

MIDDLE KANG B.V.

COMPLAINTS POLICY

Date: 31.07.2025

Regulatory Basis: Article 5.3, National Ordinance on Games of Chance (LOK)

Document Version: 1.0

1. Purpose

To provide a clear, consistent process for managing, resolving, and reporting player complaints in compliance with regulatory standards for Middle Kang B.V. operations.

2. Scope

Applies to all licensed operators and their employees responsible for handling player interactions, complaints, disputes, and regulatory reporting for Mk.com and Middle Kang B.V.

3. Definitions

“Player Interaction” Any written query or message from a player.

“Complaint” A written dissatisfaction requiring a response from Middle Kang B.V.

“Dispute” A complaint not resolved internally and escalated to ADR or legal action.

4. Responsibilities

Customer Support: First point of contact for all player complaints at Mk.com

Compliance Team: Ensures policy compliance, manages escalation, reporting for Middle Kang B.V.

ADR Provider: Handles unresolved complaints independently

5. Complaint Handling Procedure

5.1 Complaint Submission

- Accept only from the registered player on Mk.com
- Provide Complaint Submission Form available (online)
- Required fields: name, contact, account number, date, complaint details
- Accept complaints up to 6 months after incident/bet settlement or where practical to do so.

5.2 Acknowledgement

Send confirmation from Middle Kang B.V.:

- Within 2 business days for Responsible Gaming issues
- Within 5 business days for all others

Include process overview and estimated resolution timeline

5.3 Investigation & Resolution

5.3.1. Responsible Gaming Complaints:

- Immediate suspension of ALL functions on account
- For avoidance of any doubt, deposit and gameplay must be disabled immediately to avoid further harm to player
- Target resolution: 5 business days
- Max delay: 2 weeks (if justified)

5.3.2. Other Complaints:

- Target resolution: 4 weeks
- Extension: +4 weeks (with written notice if justified)

5.3.3. Final response from Middle Kang B.V. must be written and include:

- Decision and rationale
- Evidence (if applicable)
- Further steps or ADR referral (if unresolved)

6. Escalation to ADR

- Once dispute is resolved and provided to player, Support agent will inform players of ADR options in writing
- Once ADR begins, dispute cannot be re-opened by Support

7. Use of Artificial Intelligence (AI)

Not permitted for:

- Responsible Gaming complaints
- Complex complaints

Permitted for simple complaints with monitoring for consistency by Middle Kang B.V.

8. Role of the Curaçao Gaming Authority (CGA)

CGA does not resolve individual complaints against Middle Kang B.V.

Players may contact CGA for issues like:

- Breach of license
- Malpractice or regulatory violations

CGA may request access to Middle Kang B.V. complaint records at any time.

9. Record-Keeping & Reporting

Middle Kang B.V. reports due January 15th and June 15th each year

Report will include:

- Total complaints received by Middle Kang B.V.
- Outcomes (resolved, rejected, ADR, legal)
- Complaint categories

Retain records for 5 years or per Curaçao law

10. Terms & Conditions Integration

- Publish complaint procedure visibly on Mk.com

Include on website:

- Complaint process and form links
- Middle Kang B.V. contact info
- ADR details:
- CGA disclaimer and contact information

11. Valid Complaint Categories

1. Deposit/Withdrawal issues
2. Bonus terms
3. Account closures/restrictions
4. Game fairness
5. Responsible Gaming matters
6. KYC/Verification
7. Fraud
8. Technical issues
9. AML violations
10. Underage gambling
11. Licensing and regulatory concerns