

Prolific Trade N.V.

COMPLAINT HANDLING PROCEDURE

V. 2.0 - JULY 2025

Revision History

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Table of Contents

1. Policy Overview.....	4
2. Definitions	5
3, Responsibilities	6
4. Complaint Submission Process	6
5. Complaint submission form	6
6. Resolution Timelines.....	7
7. Final resolution	7
8. Alternative Dispute Resolution (ADR).....	8
9. Record-Keeping and Reporting	9
10. Reference in Terms and Conditions	10
11. Common Complaint Categories	10
12. Transition Deadline	11
13. Complaints to the CGA	12

1. Policy Overview

At Prolific Trade N.V, we recognize that player satisfaction and confidence are essential pillars of a trusted gaming environment. This Complaints Policy reflects our deep commitment to ensuring that all player concerns are addressed fairly, transparently, and in line with the highest industry and regulatory standards.

As a fully licensed operator under Prolific Trade N.V., the Company operates under the supervision of the Curaçao Gaming Authority (CGA). We adhere strictly to the requirements set forth by the CGA, including those outlined in Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Player Complaints Policy Guidelines Version 1.1 (June 2025).

Our objective is not only to resolve complaints efficiently but to create a process that is structured, easily accessible, and free of charge to the player. Through this policy, we aim to foster open dialogue, accountability, and continuous improvement by providing a formal mechanism for players to express dissatisfaction and receive timely and reasoned responses.

We believe that a fair and transparent complaints process enhances the integrity of our platform and supports responsible gaming practices. This document outlines how to submit a complaint, the timelines involved, your right to escalate concerns to an independent Alternative Dispute Resolution (ADR) provider, and our obligations to track, review, and report complaints in a consistent and lawful manner.

The Complaints Policy is publicly accessible and forms an integral part of our Terms and Conditions.. As a licensed operator under Prolific Trade N.V., we uphold the highest standards of integrity and accountability. Our player-first philosophy is grounded in a deep commitment to responsible gaming, honest communication, and consistent compliance with all legal obligations. We believe that maintaining a strong, transparent relationship with our players is key to long-term trust and operational excellence.

This policy ensures players have access to a clear and free process for complaint resolution, including independent Alternative Dispute Resolution (ADR) mechanisms. The policy is publicly accessible and forms part of the website's Terms and Conditions. transparently, fairly, and in full alignment with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the Curaçao Gaming Authority's (CGA) Player Complaints Policy Guidelines Version 1.1 (June 2025).

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2. Definitions

To ensure clarity and consistency throughout this policy, we define key terms that apply to the player complaints process. Understanding these definitions will help players navigate the procedure and know what to expect at each stage:

- **ADR:** Alternative dispute resolution ('ADR'), which is offered in accordance with the ADR policy as is to be issued by the CGA.
- **The Company:** Prolific Trade N.V., a limited liability company duly organized under Curacao law registered with the Chamber of Commerce and Industry in Curacao under number #150731
- **Reportable Complaint:** when a Complaint Submission Form has been submitted by the Customer and/or a Complaint has been escalated to the ADR
- **Player Interaction:** Refers to any form of communication initiated by the player to Prolific Trade N.V. This may include questions about account access, clarification on game results, or feedback on our services. Examples include a support ticket submitted via email, a live chat inquiry, or a social media message directed to our official account.
- **Complaint:** A complaint is a formal written expression of dissatisfaction submitted by a player, typically relating to an unresolved issue involving our services, game mechanics, financial transactions, or account-related actions. Common examples include disputes about withdrawn funds, failure to apply a bonus, or unexpected restrictions on account activity.
- **Dispute:** A dispute arises when a complaint has gone through our internal complaints process and remains unresolved to the satisfaction of the player. At this stage, the player may choose to escalate the issue to an Alternative Dispute Resolution (ADR) provider or, in some cases, initiate legal proceedings. Disputes usually involve more complex issues that require impartial third-party review.
- **Registered player:** Players who have opened an account on the Company's website and have been accepted as customers

These definitions form the foundation of our complaints process and guide how player concerns are categorized, assessed, and resolved.

3, Responsibilities

The Customer Support Team handles all player inquiries, ensuring prompt and high-quality responses.

Complaints can only be done by the Registered Player. A Registered Player is not allowed to sell, donate, rent out, lease, pawn or pledge, under any title, any of their (alleged) claims

4. Complaint Submission Process

Players who believe they have experienced an issue or unfair treatment while using Prolific Trade N.V are encouraged to submit a formal complaint. The complaint process is designed to be accessible, structured, and transparent, allowing every player the opportunity to express dissatisfaction and receive a considered response.

To ensure proper handling, all complaints must be submitted within **six (6) months** from the date of the incident or event giving rise to the complaint. Complaints submitted outside of this timeframe may not be eligible for review unless exceptional circumstances apply.

All Complaints regarding sports betting should be submitted as soon as possible. Due to the nature of the bet, delays may result in the unavailability of relevant data. Although the player may lodge a Complaint within six (6) months from the date of bet settlement, it is advised to take prompt action. The investigation regarding the Complaint may depend on the available data and the Company can't guarantee that all data is still available at that time.

5. Complaint submission form

Complaints must be submitted through the designated **Complaint Submission Form**, which can be completed online or downloaded from our website. The form is available in English and in any other language in which the site is officially offered. This standardised approach allows our support team to review cases efficiently and consistently.

At first instance, Customer Complaints are handled by our customer support Team. Customers may contact the customer support team using the contact details made available on the website via email and/or live chat. If the first contact by the customer support team is not satisfactorily, the player can file an official Complaint Submission Form, which will include:

- A. Player's name, address and place of residence;
- B. Player's account number or name;
- C. Date of the complaint and date of the disputed event;
- D. Description of the conduct being disputed;

- E. Amount in dispute.
- F. URL

Once received, the complaint will first be reviewed by our customer support team, who will attempt to resolve the matter promptly and professionally. If the issue cannot be resolved at this level or requires specialist input, it will be escalated internally for further review. Players will be kept informed of progress throughout the process.

6. Resolution Timelines

Timely communication and resolution are essential components of an effective complaint handling process. At Prolific Trade N.V, we are committed to ensuring that each player's complaint is acknowledged, assessed, and resolved within reasonable and transparent timeframes. Our timelines are designed to comply with industry best practices and the Curaçao Gaming Authority's standards while also providing flexibility for complex cases.

Upon receiving a formal complaint, we will promptly confirm receipt and assign the case to a designated support or compliance team member. Depending on the nature of the complaint, different resolution timelines apply:

- **Responsible Gaming Complaints:** These are treated with urgency due to their potential impact on player wellbeing. We will acknowledge receipt within **two (2) business days** and aim to resolve the matter within **five (5) business days**. If additional time is required for investigation, a single extension of up to **two (2) weeks** may be applied. Players will be notified accordingly. However, if a delay is caused due to lack or slow response from the players, the resolution period may be extended by another two (2) weeks.
- **General Complaints:** These include issues related to deposits, bonuses, technical malfunctions, account access, or customer service experiences. We will acknowledge these complaints within **seven (7) days** and strive to provide a full response within **four (4) weeks**. A one-time extension of an additional **four (4) weeks** may be granted if a delay is caused due to complexity, or lack or slow response from the player.

7. Final resolution

The player 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.

In case the player is not satisfied with the resolution and makes a further Complaint to that effect, the Customer can escalate the matter to an independent ADR entity. Once the

player informs the Company about the desire to escalate the matter to the ADR, the Company will provide the details of the ADR.

Clear and structured timelines for complaint resolution are essential to ensure that players feel heard and supported. These timelines are designed not only to provide prompt outcomes but also to maintain procedural fairness and transparency throughout the process. They reflect our commitment to balancing operational thoroughness with timely communication.

8. Alternative Dispute Resolution (ADR)

At Prolific Trade N.V, we recognize that not all complaints may be satisfactorily resolved through internal procedures. To provide additional assurance of fairness and objectivity, we offer players the right to escalate unresolved issues to an independent Alternative Dispute Resolution (ADR) provider.

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

ADR serves as a neutral, external mechanism for resolving disputes in a structured and impartial manner. This option becomes available once the internal complaints process has been completed and the player remains dissatisfied with the outcome.

Players may submit their case to a CGA-certified ADR provider, as listed in our Terms and Conditions. This process is **entirely free of charge to the player** and is designed to be accessible, timely, and transparent. Once a dispute is submitted to ADR, it is handled independently of Prolific Trade N.V and cannot be transferred to another provider or back to our internal team.

A decision of an ADR entity is binding on both the Company and the player who submitted the Reportable Complaint. The player can only bring Reportable Complaints to an ADR if:

- the value of the Reportable Complaint is more than EUR 5.000, - or
- if the Reportable Complaint pertains to a Responsible Gaming complaint

All decisions or recommendations issued by the ADR provider will be considered seriously by Prolific Trade N.V and may result in further review or corrective action, depending on the circumstances. The use of ADR helps reinforce accountability, promotes trust in our processes, and ensures compliance with the standards set forth by the Curaçao Gaming Authority (CGA).

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 players to bring proceedings against the Company to any Curaçao Courts instead of opting for an ADR procedure.

9. Record-Keeping and Reporting

Prolific Trade N.V recognizes the importance of maintaining comprehensive and accurate records as part of its commitment to regulatory compliance and continuous improvement. We implement rigorous internal controls to ensure that every player complaint is documented, processed, and archived in accordance with the requirements set by the Curaçao Gaming Authority (CGA).

All player complaints and associated communications—whether resolved internally or escalated to an ADR provider—are logged and tracked through our centralised compliance management system. Each entry includes detailed information about the complaint, the resolution steps taken, any supporting documentation, and the final outcome.

In line with CGA regulations, Prolific Trade N.V submits a comprehensive complaint report to the CGA on a **bi-annual basis**, with submission deadlines on **January 15** and **June 15** of each calendar year. These reports help the regulator monitor licensee performance, identify patterns or risks, and ensure that complaint handling standards are upheld across the industry.

Such report 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) year or the relevant time stipulated by data protection, statute of limitations or other relevant laws.

Where appropriate, anonymised insights derived from complaint data may also be used internally to improve our training programmes, operational processes, and player support systems.

10. Reference in Terms and Conditions

To ensure transparency and regulatory alignment, this Complaints Policy is explicitly referenced within Prolific Trade N. V's Terms and Conditions. Players are informed of their rights and options for submitting complaints and resolving disputes at multiple points within the website's legal framework.

The Terms and Conditions clearly state: - The availability and location of the standalone Complaints Policy - The obligation of the operator to provide structured access to complaint resolution - The required complaint submission process, including timelines - The right to escalate unresolved matters to a certified Alternative Dispute Resolution (ADR) provider - A statement clarifying that complaints are handled in accordance with Curaçao Gaming Authority (CGA) requirements - A link to this policy for full procedural details

This integration ensures that players are consistently made aware of their rights and the procedures they can follow when they feel that an issue has not been adequately addressed. It also reinforces Prolific Trade N. V's commitment to regulatory compliance, responsible gaming, and fair treatment of all users.

- The T&Cs will include: complaint form access, escalation flow, response timelines, ADR rights, CGA disclaimer, and policy link.

11. Common Complaint Categories

To assist players in understanding the scope of issues that may be raised through our complaints process, Prolific Trade N.V provides the following breakdown of typical complaint categories. While this list is not exhaustive, it reflects the most common areas of concern reported by players and monitored by our internal compliance team.

- **Deposit and Withdrawal Issues:** Complaints regarding failed or delayed transactions, unclear withdrawal limits, or payment method restrictions.
- **Bonus and Promotional Disputes:** Concerns relating to the application or interpretation of bonus terms, eligibility, wagering requirements, or the perceived fairness of promotional offers.
- **Account Access and Restrictions:** Issues where players are unable to access their accounts due to security locks, password recovery problems, or temporary account suspensions.
- **KYC and Verification Delays:** Frustration with delays in completing identity verification or dissatisfaction with document requirements.
- **Technical Malfunctions:** Complaints about platform glitches, game freezes, or disconnections that affect gameplay or bet settlement.

- **Responsible Gaming and Self-Exclusion:** Disputes involving self-exclusion enforcement, removal of limits, or concerns that Responsible Gaming requests were not processed appropriately.
- **Fairness of Game Outcomes:** Allegations that games did not perform as expected, including suspected rigging, system errors, or unexplained results.
- **Data Privacy and Information Handling:** Concerns about how personal information is used, stored, or shared in line with data protection regulations.

These categories serve as internal markers to help Prolific Trade N.V triage complaints effectively, route them to the appropriate team, and ensure that every concern is assessed against our Terms and Conditions, policies, and applicable regulations.

- Deposit/withdrawal issues
- Bonus disputes
- Account access/restrictions
- KYC delays
- Technical malfunctions
- Responsible Gaming/self-exclusion issues
- Suspected unfair game outcomes

12. Transition Deadline

This Complaints Policy shall take effect immediately upon publication and forms part of Prolific Trade N. V's overarching commitment to regulatory compliance and transparency. All procedures, submission channels, and internal escalation workflows described in this document are now active and enforceable.

To ensure timely regulatory alignment, this policy will be submitted to the Curaçao Gaming Authority (CGA) no later than **July 31, 2025**. This submission satisfies the operator's obligation under Article 5.3 of the National Ordinance on Games of Chance (LOK) and demonstrates our proactive approach to maintaining a clear and documented player complaint resolution framework.

Staff across relevant departments have been notified of the updated policy and trained accordingly to ensure consistent and fair application. Any legacy processes that may conflict with the new standards have been deprecated.

The policy will be reviewed periodically and updated in response to regulatory guidance, audit feedback, or internal assessments. Players will be notified of any material changes in advance, and the latest version will always be made available on our website. The policy is effective immediately.

13. Complaints to the CGA

The CGA will not resolve or make decisions on any player complaints nor will act as an ADR/escalation entity as it does not mediate in individual disputes.

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