



SGD TECH N.V.

CompanyRegistrationNo.:169025

Player Complaints Policy

Company: SGD TECH N.V.

Registered Address: Trias Building, Hanchi Snoa 19, Willemstad, Curaçao

Platform: <https://kickwin.io>

Version	Description	Effective Date	Approved By	Review Date
1	Initial Player Complaints Policy	02/02/2026	Board of Directors	02/02/2026

This Policy is established in accordance with, and shall be interpreted in line with:
National Ordinance for Games of Chance (LOK, PB 2024 no. 157);
Requirements and guidance issued by the Curaçao Gaming Authority (CGA);

Approved by (Board of Directors):

Name:

Title: Director

Signature: 

Date: 25-02-2026

Reviewed by (Compliance Officer):

Name: Ms. Eliane Solis Vazquez

Title: Compliance Officer

Signature: _____

Date: _____



Trias Building, Hanchi Snoa 19, Willemstad Curaçao



compliance@kickwin.io

1. Policy Statement

SGD TECH N.V. is committed to handling player complaints in a fair, transparent, timely, and effective manner.

The Company recognizes the importance of an accessible and impartial complaints handling process to protect players, resolve disputes, and maintain trust in its gaming operations. This Player Complaints Policy sets out the principles and framework governing the receipt, handling, escalation, and resolution of player complaints in accordance with applicable Curaçao laws and regulatory requirements.

2. Purpose

The purpose of this Policy is to:

- Provide players with a clear and accessible mechanism to submit complaints;
- Ensure complaints are handled consistently, objectively, and without undue delay;
- Promote fair outcomes and effective dispute resolution;
- Comply with applicable legal and regulatory obligations under Curaçao law;
- Facilitate escalation to independent dispute resolution where internal resolution is not possible.

3. Legal and Regulatory Framework

This Policy is established in accordance with, and shall be interpreted in line with:

- National Ordinance for Games of Chance (LOK, PB 2024 no. 157);
- Requirements and guidance issued by the Curaçao Gaming Authority (CGA);
- Applicable consumer protection and dispute resolution standards.

4. Scope and Applicability

This Policy applies to:

- All players using the Company's gaming platform <https://kickwin.io>;
- All complaints relating to gaming services, transactions, account management, promotions, or customer support;
- All employees, contractors, and third parties involved in the handling or escalation of player complaints.

5. Definition of a Complaint

A complaint is any expression of dissatisfaction by a player relating to the Company's gaming services or conduct, where a response or resolution is explicitly or implicitly expected.

6. Internal Complaints Handling Process

6.1 Submission of Complaints

Players may submit complaints through the Company's designated customer support channels, including electronic communication.

Complaints should include sufficient details to allow proper assessment, such as account information, transaction details, and a description of the issue.

6.2 Acknowledgement and Review

The Company shall:

- Acknowledge receipt of a complaint within a reasonable timeframe;
- Review the complaint impartially and objectively;
- Request additional information where necessary to assess the matter.

6.3 Resolution and Communication

The Company shall make reasonable efforts to resolve complaints fairly and without undue delay.

Players shall be informed of the outcome of the complaint and the reasons for the decision in a clear and understandable manner.

7. Escalation and Alternative Dispute Resolution (ADR)

Where a player's complaint cannot be resolved through the Company's internal complaints handling process, or where the player is dissatisfied with the outcome, the player may escalate the complaint to an independent Alternative Dispute Resolution (ADR) provider.

SDG TECH N.V. has appointed CADRE as its independent ADR provider for the handling of eligible player disputes, in accordance with applicable regulatory requirements.

CADRE operates independently from SDG TECH N.V. and is responsible for the impartial assessment and adjudication of disputes submitted to it. The ADR process is separate from the Company's internal complaints handling and ensures fairness and transparency for both the player and the Company.

Players may submit complaints to the ADR provider only after the Company's internal complaints procedure has been completed, unless otherwise required by applicable regulations.

8. Independence and Fairness

Complaints shall be handled:

- Without discrimination or bias;
- Independently from commercial or operational interests;
- In a manner that ensures fairness to both the player and the Company.

9. Record Keeping

The Company shall maintain records of player complaints, including:

- Complaint details and correspondence;
- Internal assessments and decisions;
- Outcomes and any remedial actions taken.

Records shall be retained in accordance with applicable record-keeping requirements.

10. Interaction with Responsible Gaming and AML Measures

Information obtained through the complaints process may, where relevant, be used to support:

- Responsible gaming assessments;
- AML/CTF monitoring and escalation;

Subject to applicable confidentiality and data protection requirements.

11. Governance and Oversight

Senior Management is responsible for ensuring the effective implementation of this Player Complaints Policy.

The Board of Directors retains ultimate responsibility for complaints handling governance and formally approves this Policy and any material amendments.

12. Review and Update of the Policy

This Policy shall be reviewed at least annually, or sooner where required by changes in law, regulation, or the Company's business operations.



SGD TECH N.V.

CompanyRegistrationNo.:169025

13. Contact Information

For questions or concerns relating to information security, please contact:

Customer Support / Complaints Handling

SDG TECH N.V.

Trias Building, Hanchi Snoa 19

Willemstad, Curaçao

Attention: Customer Support / Complaints Handling

Email: compliance@ecorpp.com

Escalation to Alternative Dispute Resolution (ADR)

Where a complaint cannot be resolved through the Company's internal complaints handling process, or where the player is dissatisfied with the outcome, the player may escalate the complaint to the Company's appointed independent Alternative Dispute Resolution (ADR) provider.

ADR Provider: **CADRE**

(Independent Alternative Dispute Resolution Provider)

Players may submit complaints to the ADR provider only after the Company's internal complaints procedure has been completed, unless otherwise required by applicable regulations.



Trias Building, Hanchi Snoa 19, Willemstad Curaçao



compliance@kickwin.io



SGD TECH N.V.

CompanyRegistrationNo.:169025

BOARD RESOLUTION

Approval of Player Complaints Policy

SDG TECH N.V.

(Incorporated in Curaçao)

Registered Address: Trias Building, Hanchi Snoa 19, Willemstad, Curaçao

RESOLUTION OF THE BOARD OF DIRECTORS

The undersigned, being the members of the Board of Directors of SGD TECH N.V. (the "Company"), hereby adopt the following resolutions:

1. Approval of Player Complaints Policy

RESOLVED THAT the Board of Directors has formally reviewed and approved the Company's Player Complaints Policy, which establishes the principles and framework for the fair, transparent, and timely handling of player complaints and disputes.

The Player Complaints Policy is adopted in accordance with applicable Curaçao laws and regulatory requirements, including:

- National Ordinance for Games of Chance (LOK, PB 2024 no. 157);
- Applicable requirements and guidance issued by the Curaçao Gaming Authority (CGA).

2. Internal Complaints Handling and ADR

RESOLVED THAT the Company shall maintain an effective internal complaints handling process as the primary mechanism for resolving player complaints.

RESOLVED FURTHER THAT, where a complaint cannot be resolved internally or where a player remains dissatisfied with the outcome, the complaint may be escalated to an independent Alternative Dispute Resolution (ADR) provider.

RESOLVED FURTHER THAT the Board acknowledges the appointment of CADRE as the Company's independent ADR provider for the handling of eligible player disputes, in accordance with applicable regulatory requirements.



Trias Building, Hanchi Snoa 19, Willemstad Curaçao



compliance@kickwin.io

3. Implementation and Oversight

RESOLVED THAT Senior Management is hereby instructed to ensure the effective implementation of the Player Complaints Policy across all relevant operations and player-facing functions.

RESOLVED FURTHER THAT appropriate controls shall be maintained to ensure complaints are handled impartially, documented appropriately, and escalated where required.

4. Ultimate Responsibility

RESOLVED THAT the Board of Directors retains ultimate responsibility for complaints handling governance and oversight and shall review the Player Complaints Policy at least annually or upon material changes to applicable laws, regulatory requirements, or the Company's business operations.

5. Effective Date

RESOLVED THAT this Resolution shall take effect as of [DD / MM / YYYY]. 25-02-2026

By order of the Board of Directors

Name: _____

Title: Director

For and on behalf of SGD TECH N.V.