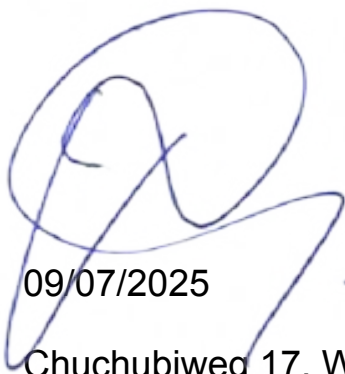


PREVAILER B.V.
149548

PLAYER COMPLAINTS POLICY

Approved by the Board of Directors:

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a horizontal line and a small upward stroke.

09/07/2025

Chuchubiweg 17, Willemstad, Curaçao

1. Overview of the Player Complaints Policy

This Player Complaints Policy (“Policy”) has been formally adopted and published by Prevalier B.V., a private limited liability company incorporated under the laws of Curaçao, registered with company number 149548, and holding a valid license issued by the Curaçao Gaming Control Board under license number OGL/2024/341/0759.

This Policy provides a structured and comprehensive framework for the receipt, management, and resolution of Complaints submitted by Players. It reflects Prevalier B.V.’s commitment to upholding the highest standards of fairness, transparency, and Player protection. The company’s procedures are fully aligned with the requirements of 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 purpose of this Policy is to guarantee all Players access to a clear, effective, and impartial complaints resolution mechanism. It ensures that Player concerns are addressed promptly and equitably, and affirms the Player’s right to escalate any unresolved Complaint to independent and cost-free Alternative Dispute Resolution (ADR) services, in compliance with Curaçao’s regulatory framework.

This Policy applies to all Players from the moment they register an account and use the gaming services provided by Prevalier B.V. Players are deemed to have accepted the provisions of this Policy either through explicit acknowledgment during the registration process—such as ticking a checkbox or confirming a pop-up notification—or by continuing to engage with the company’s services.

The provisions of this Policy are designed to complement and operate in harmony with applicable private law obligations, including, but not limited to, those set out in Book 6 of the Civil Code of Curaçao regarding general terms and conditions. Nothing in this Policy shall be construed as limiting or overriding any rights granted to Players under applicable civil law.

2. Definitions

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

Player

A Player is any natural person who has successfully registered an account with Prevalier B.V., completed all required identity verification and customer due diligence procedures in accordance with regulatory standards, and engaged in one or more gaming or betting activities offered through the company’s licensed platform.

Complaint

A Complaint refers to any written statement submitted by a Player expressing dissatisfaction with any aspect of Prevalier B.V.’s services, operations, decisions, or contractual terms, and seeking a response, clarification, or remedial action from the company.

Dispute

A Dispute arises when a Complaint remains unresolved to the Player’s satisfaction following

the completion of Prevailer B.V.'s internal complaints process and has been escalated either to an independent Alternative Dispute Resolution (ADR) entity or, where applicable, to a competent court of law.

Alternative Dispute Resolution (ADR)

Alternative Dispute Resolution (ADR) is the impartial process conducted by an independent entity certified by the Curaçao Gaming Authority (CGA) to review and resolve unresolved Complaints between Players and Prevailer B.V. ADR services are provided at no cost to the Player, with all expenses fully covered by the company.

Responsible Gaming Complaint

A Responsible Gaming Complaint includes any concern raised by a Player regarding the implementation, enforcement, or adequacy of responsible gambling measures. This encompasses, but is not limited to, the timely processing of self-exclusion or cooling-off requests and any perceived failure to protect vulnerable individuals in accordance with Prevailer B.V.'s Responsible Gaming Policy.

Technical Issue

A Technical Issue means any failure, malfunction, or disruption in the software, hardware, or systems operated by Prevailer B.V. that negatively impacts a Player's ability to access or participate in gaming activities, whether via desktop, mobile applications, or other supported platforms.

Fraudulent Activity

Fraudulent Activity includes any action, omission, or scheme intended to deceive, defraud, or gain an unfair advantage within the company's gaming services. Examples include unauthorized account access, misuse of automated tools or bots, abuse of bonuses or promotions, and the submission of falsified identification or verification documents.

Complaint Handler

The Complaint Handler refers to the designated personnel or team within Prevailer B.V. responsible for receiving, investigating, and resolving Player Complaints in accordance with this Policy. Complaint Handlers are trained in regulatory compliance requirements and are expected to act impartially and fairly throughout the resolution process.

3. Complaint Submission

3.1. Timeframe for Submitting Complaints

Players of Prevailer B.V. may submit a Complaint within six calendar months from the date of the bet settlement, the occurrence of the incident in question, or the conclusion of the relevant gaming event. This six-month period applies consistently across all gaming services offered by the company, including peer-to-peer games such as poker, ante-post fixed odds betting, and in-play sports markets.

In the context of in-play betting markets, where outcomes and decisions often depend on rapidly changing data, Players are strongly encouraged to submit their Complaints as soon as possible. Due to the dynamic nature of such data, Prevailer B.V. may not be able to retain this information indefinitely beyond its standard data retention practices.

3.2. Procedure for Submitting Complaints

To ensure fairness and consistency, only registered Players are permitted to submit a Complaint. All Complaints must be submitted using the official Complaint Submission Form provided by Prevailor B.V., which is available in the following formats:

- A downloadable PDF or Word document accessible from the company's website, which can be completed and returned via email (or)
- An interactive online form that can be completed and submitted directly through the Player's account dashboard on the platform.

The Complaint Submission Form requires Players to provide, at a minimum, the following information:

- Full legal name, residential address, and Player account identifier (if applicable).
- The date of submission and the date of the event or decision giving rise to the Complaint.
- A detailed description of the issue, supported by relevant documents or evidence where possible.
- The appropriate category of Complaint selected from a predefined list (e.g., deposit issues, withdrawal concerns, technical malfunctions, Responsible Gaming matters).

Players should note that Prevailor B.V. may request additional information or documentation deemed necessary for a full and fair investigation. Any such requests will be proportionate to the complexity and nature of the Complaint.

3.3. Role of the Curaçao Gaming Authority (CGA)

Players should understand that the Curaçao Gaming Authority (CGA) does not intervene in individual disputes between Players and licensed operators. The CGA operates in a supervisory capacity, using aggregated Complaint data to monitor licensee compliance and support regulatory enforcement actions when necessary.

However, Players retain the right to report concerns directly to the CGA if they believe Prevailor B.V. has engaged in regulatory breaches, malpractice, or conduct that violates its licensing obligations. The company will not impose any restrictions on a Player's ability to contact the CGA in such cases.

4. Resolution Process

4.1. Prioritisation of Complaints

All Complaints submitted to Prevailer B.V. are systematically recorded and reviewed to determine their priority. Complaints concerning Responsible Gaming issues—such as failures to apply self-exclusion measures or concerns regarding the protection of vulnerable individuals—are treated with priority due to their potential impact on Player welfare.

For Responsible Gaming Complaints, Prevailer B.V. aims to issue a final response within five business days. In exceptional cases where the complexity of the matter or external factors necessitate additional time, this period may be extended by up to two additional weeks.

Other categories of Complaints are addressed in the chronological order they are received. The target resolution timeframe for these is four weeks, which may be extended once by an additional four weeks for particularly complex cases, provided that the Player is notified in advance.

4.2. Confirmation of Receipt

Upon receiving a Complaint, Prevailer B.V. will provide a formal acknowledgment in writing within the following timeframes:

- Within two calendar days for Responsible Gaming-related Complaints.
- Within seven calendar days for all other types of Complaints.

This acknowledgment will include:

- Confirmation of receipt and assignment of a unique reference number for tracking purposes.
- A summary of the steps to be followed during the investigation and resolution process.
- The expected timeframe for resolution, along with a notice of possible extensions and the circumstances in which they may apply.

4.3. Investigation and Resolution

Each Complaint is investigated thoroughly and impartially. The investigation process includes:

- Reviewing relevant account details, transaction logs, system records, and communication history.

- Collaborating with internal departments such as Customer Support, Compliance, and Technical Operations to ensure a comprehensive understanding of the Complaint.
- Requesting additional information or documentation from the Player when necessary to facilitate a complete investigation.

The designated Complaint Handler ensures that all investigations are conducted diligently and transparently. Upon conclusion of the investigation, the Player will receive:

- A detailed written explanation of the outcome, supported by relevant evidence where applicable.
- Information regarding the Player's right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider if they remain dissatisfied.
- Contact details for the ADR provider(s) engaged by Prevalier B.V.

4.4. Use of Artificial Intelligence (AI)

Prevalier B.V. may utilise artificial intelligence tools to support certain aspects of complaint management, such as triaging submissions or identifying trends. However, human oversight remains mandatory in specific circumstances, including:

- Complaints involving Responsible Gaming issues.
- Complaints of a complex nature or those involving sensitive personal or financial information.

All resolutions that involve AI assistance are subject to human review to ensure fairness, accuracy, and compliance with regulatory requirements while safeguarding Player rights.

5. Alternative Dispute Resolution (ADR)

If a Player remains dissatisfied after exhausting the internal complaints procedure of Prevalier B.V., they have the right to escalate their Complaint to an independent Alternative Dispute Resolution (ADR) provider. ADR services are offered free of charge to the Player, and all associated costs are fully covered by Prevalier B.V. in compliance with its licensing and regulatory obligations.

5.1. Binding Nature of ADR Decisions

Once the ADR process is concluded and a final determination has been issued by the certified ADR provider, neither the Player nor Prevalier B.V. may reopen the matter with another ADR entity. However, Players retain the right to pursue legal remedies through the appropriate judicial system where the ADR decision is not legally binding under applicable private law.

5.2. Safeguards Against Misuse of ADR Services

To maintain the integrity of the ADR process, Prevailer B.V. may, after consultation with its legal advisors, establish reasonable parameters for referrals. These may include minimum claim thresholds or other measures designed to prevent misuse of ADR services. All such measures will be proportionate, fair, and fully compliant with applicable civil legislation and will remain subject to the oversight of the Curaçao Gaming Authority.

6. Record-Keeping and Reporting Procedures

6.1. Maintenance of Records

Prevailer B.V. acknowledges its regulatory obligation under Curaçao's framework to maintain comprehensive, accurate, and securely stored records of all Complaints submitted by Players. These records play a critical role in ensuring transparency, accountability, and compliance with supervisory requirements. The records maintained by the company include, but are not limited to:

- Copies of all Complaint Submission Forms received, whether submitted electronically or in physical form.
- All correspondence exchanged between the Player and company representatives during the resolution process.
- Internal investigation reports and supporting documentation such as account activity logs, transaction histories, and technical evaluations where relevant.
- Records of any referrals or escalations to an Alternative Dispute Resolution (ADR) provider, as well as any legal proceedings initiated by either party.

All records are retained for a minimum period of five years from the date of final resolution of the Complaint, unless a shorter retention period is required under applicable data protection laws, statutes of limitation, or other relevant legal provisions. Prevailer B.V.'s data retention practices are fully aligned with Curaçao's regulatory requirements and applicable privacy legislation.

6.2. Reporting to the Regulatory Authority

In addition to maintaining internal records, Prevailer B.V. is obligated to submit detailed biannual reports to the Curaçao Gaming Authority (CGA). These reports, due on January 15th and June 15th each year, must include:

- The total number of Complaints submitted by Players during the reporting period.
- A breakdown of resolved Complaints, showing how many were upheld in favor of the Player and how many were rejected.

- The number of Complaints still pending or unresolved as of the reporting date.
- Categorization of Complaints by type, such as technical issues, payment disputes, or Responsible Gaming concerns.
- The number of Complaints referred to ADR and the outcomes of those referrals.
- Details of any cases where Players have initiated legal proceedings against the company.

The CGA reserves the right to request access to any Complaint records at any time to support its supervisory functions. Prevailer B.V. will cooperate fully with such requests, ensuring that all information is provided promptly and in the prescribed format.

7. Terms and Conditions Integration

This Complaints Policy forms an integral part of Prevailer B.V.'s Terms and Conditions and is presented to Players in a way that ensures clarity, visibility, and ease of access.

To achieve this, Prevailer B.V. has adopted the following measures:

- The full Complaints Policy is published as a standalone document, accessible via a clearly visible link on the company's homepage, registration page, and within the Player account dashboard.
- A summary of the complaints procedure is included in the Terms and Conditions, accompanied by direct hyperlinks leading to the complete Policy text.
- During the account registration process, Players are required to acknowledge and accept the Complaints Policy. This acknowledgment is obtained through mechanisms such as a mandatory confirmation checkbox or a pop-up notification, ensuring informed consent before registration is finalized.

The Terms and Conditions also provide:

- A clear explanation of the Complaint submission process, including applicable timelines for response and resolution.
- Information regarding the Player's right to escalate unresolved Complaints to an independent Alternative Dispute Resolution (ADR) provider and to seek further legal remedies where appropriate under the law.
- A statement clarifying that while the Curaçao Gaming Authority (CGA) does not intervene in individual disputes, it may be contacted by Players to report regulatory breaches or non-compliance by the operator.

8. Reasons for Complaints

Players of Prevalier B.V. have the right to submit a Complaint regarding any aspect of their engagement with the company's gaming and betting services. The following examples, while not exhaustive, illustrate typical types of issues that may give rise to a Complaint:

- **Deposit Issues** – Delays, errors, or non-processing of deposits into Player accounts.
- **Withdrawal Issues** – Disputes over withdrawal requests, including delays, rejections, or partial payments.
- **Bonus Terms and Conditions** – Concerns regarding the fairness, transparency, or application of promotional offers and bonus requirements.
- **Account Closures or Restrictions** – Allegations of unjustified account suspensions, closures, or restrictions limiting account access or use.
- **Game Fairness** – Complaints relating to software errors, technical malfunctions, or outcomes perceived as unfair.
- **Responsible Gaming Concerns** – Issues regarding the company's implementation of responsible gambling measures, such as failures to process self-exclusion or cooling-off requests.
- **KYC and Verification Procedures** – Complaints about delays, difficulties, or perceived unfairness in identity verification and due diligence processes.
- **Data Protection and Privacy** – Concerns about the collection, processing, or safeguarding of Player personal data.
- **Technical or Software Malfunctions** – Problems affecting platform accessibility, functionality, or performance.
- **Fraudulent Activities** – Allegations of fraud by third parties or the company itself.
- **Minors' Access** – Reports of underage individuals accessing the gaming services.
- **License or Regulatory Breaches** – Suspected violations of licensing conditions or non-compliance with Curaçao regulatory requirements by Prevalier B.V.

Players are encouraged to include detailed information and relevant supporting evidence when submitting a Complaint to enable an efficient and thorough investigation.

9. Governing Law and Jurisdiction

This Complaints Policy is governed by and shall be interpreted in accordance with the laws of Curaçao. Any legal proceedings arising from or in connection with this Policy, which are

not resolved through Prevailer B.V.'s internal complaints procedure or via Alternative Dispute Resolution (ADR), shall fall under the exclusive jurisdiction of the competent courts of Curaçao.

This provision does not prejudice the rights of Players to initiate legal proceedings in their country of residence where such rights are granted under applicable local laws.

10. Contact Information

Players wishing to submit a Complaint or seek further information may contact Prevailer B.V. through the following channels:

- **General Enquiries:** info-en@betwinner.com
- **Complaints Department:** complaints@betwinner.com
- **Live Chat Support:** Available 24/7 via <https://betwinner.com>
- **Complaint Submission Form:** Accessible online at <https://betwinner.com>
- **Alternative Dispute Resolution (ADR):** Details available at <https://betwinner.com>
- **Curaçao Gaming Authority:** <https://www.gamingcontrolcuracao.org>