

ABC INTERACTIVE

Complaints Policy

1. Purpose

ABC Interactive is committed to handling player complaints fairly, consistently, and within defined timeframes. This Policy sets out the standards ABC Interactive holds itself to when a player raises a complaint, the internal framework within which complaints are managed, and the obligations that apply to all staff involved in the process.

2. Legal Basis

This policy is issued in compliance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, 'LOK') and the Player Complaints Policy Guidelines issued by the Curacao Gaming Authority (CGA).

3. Scope

This Policy applies to:

- All staff involved in receiving, investigating, or resolving player complaints, regardless of function.
- All complaints received from registered players on ABC Interactive platform
- All complaint types, including those relating to responsible gaming, KYC, withdrawals, game outcomes, and any other aspect of the player relationship.

This Policy does not apply to general player enquiries or feedback that do not express dissatisfaction requiring resolution. Those are handled under standard customer service procedures.

4. Definitions

Term	Meaning for this Policy	Note
Player Interaction	Any written contact from a player to customer service — enquiries, feedback, requests for help.	No complaint action required unless dissatisfaction is identified.
Complaint	A written expression of dissatisfaction where the player expects a response or resolution. For reporting purposes, a complaint is formally recorded when the Complaint Submission Form is submitted or the matter is escalated to ADR.	Triage required on receipt based on complaint category.
Dispute	A complaint that has not been resolved internally and has been escalated, either within the company or to an ADR provider or court.	ADR and legal obligations attach from this point.

Term	Meaning for this Policy	Note
Responsible Gaming Complaint	Any complaint relating to self-exclusion, cooling-off implementation, or a vulnerable player.	Priority handling; AI restrictions apply.

5. Policy Commitments

ABC Interactive commits to the following standards in complaint handling:

Commitment	What this means in practice
Accessibility	Players can submit complaints free of charge at any time, using email, live chat, or the official Complaint Submission Form.
Fairness	Every complaint receives an individual assessment on its own merits. No player is disadvantaged for having raised a complaint.
Transparency	Players are informed of how their complaint will be handled, the expected timeline, and the outcome in writing. Where resolution is delayed, the player is notified in advance.
Timeliness	Complaints are acknowledged and resolved within the timeframes set out in Section 7.3.3. Responsible gaming complaints are prioritised.
Finality	Every complaint receives a written final determination. If the player remains unsatisfied, they are informed of their right to escalate to an independent ADR provider.
Non-restriction	ABC Interactive does not restrict a player's right to seek independent legal recourse or to contact the CGA directly regarding potential regulatory breaches or malpractice.
Confidentiality	Complaint records are handled in accordance with ABC Interactive's data protection obligations and retained for the required periods.

6. Responsibilities

- The Customer Support team (CS) is responsible for managing all the communication requests by Customers and ensuring that these are responded to as quickly as possible while maintaining a high-quality standard.
- The Complaints team (CT) is responsible for handling escalated complaints and responding to disputes from the ADR.

7. Complaints and Disputes Process

7.1 Who May Submit a Complaint

Only the registered player may submit a complaint. Third-party submission is not permitted. Under Article 1.3(c) of the LOK, players may not assign, transfer, pledge, or otherwise deal with their claims against the operator.

7.2 Complaint Window

Complaints may be submitted free of charge within six months of the relevant event or bet settlement. The window commencement depends on the complaint type.

Complaint Type	Complaint Window (6 months)
Standard gaming / casino	Up to six months of the settlement of the bet or the incident about which they are making a complaint
P2P gaming (e.g. poker) or ante post betting	Up to six months after the bet settlement or conclusion of a specific event rather than the placement of the wager.
In-running sports betting	Within six months. Players are advised that prompt submission is recommended - event-specific data may not be retained indefinitely and may affect investigation.

7.3 Complaint Process

A complaint will follow the following process:

7.3.1 Initial receipt

- Players may contact our CS team by email and/or live chat.
- The player must complete the **Complaint Submission Form** with the following information:
 - Name, address, and place of residence
 - Date of the complaint / date of the disputed event.
 - Description of the conduct being disputed

Supporting documentation may be requested where it is reasonable and proportionate to the nature of the complaint. Any such request must be made within the applicable resolution period.

7.3.2 Categorisation

On receipt, the Complaints team (CT) is responsible for assessing and categorising the complaint before any substantive response is issued.

The categorisation determines the handling track and applicable timeline.

Category	Criteria and Handling Track
Responsible Gaming - Priority Track	Applies where the complaint relates to: self-exclusion availability and/ or timely implementation; cooling-off availability or implementation; or cases related to players identified as vulnerable. These complaints are escalated to the Compliance team immediately and handled exclusively by human staff. AI tools are prohibited.
Standard Track	Applies to all other complaint types. Handled by the Complaints team (CT).

7.3.3 Acknowledgement and Resolution Timeframes

The following timeframes are mandatory.

Milestone	Responsible Gaming — Priority	Standard Track
Acknowledgement	Within 2 business days of receipt	Within 1 week of receipt
Target Resolution	5 business days (best efforts)	4 weeks
Maximum Extension	Up to 2 weeks with prior written notice to the player. A further 2-week extension is permitted where delay is caused solely by the player failing to provide requested information.	One further 4-week extension. Prior written notice to the player is required before the extension is taken.

7.3.4 Complaint Response and Resolution

Every player who submits a complaint will receive a written final determination. ABC Interactive will not close a complaint without issuing a written response, regardless of outcome.

The written response will take one of the following forms:

- **Final assessment of outcome.** A reasoned determination of the complaint outcome, setting out whether the complaint is **upheld, partially upheld, or rejected, or resolved by way of settlement**, with supporting evidence where necessary or applicable.
- **Rejection for insufficient information.** Where additional information is reasonably required to address the complaint and the Complaints team has requested this within the

initial four-week period, ABC Interactive may **reject** the complaint if the **player fails to provide the necessary information within that timeframe**. Detailed reasons for the rejection will be provided in writing.

- **Referral to ADR.** Where the **player remains dissatisfied** with the outcome, ABC Interactive will inform the player in writing that they may escalate the matter to an independent ADR provider, and provide the relevant contact details.

7.4 Alternative Dispute Resolution (ADR)

7.4.1 When ADR Applies

A player is entitled to refer a complaint to the ADR provider, free of charge, when the internal complaint process has been exhausted, and when a final determination has been issued and the player remains dissatisfied with the outcome.

7.4.2 ADR Rules

The following rules govern the ADR process:

- Once an ADR process has been completed, neither the player nor the operator may recommence the process with a different ADR entity in relation to the same complaint.
- If the player voluntarily withdraws from an ADR process after it has commenced, the right to resurface that dispute is extinguished.
- Low monetary value does not automatically justify refusing ADR where the subject matter is serious. A complaint involving the admission of a self-excluded player must be treated as a priority matter regardless of the amounts involved.
- ABC Interactive reserves the right to set ADR parameters to protect its legitimate interests and prevent abuse of the ADR process. Such parameters may include: a requirement that ADR be completed before a player may initiate legal proceedings; conditions on the binding nature of the ADR outcome on the player; or a minimum claim value required for escalation to ADR

7.5 Player Access to Legal Recourse

Nothing in this Policy restricts a player's right to pursue independent legal action. Players also retain the right to contact the CGA directly at any time in respect of alleged regulatory breaches, or malpractice. These rights are not conditional on completion of the ADR process unless specific parameters have been agreed and communicated in the Terms and Conditions.

8. Record Keeping and Regulatory Reporting

8.1 CGA Regulatory Reporting

ABC Interactive will submit complaint reports to the CGA on 15 January and 15 June each year. Reports are based on complaints submitted by players using the Complaint Submission Form since the previous reporting period.

Each report will summarise the following:

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

8.2 Record Retention

ABC Interactive maintains a dated record of all player interactions, complaints, and their outcomes, including the reasoning behind any resolution or rejection. Records of unresolved complaints and complaints escalated to ADR or legal proceedings are retained for the lesser of five years or the period required by applicable data protection law, statute of limitations, or other relevant legislation. All complaint records are held in our ticketing and back office systems.

9. Terms and Conditions

The General Terms and Conditions will include the Complaints and Disputes Procedure, including:

- An overview of how a complaint may be raised, including available channels to contact Customer Support and the Complaint Submission Form
- Overview of how we will handle the complaint
- A stipulation when the outcome will be communicated based on the complaint category
- Information on the player's rights to raise a dispute to the ADR, with the relevant links and contact details.

Required Element	Content Requirement
Customer service contact	How and where to contact ABC Interactive; links to email and live chat.
Complaint submission details	Information required to make a complaint; links to the online submission form and/or downloadable form.

Acknowledgement and resolution timelines	The applicable timelines for acknowledgement and resolution, by complaint category.
Player rights	Explicit right to access ADR services free of charge; right to contact the CGA regarding regulatory matters; right to legal recourse.
ADR process and provider	Full details of the ADR process; contact information for the ADR provider.
CGA role	A clear statement that the CGA does not mediate in individual disputes, but may be contacted directly by the player in cases of alleged regulatory breach or malpractice.