

LUDERE B.V.

Complaints Policy

This document outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”).

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Introduction

LUDERE B.V. values its reputation and is committed to maintaining a high level of ethical standards in the conduct of its business.

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”).

The Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

- LUDERE B.V.’s player complaints policy will be clearly included or referenced in the website(s)’s Terms and Conditions. It must include details of all Stages of Complaint Resolution.
- LUDERE B.V. may, at its own discretion and subject to compliance with applicable private law, require the player to explicitly confirm acceptance of the Complaints policy in any way including a tick box, popup or email.
- LUDERE B.V. may, at its own discretion, include acceptance of the Complaints policy as part of its registration process.

This Complaints Policy is based on regulatory requirements under the LOK. It does not affect or override the applicable rules of private law, including, but not limited to, the provisions of Book 6 of the Civil Code of Curaçao concerning general terms and conditions. LUDERE B.V. remains responsible for ensuring compliance with all relevant civil law obligations independently of this policy. LUDERE B.V. seeks appropriate legal advice to ensure that the complaints procedures and terms and conditions conform to private law requirements.

Definitions

Player Interaction

Any written communication initiated by a player and directed to LUDERE B.V.’s customer service team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

Complaint

A Complaint is a written expression of dissatisfaction by a player relating to LUDERE B.V.’s services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution.

For the purpose of Reporting requirements a complaint is when a Complaint Submission Form has been submitted by the player to LUDERE B.V. and/or a complaint has been escalated to ADR.

Dispute

A complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organisation or to an independent third party (e.g. an ADR provider or court of law).

Complaint Submission Process

Complaint Window

1. This Complaints Policy applies to all players of LUDERE B.V. as licensed under the LOK from the date of licence issuance, and under the NOOGH regime from the moment LUDERE B.V. were issued a green or orange dynamic seal.
2. Players may lodge a complaint free of charge at any time up to six months after the settlement of the bet or the incident about which they are making a complaint.

Stages/Escalation of Complaint Resolution

1. Complaints can only be made by the registered player. Article 1.3 section c of the LOK mandates that a player is not allowed to sell, donate, rent out, lease, pawn, or pledge, under any title, any of their claims against the holder of a gaming license from the CGA.
2. In the first instance the operator must offer customer support via email and/or live chat.
3. An official Complaint Submission Form must be available to the player.
 - a. This form must be either a downloadable form that can be completed and emailed or otherwise uploaded by the player, and/or a form that is fully completed and submitted online.
 - b. The form must include at a minimum the following sections:
 - i. Complainant's name, address, and place of residence.
 - ii. Complainant's account number (if applicable).
 - iii. Date of the complaint and date of the disputed event.
 - iv. Description of the conduct being disputed (using a selection of pre-determined category topics if/as applicable).
 - c. The form must be available in English and in the language of the website/domain that the player is using.
 - d. The operator may request supporting documentation the player requires to include as part of the complaint. Any additional information or documentation requested by the operator must be reasonable in the context of complaint resolution.

4. LUDERE B.V. offers an ADR option for the players.
5. Except if mutually agreed under specific terms of ADR, LUDERE B.V. does not restrict the rights of the player him/herself to take legal action.

Role of the CGA

1. LUDERE B.V. makes the role of the CGA clear to the player in the Terms and Conditions.
2. The CGA will not resolve or make decisions on any player complaints regarding gambling-related transactions on LUDERE B.V.'s website(s).
3. Unless deemed to be inadequately handled, the decisions made by LUDERE B.V. and/or ADR provider will not be subject to reviewing and/or overturning by the CGA.
4. Notwithstanding 2. and 3. above LUDERE B.V. will not restrict the player's ability to contact the CGA directly with regard to matters including but not limited to malpractice, breach of license conditions or whistleblowing.
5. LUDERE B.V. accepts that while the CGA does not mediate in individual disputes it will use the information to support its supervisory and enforcement actions.

Complaint Resolution Process

Timeline: Responsible Gaming Complaints

Complaints related to responsible gaming should be prioritized due to potential impacts on player well-being. Complaints should be categorized as related to responsible gaming in any case when it regards targeting of Vulnerable Players, the availability and/or timely implementation of self-exclusion and/or cooling-off and the mandated consequences therein as outlined in the Responsible Gaming Policy. LUDERE B.V. will use best efforts to resolve these cases within five business days.

Within two days of receiving a complaint, LUDERE B.V. will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

If more time is needed by LUDERE B.V. to make a reasonable and informed decision, players will be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.

Timeline: All Other Complaint Types

LUDERE B.V. will assess and respond to complaints within four weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional four weeks, with prior written notice to the player.

Within one week of receiving a complaint, LUDERE B.V. will:

- Confirm receipt of the complaint in writing.
- Provide an explanation of how the complaint will be processed.
- Provide notice of the average timeline for resolution of such complaints.

Response and Resolution

A player will always receive a final determination of their complaint in writing.

The response will be either:

1. A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
2. 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, LUDERE B.V. may reject the complaint.
3. 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 an independent ADR entity.

Artificial Intelligence (AI)

The use of AI is permissible under this Complaints Policy Guideline subject to the following Terms:

1. Once a player complaint has been identified as pertaining to Responsible Gaming, communications with the player should be conducted by a human, not AI.
2. Complaints that can be reasonably considered as complex should be dealt with by a human, not AI.
3. The AI records must be monitored to ensure that they are reasonable in their solutions/recommendations and consistent across players with like-for-like complaints.

Alternative Dispute Resolution

In order to be compliant with the license conditions as mandated by LOK, LUDERE B.V. offers independent ADR services to their players in accordance with the ADR Policy.

1. Full details of the ADR process is included in LUDERE B.V.'s Terms and Conditions.
2. If a complaint cannot be resolved internally, players are entitled to escalate the matter to an independent ADR provider, free of charge. LUDERE B.V. will bear all costs of the ADR process.
3. Once the ADR process is completed it cannot be recommenced by either the player or LUDERE B.V. with another different ADR entity.
4. In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future.
5. Provision of ADR services by LUDERE B.V. is mandatory. If LUDERE B.V. sets ADR parameters in order to prevent abuse (such as whether ADR must be undertaken before a player can initiate

legal proceedings, the binding nature of the ADR outcome on the player, or whether there is a minimum claim value required for escalation to ADR), LUDERE B.V. will carefully consider these conditions and seek independent legal advice regarding any applicable civil legislation.

Each case is assessed on its own merits. For instance, if a claim concerns the admission of a self-excluded person, LUDERE B.V. takes the matter seriously, regardless of the monetary value involved.

Record-Keeping and Reporting

LUDERE B.V. will ensure that:

1. Reports are submitted to the CGA on January 15th and June 15th based on complaints submitted to the operator since the previous reporting period by players using the Complaints Submission Form.
2. The reports will summarise the following:
 - a. Total number of complaints made.
 - b. Total number of settled complaints (upheld and rejected).
 - c. Number of pending or unresolved complaints.
 - d. Number of complaints by category.
 - e. Number referred to ADR.
 - f. Number and detail of complaints for which a player has taken legal action.
3. Transparency and compliance with ADR decisions and regulatory updates.
4. ADR service providers will have their own reporting requirements in accordance with the Alternative Dispute Resolution policy issued by the CGA.
5. Records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five years or the relevant time stipulated by data protection, statute of limitations or other relevant laws or guidelines.
6. The CGA reserves the right to request, at any time, access to records of complaints received as well as any disputes that are pending resolution.

Terms and Conditions

The Complaints procedure statement is visible and accessible on LUDERE B.V.'s website as a standalone link. The Complaints procedure will also be clearly outlined in the Terms and Conditions.

Information provided will include at a minimum:

1. Links to customer service and information on how to contact LUDERE B.V..
2. Detail of information required for a player to make a complaint and links to either/both either the online form or the downloadable PDF/Word document.
3. Timelines for responses and resolution.
4. Player rights to complain including explicit rights to ADR services and regulatory escalation.

5. An explanation of the potential consequences of the relevant ADR entity's decision, and the manner in which this will affect the player's right to further legal and judicial recourse.
6. Details of the ADR process and player rights.
7. Contact information for the ADR provider(s).
8. Clear information that the CGA does not mediate in individual disputes, but if the player feels LUDERE B.V. is in breach of regulations that the player may contact the CGA.

Reasons for Complaint

The player has the right to make a complaint regarding any part of their relationship with LUDERE B.V., or any incident related to their participation in a game of chance. This includes (but is not limited to):

1. Deposit issues
2. Withdrawal issues
3. Bonus terms and conditions
4. Account closures or restrictions
5. Alleged errors or unfairness in game outcomes
6. Responsible gaming issues
7. Treatment of player balances
8. KYC and Verification
9. Data Protection
10. Technical or Software issues
11. AML concerns
12. Issues with minors
13. Fraudulent games
14. Fraudulent practices
15. License or regulation
16. Unfair terms and conditions

Policy/Procedures Review

This policy shall be reviewed and adjusted from time to time in accordance with best practice guidelines or regulatory requirements for LUDERE B.V.