

## **Player Complaint Policy**

**CARRER N.V.**

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## Document Information

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| <b>Subject</b>        | Player Complaint Policy                                  |
| <b>Purpose</b>        | Company procedures for Player Complaint resolution tasks |
| <b>Involvements</b>   | All departments                                          |
| <b>Responsibility</b> | Complaint department                                     |
| <b>Approval</b>       | Director                                                 |
| <b>Review</b>         | Annually or earlier as needed                            |
| <b>Classification</b> | Company Confidential                                     |
| <b>Version</b>        | 1.0                                                      |
| <b>Updated By</b>     | Complaint department                                     |
| <b>Authorised By</b>  | Director                                                 |

## 1. Introduction

This Player Complaint Policy (hereinafter "Policy") is drafted in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curaçao Gaming Authority (CGA) regulations. The purpose of this Policy is to ensure that any player complaint relating to the Company's gaming services is handled in a consistent, transparent, and efficient manner.

## 2. Scope of the Policy

This Policy applies to any complaint submitted by a player in relation to the Company's gaming operations. Players retain the right to refer a dispute directly to an Alternative Dispute Resolution (ADR) provider at any time under LOK Article 5.3; however, the Company encourages the player to use this internal complaint process first to expedite resolution.

This Policy does not limit or prejudice a player's statutory rights. If any dispute remains unresolved to the player's satisfaction, the player may choose to pursue alternative dispute resolution or seek legal remedies in court at any point.

## 3. Complaint Submission

### 3.1. General Inquiries and Formal LOK Complaints

The Company acknowledges that players may raise various questions, problems, or concerns ("general inquiries") through Customer Support. These are often resolved quickly and do not necessarily constitute a formal complaint under Article 5.3 of the LOK.

However, if the matter remains unresolved or a player explicitly wishes to lodge an official complaint (hereafter, "Complaint" with a capital 'C'), the LOK Timelines and Notifications outlined below applies.

### **3.2. Official Complaint Form (Template)**

In accordance with Article 5.3(3) of the LOK, a formal Complaint must follow the template ("Complaint Form") provided by the Company. The template requires:

- Name, address, and place of residence of the complainant,
- Date of the Complaint,
- One of the official languages: English, Dutch, or Papiamentu,
- Description of the conduct or incident being complained about.

The Company makes the Complaint Form available (...by e.g. email request, or a downloadable PDF on our website, etc.). It must be completed and submitted within six (6) months of the incident leading to the Complaint, in line with Article 5.3(1) LOK.

No filing fees or charges apply for submitting a Complaint.

### **3.3. Filing Channels**

Players can submit the completed Complaint Form via:  
Email: [complaints@carrernv.com](mailto:complaints@carrernv.com)

Complaints that do not meet the requirements (e.g., not using the official template or lacking required details) may be handled as general inquiries until the player provides the missing information.

## **4. Complaint and General Inquiries Resolution Process**

Although the LOK's timelines below take effect from the moment the Company receives a valid Complaint Form, the Company follows a multi-step internal approach for any complaints (both Complaint and general inquiries). A player can escalate directly to ADR or other legal channels at any time as per Article 5.3 LOK.

### **4.1. Multi-Stage Internal Procedure**

#### **Stage 1 – Frontline Support**

A Support Host in Customer Support investigates and attempts to resolve the complaint. If the player is dissatisfied with the initial resolution, or if the Support Host cannot conclude the matter promptly, the complaint is escalated to Stage 2.

#### **Stage 2 – Team Leader Review**

A Team Leader (or equivalent supervisor) reviews the complaint in more detail. Additional internal checks or departmental consultations may be carried out. The Team Leader communicates a proposed resolution to the player. If the player remains dissatisfied, the complaint proceeds to Stage 3.

#### **Stage 3 – Complaints Team**

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The complaint is forwarded to the dedicated complaints Team, which undertakes a final internal review.

The Complaints Team's written conclusion is considered the last internal step.

Upon providing this decision, the Company's internal complaint process is deemed complete. Any further dissatisfaction can be addressed via ADR or other legal remedies.

## **4.2. LOK Timelines and Notifications**

**Responsible Gaming Complaints:** Complaints related to responsible gaming are prioritized due to potential impacts on player well-being. The Company will use best efforts to resolve these cases within five (5) business days. If more time is needed, players will be informed of the delay, and such delay will not exceed two (2) weeks.

**General Complaints (LOK Timelines):** For all other formal Complaints, the following timelines apply:

within one (1) week of receiving a valid Complaint Form, the Company issues a written acknowledgment to the complainant, confirming receipt and detailing any next steps or if further documentation is required;

the Company provides a final written response (resolving or refusing the Complaint) within four (4) weeks of receiving the Complaint. If the Complaint does not meet the LOK requirements, or if the Company decides not to process it, the reason for non-processing is given within the same four-week period;

if the Company needs more than four (4) weeks (e.g., complex investigation), it may invoke one (1) extension of up to an additional four (4) weeks. The complainant must be informed in writing before the initial four-week deadline expires, stating the reason for the delay.

## **4.3. Closure and ADR Referral**

Once the final internal decision is issued under Stage 3 (or at any point, by the player's choice), the complainant may refer the matter to a CGA-certified ADR provider at the Company's expense. The Company includes ADR contact details in its final response if the player remains dissatisfied.

## **5. Grounds for Non-Processing or Refusal**

While the Company aims to address all genuine complaints, it reserves the right to refrain from processing a complaint in the following circumstances:

- The complaint is submitted anonymously or with insufficient identifying information to verify the player's identity and account.
- The complaint is incoherent, lacking the requirements outlined above, and the player fails to respond to the Company's request for clarifications.
- The complaint appears to be frivolous, vexatious, or repetitive (e.g., multiple identical complaints from the same player without new evidence).

In such cases, the Company will notify the player of its decision not to process the complaint, stating the reasons.

## **6. Right to ADR at Any Time**

Pursuant to Article 5.3 of the LOK, Players can escalate a dispute directly to an ADR provider recognized by the CGA, without waiting for the Company's internal process to finish. However, attempting to resolve the issue internally may often be faster and more straightforward for both parties. The Company will provide contact details of the ADR provider(s) upon request or in any final response where the player expresses dissatisfaction.

## 7. Record Keeping and Confidentiality

The Company retains records of all submitted complaints, including date of receipt, substance of the complaint, outcome or resolution, and relevant communications. The Company treats all complaint-related information as confidential, disclosing it only as necessary to investigate the complaint or as required by law or regulatory authorities such as the CGA. All complaint records (submissions, acknowledgments, and final resolutions) are kept for at least five (5) years (or more if required by local regulations).

## 8. Publication and Availability

The Company publishes only the core aspects of its Complaint Policy in its Terms & Conditions for easy reference by players.

The more detailed internal Complaint Policy is considered internal document. However, upon request, the Company will provide a copy of the relevant Complaint Policy.

Publishing only a summary does not diminish any rights guaranteed to the player by the National Ordinance on Games of Chance (LOK) or the Curaçao Gaming Authority (CGA) regulations. Players may still exercise their right to submit a complaint, or escalate disputes to ADR, at any time.

## 9. Policy Review and Updates

This Policy is reviewed at least annually or when material regulatory changes occur. Any amendments must be approved by Senior Management before take effect.

The current version of this Policy takes effect on the date indicated in the header. Any major changes will be communicated to players in a suitable manner.

Approved by  
**Vivian Ersilia**, o.b.o. (SMES) Solutions for  
Management and Employment Support N.V. as  
Managing director

