

PLAYER COMPLAINTS POLICY

for

CLUBHOUSE MEDIA N.V.

VERSION CONTROL

Title	Player Complaints Policy		
Description	Complaint Intake, Handling, Determination and Dispute Resolution		
Date Created	December 2025		
Operative Date	August 2026		
Maintained By	Clubhouse Media		
Version Number	Modifications Made	Date Modified	Status
1.0	Initial draft. Not adopted and not filed.	Dec-2025	Superseded
2.0	Full redraft against CGA Player Complaints Policy Guidelines v1.1. Adds definitions, complaint submission form and intake routes, investigation and determination, the appointed ADR provider and escalation route, records and reporting, and governance. First version filed with the CGA.	Aug-2026	Operative

Table of Contents

1 · Purpose and scope	3
2 · Definitions	3
3 · Making a complaint	3
3.1 Customer support comes first.....	3
3.2 The Complaint Submission Form	4
3.3 Who may complain	4
3.4 Players who cannot access their account	4
3.5 Time limit.....	4
4 · How CHM handles a complaint.....	4
4.1 Acknowledgment	4
4.2 Investigation.....	5
4.3 Human handling.....	5
4.4 CHM's determination	5
4.5 Rights CHM does not restrict.....	6
5 · If a player is not satisfied	6
5.1 When the CHM internal process is complete	6
5.2 The CHM ADR provider.....	6
5.3 What an ADR decision means.....	6
5.4 The role of the CGA.....	6
5.5 Data shared with the CHM ADR provider.....	7
6 · Records and reporting	7
7 · Where this procedure is published	7
8 · What a player may complain about.....	7
9 · Governance	8

1 · Purpose and scope

This Policy sets out how Clubhouse Media N.V. ("CHM") manages player complaints and disputes for xolotto.com, in alignment with Article 5.3 of the National Ordinance on Games of Chance (*Landsverordening op de kansspelen*, "LOK") and the Curaçao Gaming Authority's Player Complaints Policy Guidelines.

Adherence is a requirement under the LOK. Failure to comply is addressed by the Curaçao Gaming Authority ("CGA") through its supervision, monitoring and enforcement procedures.

This Policy applies to all players of xolotto.com from the date of licence issuance and covers every complaint about any part of a player's relationship with CHM, in any language CHM operates in.

CHM is responsible for executing this Policy, under the supervision of the CHM Compliance Officer.

This Policy is based on regulatory requirements under the LOK. It does not affect or override applicable rules of private law, including Book 6 of the Civil Code of Curaçao concerning general terms and conditions.

2 · Definitions

Player Interaction — any written communication a player sends the CHM customer service team: general enquiries, feedback, or requests for information, assistance or clarification.

Complaint — a written expression of dissatisfaction by a player about CHM services, decisions, terms or conduct, indicating the player is unhappy and expects a response or resolution.

A complaint arises when the player first puts that dissatisfaction to CHM in writing, whether by email to customer service or by submitting the Complaint Submission Form. The CHM acknowledgment and resolution periods at section 4.1 run from that first written contact.

For the CHM complaints register and CHM reporting to the CGA, a complaint is counted when the player submits the Complaint Submission Form, or when a matter is escalated to alternative dispute resolution.

Dispute — a complaint not resolved to the player's satisfaction through the CHM internal process, escalated either within CHM or to an independent third party (an ADR provider or a court).

ADR — alternative dispute resolution, provided by an independent CGA-certified entity. The CHM ADR provider is identified at section 5.

3 · Making a complaint

3.1 Customer support comes first

Players may contact the CHM customer service team by email at any time. Most matters are resolved there, and where the matter is resolved at that stage no further step is required.

Most emails to customer service are enquiries, requests for help or feedback — Player Interactions, not complaints. Where an email instead expresses dissatisfaction with CHM services, decisions, terms or conduct and expects a response or resolution, it is a complaint

on receipt, and the acknowledgment and resolution periods run from that point rather than from submission of the Complaint Submission Form.

3.2 The Complaint Submission Form

Where a player wishes to make a complaint, an official Complaint Submission Form is available on the CHM website, completed and submitted online.

The form is reached from the CHM Complaints page.

The form asks for, at a minimum: the complainant's name, address and place of residence; the account number or user ID; the date of the disputed event; and a description of the conduct being disputed, using pre-set category topics. The date of the complaint is recorded automatically on submission.

The form is available in English, and in each other language in which CHM operates the site.

CHM may ask for supporting documentation. Anything CHM asks for will be reasonable in the context of the complaint.

3.3 Who may complain

A complaint may only be made by the registered player. Under LOK Article 1.3 section c, a player may not sell, donate, rent out, lease, pawn or pledge any claim against a CGA licence holder. The form is submitted from the player's logged-in account, which establishes this.

3.4 Players who cannot access their account

A player who is self-excluded, suspended or otherwise unable to log in may contact customer service by email without logging in.

Where such a player makes a complaint, the CHM customer service team completes the Complaint Submission Form on the player's behalf, recording the date of the player's original email as the date the complaint was received, as at section 4.1. A cooling-off period does not restrict access to the form, so a player in a cooling-off period makes a complaint in the ordinary way.

3.5 Time limit

A player may lodge a complaint free of charge at any time up to six months from the settlement of the bet, or from the incident complained about.

4 · How CHM handles a complaint

4.1 Acknowledgment

Every complaint is acknowledged in writing. The acknowledgment confirms receipt, explains how the complaint will be processed, and gives notice of how long resolution is expected to take.

The periods below run from the player's first written expression of dissatisfaction to CHM, not from submission of the Complaint Submission Form. Where a complaint reaches CHM by email to customer service and a form is filed afterwards, the periods run from the email.

How receipt is recorded. Every complaint is recorded through the Complaint Submission Form. Where the complaint arrived first by email, the form carries a received date set to the date of that email, and every period in this section is computed from the recorded received date rather than from the date the form was filed.

	Responsible gaming complaints	All other complaints
Acknowledged within	2 days	1 week
Resolution target	5 business days (best efforts)	4 weeks
If CHM needs longer	CHM tells the player; the delay will not exceed 2 weeks	Extended once, by up to 4 weeks, with prior written notice
If CHM is waiting on the player	A further 2 weeks may be needed	—

What counts as a responsible gaming complaint is not for CHM to decide. A complaint is categorised as responsible gaming in any case where it concerns the targeting of vulnerable players, or the availability or timely implementation of self-exclusion or cooling-off and the consequences that follow.

Acknowledgments are issued in the language of the site the player used.

4.2 Investigation

Investigations are fair, impartial and evidence-led. Where relevant CHM reconciles its system and transaction logs against the player's account of events. Every complaint is recorded in the CHM complaints register and a case record is kept.

If CHM needs further information from the player, CHM asks for it as early as possible, and always within the first four weeks. Where a player does not provide information CHM reasonably needs within that period, CHM may reject the complaint, giving detailed reasons.

Where CHM asks for information, CHM tells the player what is needed, why it is needed, and by when — and CHM would rather extend time than close a complaint on silence.

4.3 Human handling

Communications with a player about a responsible gaming complaint are conducted by a person, not by artificial intelligence. The same applies to any complaint that can reasonably be considered complex. Where AI is used at all in complaint handling, its records are monitored to ensure its recommendations are reasonable and consistent across like-for-like complaints.

4.4 CHM's determination

Every player receives a final determination in writing. It will be either:

1. a reasoned final assessment of the outcome, with supporting evidence where necessary or applicable; or
2. detailed reasons for not handling the complaint, including where the player has not provided information CHM reasonably required and asked for within the first four weeks.

Determinations cite the specific Terms and Conditions provision and, where relevant, the LOK article relied on.

4.5 Rights CHM does not restrict

Nothing in this Policy or in the CHM Terms and Conditions restricts a player's right to take legal action, or to contact the CGA directly about malpractice, breach of licence conditions, or whistleblowing.

5 · If a player is not satisfied

5.1 When the CHM internal process is complete

The CHM internal complaints process is complete in either of two situations:

1. CHM has issued its determination and the player has told CHM they remain dissatisfied.
2. The deadline CHM gave the player — including any extension CHM notified — has passed without a determination from CHM.

At that point the player may take the complaint to alternative dispute resolution.

5.2 The CHM ADR provider

ABC-ADR Limited, certified by the CGA as CGA/ADR/2025/02.

Website	https://abc-adr.com/
Lodge a complaint	https://abc-adr.com/complaint.php
Email	info@abc-adr.com
Registered address	167–169 Great Portland Street, London W1W 5PF, United Kingdom

A player lodges an ADR case directly with ABC-ADR at <https://abc-adr.com/complaint.php>. CHM does not refer cases on a player's behalf, and ADR is player-initiated only.

ADR is free to the player. CHM bears all costs of the ADR process.

CHM places no conditions on access to ADR. There is no minimum claim value, no requirement to attempt ADR before going to court, and CHM makes no attempt to bind a player to the outcome.

5.3 What an ADR decision means

ABC-ADR issues written, reasoned decisions within 90 days.

An ADR decision is binding on CHM and CHM implements it without delay.

Two consequences a player should understand before starting ADR:

- Once an ADR process has been completed, it cannot be started again with a different ADR entity, by either the player or CHM.
- A player who withdraws from an ADR process that has already begun should not expect to raise the same dispute again later.

5.4 The role of the CGA

The CGA does not resolve or decide individual complaints about gambling transactions on the CHM website, and does not review or overturn decisions made by CHM or by an ADR provider — unless a complaint is considered to have been inadequately handled.

A player may contact the CGA directly about malpractice, a breach of licence conditions, or whistleblowing. While the CGA does not mediate individual disputes, it uses the information to support its supervisory and enforcement work.

5.5 Data shared with the CHM ADR provider

Where a complaint goes to ADR, the player's relevant personal data is shared with ABC-ADR, which acts as an independent data controller, retains it for 5–7 years, and may share it onward with the CGA where required.

6 · Records and reporting

Register. Every complaint is recorded in the CHM complaints register, with the reference number, the dates received and determined, the category, the outcome, whether it was referred to ADR, and whether the player has taken legal action.

Retention. Records of unresolved complaints, and of complaints escalated to ADR or to legal proceedings, are kept for the lesser of five years or the period required by data protection law, statutes of limitation, or other applicable law or guidance.

Reporting to the CGA. CHM submits reports on 15 January and 15 June, covering complaints submitted since the previous reporting period. Each report summarises: the total number of complaints; the total settled, split into upheld and rejected; the number pending or unresolved; the number by category; the number referred to ADR; and the number and detail of complaints where a player has taken legal action.

CGA access. The CGA may request access to the CHM complaint records, and to any pending disputes, at any time.

Implementing ADR decisions. Responsibility for implementing an ADR decision sits with the CHM ADR liaison. Implementation is carried out without delay.

7 · Where this procedure is published

CHM's complaints procedure statement is visible and accessible on the CHM website as a standalone Complaints page. The complaints procedure is also set out in the CHM Terms and Conditions.

Between them they carry, at a minimum: how to contact customer service; what information a player needs to make a complaint, with a link to the form; the CHM timelines for response and resolution; players' rights to complain, including explicit rights to ADR and to regulatory escalation; an explanation of what an ADR decision means for a player's further legal and judicial rights; details of the ADR process and player rights; contact information for the CHM ADR provider; and clear information that the CGA does not mediate individual disputes but may be contacted where a player believes CHM is in breach.

The Complaints page carries how to contact customer service and how to make a complaint. The Terms and Conditions carry the remainder, including full details of the ADR process and the role of the CGA.

CHM displays its ADR provider's compliance seal in the site footer.

8 · What a player may complain about

A player may complain about any part of their relationship with CHM, or any incident relating to their participation in a game of chance, including but not limited to: deposits;

withdrawals; bonus terms and conditions; account closures or restrictions; alleged errors or unfairness in game outcomes; responsible gaming; treatment of player balances; KYC and verification; data protection; technical or software issues; AML concerns; issues involving minors; fraudulent games; fraudulent practices; licence or regulation; and unfair terms and conditions.

The CHM form groups these into categories to help route a complaint correctly. The categories are CHM's own, not the regulator's — a player is never prevented from complaining about something because it does not fit a category.

9 · Governance

Owner. The Compliance Officer owns this Policy and supervises its execution.

Review. Reviewed at least annually, and whenever the CGA's Player Complaints Policy Guidelines change, CHM ADR arrangements change, or a material change is made to the complaints process.

Version control. Each finalized revision takes the next version number — 2.1 onward — and is filed to the CGA Portal under it.