

PLAYER COMPLAINTS POLICY

**VELATUS N.V.
163778**

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Approved by the Board of Directors



**Next Scheduled Policy Review
Date: June 2026**

1. POLICY STATEMENT

Velatus N.V. is a legally registered company in Curaçao, operating the website <https://1xbet.asia>. The company is licensed and regulated by the Curaçao Gaming Authority (CGA) under license number OGL/2024/1593/0817 and fully complies with all applicable gaming regulations and regional restrictions set by Curaçao authorities.

This Complaints Policy has been created to provide a clear, structured approach for receiving, managing, and resolving complaints submitted by players. It reflects Velatus N.V.'s strong commitment to fairness, transparency, and player protection, in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK) and the supervisory guidelines issued by the Curaçao Gaming Authority (CGA).

The primary objective of this Policy is to ensure all players have access to a reliable and efficient complaints resolution process that is impartial, responsive, and fair. Additionally, players retain the right to escalate unresolved complaints to independent and cost-free Alternative Dispute Resolution (ADR) services, in full compliance with Curaçao's regulatory standards.

This Policy becomes binding at the moment a player registers an account and begins using the gaming services provided by Velatus N.V. By explicitly accepting the Policy during registration (such as through a checkbox or confirmation pop-up) or by continuing to use the services, players are considered to have agreed to its terms.

The provisions in this Policy work in conjunction with, and do not override, any applicable private law obligations, including but not limited to those specified in Book 6 of the Civil Code of Curaçao regarding general terms and conditions. Nothing in this Policy limits or affects a player's legal rights under applicable civil law.

2. PROCEDURE FOR SUBMITTING COMPLAINTS

Complaint Timeframe

Players have the right to submit a formal complaint within six (6) calendar months of the date a bet is settled, the occurrence of the relevant incident, or the conclusion of the gaming event in question. This six-month window applies consistently across all gaming activities offered by Velatus N.V., including, but not limited to, peer-to-peer games (such as poker), ante-post fixed odds betting, and in-running (live) sports betting.

For in-running betting markets, where outcomes are influenced by real-time and rapidly changing data, players are strongly encouraged to file complaints as soon as possible. This recommendation reflects the nature of transient data, which may not be stored beyond standard data retention practices. As such, the company cannot reasonably be expected to preserve short-term data indefinitely.

Submitting an Official Complaint

To maintain fairness and procedural integrity, all complaints must be submitted directly by the registered player using Velatus N.V.'s official Complaint Submission Form. This form is available via the following channels:

- As a downloadable PDF or Word document on the company's website, which can be completed and sent via email and/or
- As an interactive online form accessible and submittable through the player's account dashboard.

To process a complaint effectively, the submission form must include the following minimum details:

- Full name, residential address, and player account ID (if applicable)
- The date of the complaint and the date of the incident or decision that prompted the complaint
- A clear and detailed description of the issue, along with supporting documentation or evidence, where available
- Selection of a relevant complaint category (e.g., deposit issue, withdrawal issue, technical malfunction, Responsible Gaming concern)

Players may be asked to provide additional information or documents necessary to conduct a thorough and fair review. Any such request will be reasonable and proportionate to the complexity of the issue at hand.

Oversight Role of the Curaçao Gaming Authority (CGA)

Players should note that the Curaçao Gaming Authority (CGA) does not intervene in individual disputes between players and licensed operators. Its role is supervisory in nature, using aggregated complaint data to monitor industry compliance and uphold regulatory standards.

Nevertheless, players retain the right to contact the CGA directly if they believe that Velatus N.V. has breached regulatory obligations, acted improperly, or violated licensing conditions. The company will not, under any circumstances, restrict or discourage players from reporting such concerns to the CGA.

3. COMPLAINT RESOLUTION PROCEDURE

How We Prioritize Your Complaint

At Velatus N.V., we treat every complaint with the seriousness it deserves. Once received, each complaint is logged, reviewed, and assigned a priority level based on its nature.

Complaints related to Responsible Gaming—such as self-exclusion concerns or the protection of vulnerable players—receive the highest priority, as your well-being is of utmost importance to us. We aim to resolve these cases within five (5) business days.

In rare and complex situations, an additional two (2) weeks may be required to complete a thorough investigation.

All other complaints are addressed in the order in which they are received. Our standard resolution timeframe is within four (4) weeks, though particularly complex issues may take up to eight (8) weeks to fully resolve.

Prompt Acknowledgement of Your Complaint

When you submit a complaint, we will acknowledge it within the following timeframes:

- Within 2 calendar days for Responsible Gaming-related issues
- Within 7 calendar days for all other complaints

Each acknowledgment includes:

- A confirmation of receipt and a unique case reference number
- An outline of what to expect during the investigation
- An estimated timeline for resolution, along with transparency about any extensions, if necessary

Our Complaint Investigation and Resolution Process

We handle all complaints with professionalism, care, and impartiality. Our investigation process includes:

- A comprehensive review of your account activity, transaction history, communications, and any relevant system data
- Internal coordination with departments such as Customer Support, Compliance, and Technical Operations
- A request for any additional information from you, if needed, to clarify or support the claim

Our trained Complaint Handlers ensure that every investigation is conducted fairly and transparently. Once your case is concluded, we will provide:

- A clear, written explanation of the outcome
- Any relevant supporting evidence
- Instructions on how to escalate your complaint to an independent Alternative Dispute Resolution (ADR) service if you are dissatisfied
- Contact information for the appropriate ADR provider(s)

Using AI — With Human Oversight

We use artificial intelligence (AI) tools to enhance efficiency in parts of our complaints process, such as sorting and pattern recognition. However, human oversight remains essential, especially for:

- All Responsible Gaming complaints
- Any complex or sensitive cases involving personal data

Any AI-assisted actions are always reviewed by trained personnel to ensure fairness, accuracy, and full compliance with applicable laws. Your rights remain fully protected throughout.

Alternative Dispute Resolution (ADR)

Your Right to Independent Support

While Velatus N.V. is committed to resolving all complaints fairly and efficiently, you have the right to escalate your case to an independent Alternative Dispute Resolution (ADR) provider if you remain unsatisfied after our internal process.

ADR services are provided free of charge. All associated costs are fully covered by Velatus N.V., ensuring that every player can seek an impartial review without financial barriers.

When ADR Is the Final Step

Once your complaint has been reviewed and a decision issued by an ADR provider, the ADR process is considered complete. The same matter cannot be submitted to another ADR body.

However, if the ADR outcome is not legally binding under applicable private law, you still retain the right to seek legal remedies through the courts, should you choose to do so.

Maintaining Fair Use of the ADR Process

To ensure the integrity of the ADR system and prevent misuse, Velatus N.V. may establish reasonable criteria for referrals—such as setting a minimum claim value. These safeguards are applied fairly, always in compliance with legal standards, and are subject to regulatory oversight.

4. RECORD-KEEPING

At Velatus N.V., we take our regulatory obligations seriously. In accordance with Curaçao's gaming regulations, we maintain comprehensive, accurate, and securely stored records for every player complaint we receive.

These records may include, but are not limited to:

- Copies of all submitted Complaint Forms — whether completed online or in hard copy
- All correspondence between you and our support team throughout the complaint process
- Internal investigation notes, including account activity logs, transaction records, and technical analysis reports
- Documentation of any referrals to Alternative Dispute Resolution (ADR) providers or legal proceedings initiated by either party

We retain these records for a minimum of five (5) years from the date your complaint is fully resolved — unless a shorter retention period is required under applicable data protection laws or other legal obligations.

Our data retention policies are fully aligned with Curaçao's regulatory framework and adhere to internationally recognized privacy standards, ensuring your information is handled with integrity and care.

5. REGULATORY REPORTING OBLIGATIONS

In addition to maintaining comprehensive internal records, Velatus N.V. submits detailed complaint reports to the Curaçao Gaming Authority (CGA) twice a year — on January 15th and June 15th. These biannual reports provide a transparent overview of all player complaints received during the reporting period and include the following information:

- The total number of complaints submitted
- A summary of resolved cases, indicating how many were upheld in the player's favor and how many were declined

- The number of complaints still under review or unresolved
- A classification of complaints by category (e.g., technical issues, payment delays, Responsible Gaming concerns)
- The number of complaints escalated to Alternative Dispute Resolution (ADR), along with their outcomes
- Instances where players initiated legal proceedings, including the nature of each case

The CGA reserves the right to request access to Velatus N.V.'s complaint records at any time as part of its regulatory oversight. We are fully committed to cooperating with the CGA and consistently ensure that all requested information is delivered promptly, accurately, and in accordance with the required format.

Velatus N.V. upholds the highest standards of transparency and accountability, reinforcing trust and integrity in every aspect of our operations.

6. TERMS AND CONDITIONS

This Complaints Policy forms an important part of Velatus N.V.'s Terms and Conditions and is presented to Players in a way that is always clear, visible, and easy to access. To ensure transparency, Velatus N.V.:

- Publishes this Policy as a standalone document with a clearly visible link on the homepage, registration page, and within the Player account dashboard.
- Summarizes the complaints process in the Terms and Conditions, including direct links to the full Policy for easy reference.
- Requires Players to actively confirm they've read and accepted this Policy during registration, typically through a checkbox or pop-up to ensure clear, informed consent. The Terms and Conditions also clearly outline:
- How to submit a Complaint and the expected timelines for resolution.
- Your rights to escalate unresolved Complaints to an independent ADR provider and, where appropriate, to seek legal remedies.
- A clear statement that while the Curaçao Gaming Authority (CGA) does not mediate individual disputes, it remains available for any concerns regarding potential regulatory non-compliance.

7. REASONS YOU MAY WISH TO SUBMIT A COMPLAINT

At Velatus N.V., we recognize there are many potential reasons you might wish to raise a formal Complaint. Below are some of the most common areas where issues might arise:

1. Deposit Issues

- Delays in processing deposits
- Deposits not appearing in your account

- Errors related to deposit transactions

2. Withdrawal Issues

- Unreasonable delays in processing withdrawals
- Rejected or blocked withdrawal requests
- Disputes over withdrawal eligibility

3. Bonuses & Promotions

- Disputes over bonus terms and conditions
- Concerns about the fairness of promotional offers
- Issues meeting wagering requirements

4. Account Closures or Restrictions

- Unexplained account suspensions or closures
- Unclear or unjustified account limitations

5. Game Fairness

- Suspected software malfunctions
- Disputes over game outcomes or results
- Concerns about fairness or transparency

6. Responsible Gaming Protections

- Failures to implement or respect self-exclusion requests
- Issues with cooling-off periods or player protection measures

7. KYC & Verification

- Concerns over identity checks or document requests
- Delays or disputes during the verification process

8. Data Privacy & Security

- Handling of your personal data
- Concerns over data storage, processing, or misuse

9. Technical or Software Issues

- Platform access problems
- Website or app malfunctions affecting your experience

10. Fraudulent Activities

- Suspicion of fraudulent behavior by third parties
- Concerns about platform security or integrity

11. Underage Access

- Reports of minors gaining unauthorized access to the platform

12. Licensing or Regulatory Concerns

- Suspected breaches of licensing requirements
- Alleged violations of applicable regulations

8. GOVERNING LAW AND JURISDICTION

This Policy is governed by and interpreted in accordance with the laws of Curaçao. Should a legal dispute arise that cannot be resolved internally or through Alternative Dispute Resolution (ADR), the matter will fall under the exclusive jurisdiction of the courts of Curaçao.

This does not affect any statutory rights you may have under the laws of your country of residence, where applicable.

9. DEFINITIONS

Player

Refers to any individual who has successfully registered an account with Velatus N.V., completed all required identity verification and due diligence procedures, and has engaged in one or more gaming activities provided under the company's licensed platform.

Complaint

A written expression of dissatisfaction submitted by a Player concerning any aspect of Velatus N.V.'s services, conduct, decisions, or terms. A Complaint is submitted with the expectation of receiving a response, explanation, or corrective action.

Dispute

A Complaint that remains unresolved to the Player's satisfaction after Velatus N.V.'s internal complaint resolution process has been fully completed and has subsequently been escalated to either an independent Alternative Dispute Resolution (ADR) provider or a competent court of law.

Alternative Dispute Resolution (ADR)

A process conducted by an independent, CGA-certified body that provides an impartial review of unresolved Complaints between Players and Velatus N.V. ADR services are offered at no cost to the Player, with all associated expenses covered by the operator.

Responsible Gaming Complaint

Any concern raised by a Player relating to the enforcement or effectiveness of responsible gambling measures—such as self-exclusion tools, cooling-off periods, or

any perceived failure to safeguard vulnerable individuals as outlined in Velatus N.V.'s Responsible Gaming Policy.

Technical Issue

Any malfunction, outage, or defect in the software, hardware, or systems operated by Velatus N.V. that interferes with a Player's ability to access or participate in gaming activities via the company's website, mobile applications, or other supported platforms.

Fraudulent Activity

Any deliberate act or omission intended to deceive, manipulate, or gain an unfair advantage. This may include, but is not limited to, account takeovers, the use of bots or automated scripts, bonus abuse, or the submission of falsified documentation.

Complaint Handler

A trained member of Velatus N.V.'s designated team responsible for receiving, investigating, and resolving Player Complaints in accordance with this Policy. All Complaint Handlers operate with neutrality and in full compliance with applicable regulatory standards.

10. CONTACT INFORMATION

If you need to reach Velatus N.V. regarding a Complaint, you can do so through any of the following channels:

General Enquiries
info-en@1xbet.asia

Complaints
security@1xbet.asia

Live Chat Support
Available **24/7** directly on our website.

Submit a Complaint Online here:
<https://1xbet.asia/>

**Alternative Dispute Resolution
(ADR) Contact Details**
<https://1xbet.asia/>

Curaçao Gaming Authority
Visit the CGA's official website:
<https://www.gamingcontrolcuracao.org/>