

Player Complaints Handling Procedure Gladiator Holding N.V.

Document Control

Version	Date	Description of Changes	Author
1.0	03.02.2026	Initial draft	IGA Trust B.V.

1. Purpose

This Complaints Policy ensures that all player complaints and disputes are addressed fairly, transparently, and in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK).

2. Objectives

This policy is part of our Terms & Conditions and outlines the procedures for filing, handling, and resolving complaints. All players are entitled to a free and fair process, including access to Alternative Dispute Resolution (ADR) services, where applicable.

3. Responsibilities

3.1. Customer Support Team

3.1.1. The Customer Support Team is responsible for managing all the communication requests by Customers and ensure that these are responded to as quickly as possible while maintaining a high-quality standard.

4. Procedure

4.1. Submitting a Complaint

4.1.1. 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.

4.1.2 Players may submit a complaint up to 6 months from the date of the incident or bet settlement.

4.1.3 How to submit:

- Email: info@b52.club
- Live Chat: Available 24/7

4.1.4 Details to be included in:

- Full name, address and the place of residence
- Account Number
- Date of Complaint and incident
- Description of the issue
- Supporting document, if applicable

4.2 Complaint Handling Process

4.2.1 Responsible Gaming Complaints

- Prioritized due to potential harm.
- Confirm receipt of the complaint within 2 business days. And we must provide an explanation of how the complaint will be processed and provide notice of the average timeline for the resolution of such complaints.
- Resolved within 5 business days when possible.
- Maximum delay: 2 additional weeks (with justification).

4.2.2 Other Complaints

- Confirm receipt of the complaint within 1 week. And we must provide an explanation of how the complaint will be processed and provide notice of the average timeline for the resolution of such complaints.
- Resolved within 4 weeks when possible.
- If complex, one-time extension by an additional 4 weeks with prior written notice to the player.

4.2.3 Final Response

- A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.

- Detailed reasons for not handling the complaint. If additional information is reasonably required to address the complaint fully, the operator must have requested this information within the initial four week time period. Should the complainant not provide the necessary information within that time period, the operator may reject the complaint.
- If the player is unsatisfied with the resolution and makes a further complaint to that effect, the player is informed that they may escalate the matter to Curaçao Alternative Dispute Resolution Entity.

5 Alternative Dispute Resolution

5.1 Availability of Curaçao Alternative Dispute Resolution Entity

5.1.1 The Customer Support (CS) team shall ensure that all customers are informed of their right to escalate complaints to Curaçao Alternative Dispute Resolution Entity, if their complaint remains unresolved. The procedure for escalation shall be made available through customer-facing communication channels, including the website and customer service replies.

5.2 Curaçao Alternative Dispute Resolution Entity Engagement

5.2.1 The Company will be engaging Curaçao Alternative Dispute Resolution Entity, an entity that provides ADR services in Curacao. The entity is competent in adjudicating any complaint and disputes in the gaming sector and provides adjudication services the outcome of which is binding.

5.2.2 Curaçao Alternative Dispute Resolution Entity is an independent alternative dispute resolution entity. The dispute resolution procedure at Curaçao Alternative Dispute Resolution Entity is free of charge, independent of the outcome. All licensed operators under the National Ordinance on Games of Chance (LOK) are legally required to provide ADR in accordance with the Curacao Gaming Authority's (CGA) guidelines.

5.3 Escalating to ADR

5.3.1 Players may initiate ADR if:

- They have submitted a valid complaint through the operator's complaints form.
- The operator has issued a final response or failed to resolve the complaint within the stated timelines (see Sections 4.1 & 4.2).
- They remain dissatisfied with the final outcome.

5.3.2 To initiate ADR, the player must:

- Contact the operator's designated ADR entity.
- Submit any evidence or communication history related to the complaint.
- Complete the ADR provider's application or complaint form.

5.4 Operator Obligations

5.4.1 We must have a formal agreement with at least one CGA-certified ADR provider and upload this to the CGA portal.

5.4.2 We bear all costs of the ADR process.

5.4.3 Once an ADR case begins, neither party may start the same case with another ADR entity.

5.4.4 If a player abandons the ADR process, the issue is considered closed and cannot be refiled later.

5.4.5 We must comply with ADR decisions and maintain transparent records of all cases referred to ADR.

5.5 Possible ADR Outcomes

- Complaint upheld: Player receives compensation or corrective action

- Complaint rejected: ADR finds no breach or wrongdoing by the operator.
- Partial resolution: The ADR proposes a compromise settlement.

6 Record Keeping

6.1 The Company shall maintain a dated record of all interactions and complaints, as well as reasons for solutions given or any complaints that have been ruled out. This record shall be kept for at least five years from the last interaction with the Customer.

6.2 Record-Keeping & Reporting

6.2.1 We report complaints data to the Curacao Gaming Authority:

- Twice yearly (by January 15 and June 15)
- The report will summarize the following:
 - 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.

7. Contact Information

- Customer Support: info@b52.club