-keeping, ADR engagement, reporting to the CGA, and ensuring policy accessibility per CGA guidelines.

### 6.2 Complaints Officer / Compliance Department

- Acknowledge complaints within 2 business days.
- Investigate thoroughly and impartially.
- Provide written response within 15 business days (extendable to 30 days for complex cases or where information is required from third parties).
- Maintain secure records for at least 7 years (in line with AML and regulatory retention requirements).

The Complaints Officer operates independently from operational functions when handling escalated or complex complaints. All complaints handling decisions are documented and available for audit purposes.

## 6.3 Management

- Ensure resources and independence of complaints process.
- Review trends and implement improvements.

## 6.4 Third-Party Providers

- Report complaints affecting Company within 48 hours.
- Cooperate with investigations.

The Company monitors third-party compliance with complaints handling obligations. Any failure to report or cooperate is escalated and addressed promptly.

# 7. Complaints Handling Procedure

## 7.1 Submitting a Complaint

7.1.1 A complaint is defined as a written expression of dissatisfaction related to our services, terms, or decisions, submitted by a registered player expecting a resolution.

All complaints are formally registered upon receipt and assigned a unique reference number. Each complaint is categorised to support tracking, reporting and analysis.

7.1.2 Players may submit a complaint up to 6 months from the date of the incident or bet settlement (or conclusion for P2P/ante-post betting). However, in case of live betting, complaints must be submitted without delay as relevant data may be legally wiped or unavailable after a short period of time, making it difficult to investigate and/or substantiate the complaint.

7.1.3 How to submit:

- Email: [complaints@21.com](mailto:complaints@21.com)
- Live Chat: Available 24/7

7.1.4 Details to include:

- Full name, address and place of residence
- Account Number
- Date of Complaint and incident
- Description of the issue (using pre-determined category topics if applicable, but not mandatory)
- Supporting documents, if applicable.

### 7.1.5 Complaints Register

The Company maintains a central complaints register tracking:

- Date received
- Complaint category
- Assigned owner
- Status and deadlines
- Final outcome

## 7.2 Complaint Handling Process

### 7.2.1 Responsible Gaming Complaints (prioritised due to potential harm):

- Confirm receipt within 2 business days (in writing, with explanation of process and average timeline).
- Resolved within 5 business days when possible.
- Maximum delay: 2 additional weeks (with justification and notification).

All Responsible Gaming complaints are escalated to the Responsible Gaming Officer or Compliance function and handled as priority cases. All actions and decisions are documented.

### 7.2.2 Other Complaints

- Confirm receipt within 1 week (in writing, with explanation of process and average timeline).
- Resolved within 4 weeks when possible.
- If complex, one-time extension by an additional 4 weeks with prior written notice to the player.

### 7.2.3 Final Response

- A reasoned final assessment of the outcome/resolution with supporting evidence if necessary.
- Detailed reasons if the complaint is not handled (e.g., additional information reasonably requested within the initial period was not provided).
- If the player is unsatisfied, they are informed of their right to escalate to the Company's CGA-certified ADR provider.

### 7.2.4 Monitoring

The Company actively monitors all complaint timelines to ensure compliance with defined response periods. Any delays must be justified, documented, and communicated to the complainant.

### 7.3 Use of Artificial Intelligence (AI)

AI may be used for initial assessments, except in:

- Responsible Gaming cases
- Complex complaints
- AI records must be monitored to ensure solutions/recommendations are reasonable and consistent across players with like-for-like complaints.

Human oversight applies for all responsible gaming and complex cases.

## 8. Alternative Dispute Resolution

### 8.1 Availability of CGA-Certified ADR Provider

The Customer Support team shall ensure that all customers are informed of their right to escalate complaints to Curaçao Alternative Dispute Resolution Entity (CADRE) if their complaint remains unresolved. Details are available on the website and in customer service replies.

### 8.2 CADRE Engagement

The Company has a formal agreement with CADRE B.V. - a CGA-certified ADR provider. The entity is competent in adjudicating gaming complaints/disputes. The procedure is free of charge for the player (operator bears all costs), independent, and the outcome is binding on the operator.

### 8.3 Escalating to ADR

Players may initiate ADR if:

- They submitted a valid complaint via the operator's official form.
- The operator issued a final response or failed to resolve within the stated timelines.
- They remain dissatisfied.

To initiate: Contact the designated CGA-certified ADR provider and submit evidence / communication history plus the ADR form. See the form [here](#).

## 8.4 Operator Obligations

- Formal agreement with at least one CGA-certified ADR provider.
- Bear all costs of the ADR process.
- Once an ADR case begins, neither party may start the same case with another ADR entity.
- If the player abandons the ADR process, the issue is closed and cannot be refiled.
- Comply with ADR decisions and maintain transparent records.

All cases escalated to ADR are recorded and tracked. The Company ensures timely cooperation with ADR providers and full compliance with ADR decisions.

## 8.5 Possible ADR Outcomes

- Complaint upheld: compensation or corrective action.
- Complaint rejected: no breach found.
- Partial resolution: proposed compromise.

### Next Steps

If you accept the ADR decision:

The resolution will be treated as final for the purposes of the ADR process, and the Company will implement the outcome in accordance with the decision.

If you reject the ADR decision:

You are not bound by the outcome. The ADR process is an out-of-court dispute resolution mechanism and does not affect your right to pursue legal proceedings in a court of competent jurisdiction.

# 9. Record Keeping

The Company shall maintain a dated record of all interactions and complaints, as well as reasons for solutions or rejections.

## 9.1 Retention

Records shall be kept for at least five years from the last interaction (or per data protection/statute of limitations requirements). CGA may request access at any time.

## 9.2 Reporting

We report complaints data to the Curacao Gaming Authority via the CGA Online Portal twice yearly, summarising:

- Total number of complaints made.
- Total number of settled complaints (upheld and rejected).
- Number of pending or unresolved complaints.
- Number of complaints by category.
- Number referred to ADR.
- Number and detail of complaints for which a player has taken legal action.

All complaint records, including communications, investigations and outcomes are retained in a central system and are readily available for inspection by the CGA. Furthermore, complaint data and trends shall be reviewed by management on a periodic basis to identify systemic issues and implement corrective actions.

## 10. Contact Information

- Customer Support: [complaints@21.com](mailto:complaints@21.com)
- ADR Provider: Curaçao Alternative Dispute Resolution Entity (CADRE)
- CGA (for suspected regulatory breaches only, not individual disputes):  
[complaints@cga.cw](mailto:complaints@cga.cw) or via CGA website form.

## 11. Approval

This policy is effective immediately and will be reviewed annually or upon CGA updates.

This document ensures full compliance with current Curacao regulatory requirements as of March 2026. For the latest certified ADR list or guideline updates, refer to the official CGA website ([www.cga.cw](http://www.cga.cw) or [portal.gamingcontrolcuracao.org](http://portal.gamingcontrolcuracao.org)).