

Approved 

Morganite Corporate Services B.V.
Managing Director

Effective Date: 31/07/2025

Next Review Date: 31/07/2026

Player Complaints Policy

Verse Corp B.V. operating under the trade names Khan-bet and Para-bets (hereinafter collectively referred to as “the Company”) is committed to fostering a transparent, equitable and efficient framework for the management and resolution of player complaints and disputes.

This Player Complaints Policy (hereinafter referred to as “Complaints Policy”) is established in strict compliance with the requirements stipulated under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”), as administered by the Curaçao Gaming Authority (CGA).

1. Purpose and Audience

This Complaints Policy outlines the framework for managing customer complaints and disputes, ensuring a transparent, fair and efficient process. The Complaints Policy guarantees customers access to a straightforward and effective dispute resolution process, including free alternative dispute resolution (ADR) services that prioritize quality and independence.

This Complaints Policy applies to all customers of the Company and offers ways to resolve disputes between the Company and customers by means of effective dispute resolution process.

2. Definitions

For the purposes of this Complaints Policy, the following terms shall have the meanings ascribed below:

Complaint - a written expression of dissatisfaction by a registered player concerning the Company’s services, decisions, terms or conduct, which indicates the player’s expectation of a response or resolution. For reporting purposes, a complaint is formally recognized upon submission of a Complaint Submission Form or escalation to ADR.

Dispute - a complaint that remains unresolved to the player’s satisfaction following the Company’s internal complaints process and has been escalated to an internal higher authority, an independent ADR provider or a court of law.

Player Interaction - any written communication initiated by a player and directed to the customer service team, encompassing general inquiries, feedback, requests for assistance or clarification regarding the Company’s services.

3. General Provisions

The Company handles customer complaints and disputes according to the national legislation of Curacao and the Complaints Policy.

The Company makes every possible effort to resolve all reported complaints promptly. Subject hereto, if the customer disagrees with the Company on any matter pertaining to the observance and fulfillment of a betting arrangement between the customer and the Company, including payouts, outcomes, odds and other material terms of the arrangement, as well as declaring such arrangement unconcluded or void, the customer agrees that any disputes shall be settled by serving a complaint to the Company.

4. Reasons for Complaint

The customer has the right to make a complaint regarding any part of relationship with the Company 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

5. Submitting a Complaint

Players may submit a complaint free of charge within six (6) months from the settlement of the bet or the incident giving rise to the complaint.

For peer-to-peer (P2P) games (e.g., poker) or ante post fixed odds betting, the six (6) month period commences upon the settlement of the bet or the conclusion of the relevant event, rather than the wager placement date.

For complaints related to in-running sports betting, players are advised that prompt submission within the six (6) month window is critical, as investigative data specific to such complaints may not be retained by the Company beyond a reasonable period due to the dynamic nature of in-running betting.

6. Stages and Escalation of Complaint Resolution

Complaints may only be lodged by the registered player associated with the account. Pursuant to Article 1.3, section c of the LOK, players are prohibited from transferring, selling, donating, leasing, or otherwise assigning their claims against Company to third parties.

Players must first engage the Company's customer support team via email or live chat, accessible through the Company's websites used by the player (e.g., support@khan-bet.com or support@para-bets.com).

Formal Complaint Submission should the initial interaction fail to resolve the issue, players may submit a formal complaint using the Complaint Submission Form, available as a downloadable PDF document, which may be completed and emailed to the Company's support team

The Complaint Submission Form shall include, at a minimum:

- i. the complainant's full name, address, and place of residence.
- ii. the complainant's account number (if applicable).
- iii. the date of the complaint and the date of the disputed event.
- iv. a detailed description of the disputed conduct, with options to select from predetermined complaint categories (e.g., deposit issues, responsible gaming concerns).

Documents supporting and substantiating such a complaint shall be enclosed. In default of sufficient grounds for the complaint, the same shall be returned without examination. Additional supporting documentation may be requested by the Company, provided such requests are reasonable and relevant to the complaint's resolution.

7. Complaint Resolution and Response

Within one (1) week of receiving a complaint, the Company will:

- confirm receipt of the complaint in writing via email or preferred communication method,
- provide an explanation of how the complaint will be processed,
- expected timeline for resolution.

The Company will assess and respond to complaints within four (4) weeks.

If necessary, due to complexity or lack of information, this period may be extended once by an additional four (4) weeks, with prior written notice to the complainant.

The customer will always receive a final determination of their complaint in writing.

The response will be either:

- 1.a reasoned final assessment of the outcome/resolution of the complaint with supporting evidence if necessary or applicable.
- 2.detailed reasons for not handling the complaint.

If additional information is reasonably required to address the complaint fully, the Company must have requested this information within the initial four (4) week time period. Should the complainant not provide the necessary information within that time period, the Company may reject the complaint.

Where for any reason the Company does nor or is unable to resolve an issue to the customer's satisfaction, the complainant is informed that the matter may be escalated by the customer to an independent ADR entity.

Complaints related to responsible gaming will be prioritized by the Company due to potential impacts on player well-being and will be resolved within five (5) business days. If more time is needed, customers will be informed of the delay, which cannot exceed two (2) weeks.

8. Access to ADR

If a complaint cannot be resolved internally, The Company provides the client with the opportunity to use alternative dispute resolution methods as part of the complaint escalation process. The alternative dispute resolution will be offered at the expense of the Company.

The contact information for the ADR provider will be included in all complaint communications and in the Terms and Conditions of the Company's websites.

The judgment of the ADR process is binding on the Company. However, it does not supersede a customer's right to take a dispute to court.

9. Authority Escalation

The CGA will not resolve or make decisions on complaints regarding gambling-related transactions.

However, if the customer believes the Company is in breach of regulations, they may contact the Curacao Gaming Authority via an Online Form available on the CGA website.

10. Record-Keeping

The Company keeps a log of all complaints, including those:

- resolved internally (whether upheld or rejected)
- unresolved
- escalated to ADR
- escalated to legal proceedings

All complaint records will be securely maintained for at least five (5) years, including details of unresolved and complaints that have been escalated to ADR or legal proceedings.

11. Regulatory Reporting

The Company will submit reports to the CGA on January 15th and June 15th and every year, summarizing the following:

- a. total number of complaints made
- b. total number of complaints closed (settled and rejected)
- c. number of pending or unresolved complaints.
- d. number of complaints by category.
- e. number referred to ADR and the subsequent outcomes of each.
- f. number and detail of complaints for which a player has taken legal action.

Verse Corp B.V. is dedicated to ensuring a fair and transparent complaints process, prioritizing player satisfaction and regulatory compliance.

Complaint Submission Form

This form is to be used by players for the formal submission of a complaint, in accordance with the Player Complaints Policy. Please complete all fields accurately. Attach supporting documentation as necessary.

1. Complainant Information

Full Name: _____

Address: _____

City & Country of Residence: _____

Email Address: _____

2. Account Details

Username / Account Number: _____

Platform / Website Name: _____

3. Complaint Details

Date of Complaint Submission: _____

Date of Incident or Disputed Event: _____

Select Complaint Category (check one or more):

- ☐ Deposit issues
- ☐ Withdrawal issues
- ☐ Bonus terms and conditions
- ☐ Account closures or restrictions
- ☐ Alleged unfair game outcome
- ☐ Responsible gaming
- ☐ KYC and Verification
- ☐ Data Protection
- ☐ Technical/Software issues
- ☐ AML concerns
- ☐ Minor involvement
- ☐ Fraudulent games
- ☐ Fraudulent practices
- ☐ License or regulation issues
- ☐ Other: _____

4. Description of Complaint

Provide a clear description of the issue being raised:

5. Supporting Documentation

List and attach all documents relevant to this complaint (screenshots, emails, receipts, etc.):

6. Declaration

I confirm that the information provided above is true and complete to the best of my knowledge.
I understand that false or misleading submissions may result in my complaint being rejected.

Signature: _____ Date: _____