

LOWELL & PRUITT N.V.

registration number: 144786

registered address: Groot Kwartierweg 10, Livestrong Building, Curacao

Complaint Handling Procedure

Ver. 2.0. - JULY 2025

Revision History

Version №	Effective date	Approving official	Responsible officer	Next review date	Comments
1.0		Emoore N.V.	Compliance function		
2.0	18 th July 2025	Emoore N.V	Compliance function	18 th July 2026	

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1 Complaints Policy

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 and the Player Complaints Policy Guidelines version 1.1. of June 18th 2025, by the Curaçao Gaming Authority (“CGA”).

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.

Definitions:

ADR:	Alternative dispute resolution (“ADR”), which is offered in accordance with the ADR policy as is to be issued by the CGA.
Company:	Lowell & Pruitt N.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under registration number 144786.
Complaint:	A written expression of dissatisfaction by a player, relating to the Company’s services decisions, terms or conducts, whereby the player expects a response or resolution.
Customers:	Players who have opened an account on the Company’s website and have been accepted as customers.
Registered Player:	Customer who has completed the registration process on the Company’s platform or website, provided all required information, agreed to the terms and conditions, and whose account has been approved and activated.
Reportable Complaint:	when a Complaint Submission Form has been submitted by the Customer and/or a Complaint has been escalated to the ADR.

2 Complaints submission process

The Customer Support Team handles all Customer inquiries, ensuring prompt and high-quality responses. Players may lodge a complaint free of charge at any time up to six months of the settlement of the bet or the incident about which they are making a complaint.

In the case of P2P (such as poker) or ante post fixed odds betting the six month clock begins after the bet settlement or conclusion of a specific event rather than the placement of the wager.

Customers are entitled to submit complaints regarding in-running sports betting within six months of the relevant event. However, they should be advised that, due to the nature of in-running betting, certain data critical to the investigation may only be available for a limited time. Accordingly, it may be necessary to raise such complaints promptly. The operator cannot reasonably be expected to retain specific data indefinitely where it is no longer feasible to do so.

If the Complaint is initiated after the six-month period, the Company can decide not to handle the Complaint, depending on the subject of the Complaint.

Stages/Escalation of Complaint Resolution

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.

If you have a concern or dispute, please contact our Customer Support team as a first step.

You can reach us via:

- Email
- Live Chat

If your issue is not resolved through initial support, you may submit a formal complaint which is available in English and the language of the website you are using. To submit a complaint please download the form, fill it in, and email to us.

The form will ask for the following details:

- Your full name, address, and country of residence
- Your account number/account name (if applicable)
- The date of the complaint and the date of the issue or disputed event
- A clear description of the issue
- Amount in dispute
- URL

We may request documents to support your complaint. Any request will be reasonable and only made if necessary to help resolve your issue effectively.

Upon receiving this Complaint Submission Form, the Complaint becomes a Reportable Complaint. Depending on the nature of the Reportable Complaint, the designated customer support team member shall respond to the Customer.

The Company will provide the customer support function through a system designed to manage the support tickets, complaints, feedback and suggestions submitted by Customers. Initially, all customer support will be done through email, helpdesk chats and/or communication via telephone.

The Customer will receive a final conclusion of their Reportable Complaint, which can entail:

- A final assessment of the outcome/resolution of the Reportable Complaint;
- Detailed reasons for not handling the Reportable Complaint.

If you're not satisfied with our final response, you have the right to escalate your complaint to an approved Alternative Dispute Resolution (ADR) provider.

3 Role of the CGA

The CGA will not resolve or make decisions on any player complaints regarding gambling-related transactions on the operator's website(s).

Unless deemed to be inadequately handled, the decisions made by the operator and/or ADR provider will not be subject to reviewing and/or overturning by the CGA.

CGA can be contacted by the Customer with regards of matters such as malpractice, breach of license conditions or whistle blowing.

4 Complaint Resolution Process

Timeline: Responsible Gaming Complaints

Complaints related to responsible gaming will 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 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.

We aim to resolve such complaints within five (5) business days whenever possible.

Upon receiving a responsible gaming complaint, we will respond within two (2) days to:

- Confirm receipt of the complaint in writing
- Explain how the complaint will be processed
- Provide an estimated timeframe for resolution

If more time is needed to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two (2) 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 (2) weeks.

Timeline: All Other Complaint Types

The operator 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 (1) week of receiving a complaint, the operator will:

- Confirm receipt of the complaint in writing
- Explain how the complaint will be processed
- Provide an estimated timeframe for resolution

5 Complaint Response and Resolution

Every player who submits a formal complaint will receive a final written response.

The response will be either:

- A reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
- Detailed reasons for not handling the complaint. If we need additional information from you to address your complaint, we will request it within four (4) weeks of receiving your complaint. If you do not provide the required information within this timeframe, we may be unable to proceed and the complaint may be closed or rejected.
- 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.

6 Alternative Dispute Resolution (ADR)

In accordance with our licensing obligations under the LOK framework, we provide access to independent and free Alternative Dispute Resolution (ADR) services for all players. However, the Customer must first exhaust the Company's complaint procedure before the Customer can approach an ADR.

The Company will be engaging an independent ADR entity in Curaçao, approved by the CGA.

If we are unable to resolve your complaint internally, you are entitled to escalate the issue to an independent ADR provider.

However, in line with CGA guidance and to help ensure the effective use of ADR mechanisms, a minimum claim amount of EUR 5.000 has been established for a claim to be eligible for escalation to ADR, or if the complaints concerns a responsible gaming issue. This threshold has been introduced to prevent misuse of the ADR process and to ensure resources are directed toward meaningful disputes.

Once the ADR process is completed, it cannot be restarted with a different ADR provider - by either the player or the operator.

If a player voluntarily withdraws from an ADR process after it has started, the dispute may not be reopened at a later time.

More specific details of the ADR procedure will be provided as soon as the CGA has published their ADR policy.

The ADR procedure does not eliminate the possibility for Customers to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure.

7 Record keeping

The Company shall submit twice per year a report to the CGA detailing any Reportable Complaints and their outcomes, where known. Such reports will include:

- the total number of submitted Reportable Complaint;
- the total number of settled Complaints (whether upheld or rejected);
- the number of pending or unresolved Complaints;
- the number of Complaints per category (Responsible Gaming or other Complaints);
- the number of Complaints referred to the ADR;
- and the number and detail of Complaints for which the Customer has taken legal action.

Records of unresolved Complaints and/or Complaints that have been escalated to ADR or legal proceedings will be kept for five (5) years or the relevant time stipulated by data protection, statute of limitations or other relevant laws.

A summary of this policy may be published on the URL(s) of the Company.

8 Reasons for Complaint

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

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of player balances
- KYC and Verification
- Data Protection
- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation
- Unfair terms and conditions