

PLAYER COMPLAINTS POLICY.

Policy -2026

Superbet88 International N.V.

Registration Number 161859

**Address Schottegatweg Oost 10 Unit 1-9 Bon Bini Business Center Curaçao
Statutory Seat Curaçao**

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1. Introduction, Regulatory Framework and General Purpose

This Player Complaints Policy establishes the legal, operational and procedural framework adopted by the Company for the receipt, registration, assessment, handling, resolution, documentation, monitoring and regulatory reporting of complaints and disputes submitted by players. This Policy has been drafted in strict compliance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen – LOK), as well as all guidelines, policies, supervisory rules and technical instructions issued by the Curaçao Gaming Authority (CGA).

Full compliance with this Policy is a mandatory licensing requirement. Any failure to comply with the procedures, timelines, transparency obligations, reporting duties or record keeping requirements set out herein may result in supervisory measures, corrective actions, administrative sanctions or enforcement proceedings by the CGA, in accordance with applicable law.

The Company recognises that an effective, transparent and well structured complaints handling system is a fundamental pillar of consumer protection, responsible gaming governance, regulatory compliance, operational integrity and reputational risk mitigation. This Policy ensures that all players have access to a clear, accessible, impartial, efficient and independent mechanism to raise concerns, seek explanations and obtain fair resolution of disputes, including free access to certified Alternative Dispute Resolution services where applicable.

This Policy does not replace, limit or override any applicable private law obligations, including but not limited to the provisions of Book 6 of the Civil Code of Curaçao relating to general terms and conditions. The Company remains fully responsible for ensuring that its contractual documentation and internal procedures comply with all applicable civil law requirements and acknowledges the need to seek independent legal advice when necessary.

The Player Complaints Policy is made publicly available on the Company's website and is clearly incorporated or expressly referenced in the Terms and Conditions. Where legally permitted, the Company may require explicit

acceptance of this Policy during registration or through equivalent electronic confirmation mechanisms.

2. Definitions and Key Concepts

For the purposes of this Policy, Player Interaction means any written communication initiated by a player and addressed to the Company through official customer support channels, including requests for information, clarification, assistance or feedback.

A Complaint means any written expression of dissatisfaction submitted by a player in relation to the Company's services, operational decisions, contractual terms, technical performance, game outcomes, payment processing, account management or any other aspect of the relationship between the player and the Company, where the player expects a response or resolution. For regulatory reporting purposes, a complaint is considered formally submitted once a Complaint Submission Form has been filed or when the matter has been escalated to Alternative Dispute Resolution.

A Dispute refers to a complaint that has not been resolved to the player's satisfaction through the internal complaints handling procedure and has been escalated internally for further review or externally to an independent ADR provider or a competent court.

3. Scope of Application and Eligibility

This Policy applies to all registered players of the Company, as well as former players and, where relevant, prospective users who submit complaints relating to account registration, verification or access to services.

This Policy is binding on all Company personnel, including directors, officers, executives, managers, customer support agents, compliance officers, risk analysts, payment specialists, technical staff and any contractors or third parties involved directly or indirectly in the complaint handling process. No employee is authorised to refuse, obstruct, discourage, delay, manipulate or fail to record a legitimate complaint.

The scope of this Policy covers all services and operations of the Company, including but not limited to deposits, withdrawals, bonuses, account restrictions or closures, identity verification, anti money laundering measures, responsible gaming tools, technical failures, game integrity, data protection, fraud prevention and regulatory compliance matters.

4. Complaint Submission Period

Players may submit complaints free of charge within a maximum period of six months from the settlement of the bet or from the occurrence of the event giving

rise to the complaint. In peer to peer games and ante post betting, the six month period begins from the conclusion or settlement of the relevant event.

In the case of in running sports betting, players are informed that although the six month submission window applies, early submission is strongly recommended, as certain technical or transactional data required for investigation may not be reasonably available after a limited period due to the nature of live betting systems.

Only the registered account holder is entitled to submit a complaint. The assignment, transfer, sale or donation of claims against the Company is prohibited under Article 1.3 of the LOK.

5. Complaint Submission Form and Acknowledgement

The Company provides an official Complaint Submission Form accessible electronically, either through an online submission interface or as a downloadable document that can be completed and submitted digitally. The form is made available in English and in the language of the website domain used by the player.

The form requires, at a minimum, the full identification of the complainant, address and place of residence, account identification details, relevant dates, a detailed description of the disputed matter and, where applicable, categorisation of the complaint. The Company may request reasonable supporting documentation strictly necessary to assess the complaint properly.

Upon receipt of a complaint, the Company issues a written acknowledgement confirming registration of the complaint, explaining the handling procedure and providing information on the applicable resolution timelines.

6. Internal Complaint Handling and Assessment Process

Each complaint received is formally registered in the Company's internal complaints management system and assigned a unique reference number to ensure traceability, accountability and regulatory oversight.

An initial review is conducted to verify the completeness of the information provided and to identify the nature and category of the complaint. Where additional clarification or documentation is required, the player will be contacted and granted a reasonable period to respond.

The complaint is then referred to the relevant internal departments, which may include payments, technology, security, compliance, risk management, responsible gaming or data protection teams. Each department conducts a detailed factual assessment, reviews internal logs, transactional records, policies and applicable rules, and submits its findings for consolidated review.

Based on the collected evidence and internal assessments, the Company issues a reasoned and evidence based decision in accordance with contractual terms,

internal policies and regulatory requirements. The final determination is communicated to the player in writing in a clear, comprehensive and transparent manner.

7. Resolution Timelines

Complaints relating to Responsible Gaming matters, including issues concerning vulnerable players, self exclusion, cooling off periods or player protection safeguards, are treated as a priority. The Company uses its best efforts to resolve such complaints within five business days. Acknowledgement of receipt and explanation of the procedure are provided within two business days, and any justified delay may not exceed two weeks unless extended due to player inaction.

All other complaints are assessed and resolved within four weeks from submission. Where complexity or insufficient information justifies an extension, the resolution period may be extended once for an additional four weeks, provided the player is informed in writing in advance.

8. Use of Artificial Intelligence

Artificial Intelligence tools may be used only in a supportive capacity and strictly in accordance with regulatory guidance. Complaints relating to Responsible Gaming or cases deemed complex are handled exclusively by human personnel. All AI assisted outputs are subject to continuous monitoring to ensure fairness, consistency, proportionality and non discriminatory treatment across comparable cases.

9. Alternative Dispute Resolution

If a complaint is not resolved through the internal process, the player is entitled to escalate the matter to an independent Alternative Dispute Resolution provider certified by the CGA. The Company maintains valid agreements with at least one certified ADR provider and bears all costs associated with the ADR process.

Once an ADR procedure has been completed, it cannot be recommenced with another ADR entity. Any measures designed to prevent abuse of the ADR process are applied cautiously and in compliance with civil law obligations and regulatory expectations, with each case assessed on its individual merits.

10. Record Keeping, Reporting and Regulatory Oversight

The Company maintains comprehensive, accurate and up to date records of all complaints, including submissions, correspondence, internal evaluations, decisions, ADR outcomes and supporting documentation.

Regulatory reports are submitted to the CGA on 15 January and 15 June each year, summarising all required complaint data in accordance with applicable guidelines. Records are retained for a minimum of five years or for the period

required under applicable data protection laws or limitation periods. The CGA may request access to complaint records at any time.

11. Transparency and Disclosure

The complaints handling procedure is clearly displayed on the Company's website and incorporated into the Terms and Conditions. Information provided includes customer support contact details, complaint submission requirements, resolution timelines, player rights, ADR procedures and clarification of the CGA's supervisory role as distinct from individual dispute mediation.

12. Transition Deadline

This Player Complaints Policy has been implemented and uploaded to the CGA Portal in compliance with the regulatory transition deadline of 31 July 2025 and remains subject to periodic review and updates in line with regulatory developments.

13. Final Provisions

The Company reaffirms its ongoing commitment to transparency, fairness, accountability and player protection. This Policy reflects the adoption of high standards of governance, compliance and regulatory responsibility, ensuring that all player complaints are treated with seriousness, diligence, impartiality and respect for applicable laws and supervisory expectations.

Policy written and reviewed by

Irati Aparecida Santos

Compliance Officer