

ASPRO N.V.

PLAYER COMPLAINTS POLICY

17/07/2025

Approved by the Board of Directors:

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1, Dr. Henri Fergusonweg, Willemstad, Curaçao

1. Definitions

For the purposes of this Complaints Policy, the following definitions shall apply:

Player

A Player refers to any natural person who has successfully registered an account with Aspro N.V., completed all required identity verification and due diligence procedures in accordance with regulatory standards, and participated in one or more gaming activities offered through the company's licensed platform.

Complaint

A Complaint means any written statement submitted by a Player expressing dissatisfaction with any aspect of Aspro N.V.'s services, operations, decisions, or contractual terms, and in which the Player seeks a response, clarification, or corrective action.

Dispute

A Dispute arises when a Complaint remains unresolved to the Player's satisfaction after completion of Aspro N.V.'s internal complaints process and has been escalated either to an independent Alternative Dispute Resolution (ADR) provider or, where applicable, to a competent court of law.

Alternative Dispute Resolution (ADR)

Alternative Dispute Resolution (ADR) refers to the impartial process conducted by an independent entity certified by the Curaçao Gaming Authority (CGA) for reviewing and resolving unresolved Complaints between Players and Aspro N.V. ADR services are offered free of charge to the Player, with all associated costs borne entirely by the company.

Responsible Gaming Complaint

A Responsible Gaming Complaint includes any issue raised by a Player concerning the application, enforcement, or adequacy of responsible gambling measures. This encompasses, but is not limited to, the timely activation of self-exclusion or cooling-off requests and any perceived failure to protect vulnerable individuals in line with Aspro N.V.'s Responsible Gaming Policy.

Technical Issue

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

Fraudulent Activity

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

Complaint Handler

The Complaint Handler refers to the designated personnel or team within Aspro N.V. responsible for receiving, investigating, and resolving Player Complaints in accordance with

this Policy. Complaint Handlers are trained in regulatory compliance and are expected to carry out their duties impartially and professionally.

2. Overview of the Player Complaints Policy

This Player Complaints Policy ("Policy") has been formally adopted and published by Aspro N.V., a private limited liability company incorporated under the laws of Curaçao, registered with company number 140802, and duly licensed by the Curaçao Gaming Control Board under license number OGL/2024/565/0553.

This Policy establishes a clear and structured framework for the receipt, management, and resolution of Complaints submitted by Players. It reflects Aspro N.V.'s commitment to upholding the highest standards of fairness, transparency, and Player protection, in full alignment 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 purpose of this Policy is to provide all Players with access to an impartial, robust, and effective complaints resolution process. It ensures that Player concerns are addressed in a timely and equitable manner while confirming the Player's right to escalate unresolved Complaints 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 engage with the gaming services provided by Aspro N.V. Acceptance of the Policy is established either through explicit acknowledgment during registration—such as ticking a checkbox or accepting a pop-up notification—or through continued use of the company's services.

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

3. Complaint Submission Process

3.1 Timeframe for Filing a Complaint

Players of Aspro N.V. may submit a Complaint within six calendar months from the date a bet was settled, the occurrence of the relevant incident, or the conclusion of the gaming event to which the Complaint relates. This six-month period applies uniformly across all gaming activities offered by the company, including peer-to-peer games such as poker, ante-post fixed odds betting, and in-play sports betting markets.

For in-play betting markets, where outcomes and decisions depend on rapidly changing data, Players are strongly encouraged to submit their Complaints as soon as practicable. This recommendation acknowledges that certain data points may not remain accessible indefinitely due to their transient nature, and Aspro N.V. cannot reasonably be expected to retain such information beyond standard retention periods.

3.2 Procedure for Submitting a Complaint

To ensure fairness and consistency, only registered Players may submit a Complaint. All Complaints must be filed using the official Complaint Submission Form provided by Aspro N.V., which is available in the following formats:

- A downloadable PDF or Word document accessible via the company's website, which can be completed and submitted via email.
- 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 that gave rise to the Complaint.
- A detailed description of the issue, supported where possible by relevant documentation or evidence.
- Selection of the appropriate category of Complaint from a predefined list (e.g., deposit issues, withdrawal delays, technical malfunctions, Responsible Gaming concerns).

Players should also note that Aspro N.V. may request additional information or documentation necessary to conduct a thorough and fair investigation. Such requests will always be proportionate to the complexity and nature of the Complaint.

3.3 Role of the Curaçao Gaming Authority (CGA)

Players should be aware that the Curaçao Gaming Authority does not mediate individual disputes between Players and licensed operators. The CGA's role in the complaints process is supervisory, relying on aggregated Complaint data to monitor operator compliance and support regulatory enforcement actions when necessary.

Nonetheless, Players retain the right to contact the CGA directly if they believe Aspro N.V. has engaged in regulatory non-compliance, malpractice, or breaches of licensing obligations. Aspro N.V. will not impose any restrictions on a Player's ability to report such concerns to the regulator.

4. Complaint Resolution Process

4.1 Prioritization of Complaints

All Complaints submitted to Aspro N.V. are recorded systematically and assessed to determine their priority. Complaints involving Responsible Gaming issues—such as failures to process self-exclusion requests or concerns about the targeting of vulnerable individuals—are prioritized for expedited handling due to their potential impact on Player welfare.

For Responsible Gaming Complaints, Aspro N.V. aims to issue a final response within five business days. In exceptional cases where additional time is required due to the complexity of the matter or external circumstances, this timeframe may be extended by up to two additional weeks.

All other categories of Complaints will be addressed in the order they are received, with a target resolution period of four weeks. For particularly complex cases or those requiring extensive evidence gathering, this period may be extended once by an additional four weeks, provided the Player is informed in advance.

4.2 Acknowledgment of Receipt

Upon receipt of a Complaint, Aspro N.V. will issue a formal written acknowledgment within the following timeframes:

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

The acknowledgment will include:

- Confirmation of receipt and the assignment of a unique reference number for tracking purposes.
- A clear outline of the steps involved in the investigation and resolution process.
- An estimated timeline for resolution, including information about possible extensions and the reasons they may be necessary.

4.3 Investigation and Resolution

Each Complaint will be investigated thoroughly and impartially. The investigation process will involve:

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

- Consulting with internal departments such as Customer Support, Compliance, and Technical Operations to ensure a comprehensive understanding of the matter.
- Requesting supplementary information or documentation from the Player if necessary to support the investigation.

The designated Complaint Handler will oversee the process, ensuring diligence and transparency throughout. At the conclusion of the investigation, the Player will receive:

- A detailed written explanation of the outcome, including supporting evidence where applicable.
- Clear instructions on how to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider if dissatisfied with the resolution.
- Contact details for the ADR provider(s) engaged by Aspro N.V.

4.4 Use of Artificial Intelligence (AI)

Aspro N.V. may utilize artificial intelligence tools to support certain aspects of complaint management, such as case triaging or identifying trends. However, human oversight remains mandatory in the following scenarios:

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

All AI-assisted resolutions will be reviewed by trained personnel to ensure fairness, accuracy, and compliance with regulatory requirements, safeguarding Player rights at every stage of the process.

5. Alternative Dispute Resolution (ADR)

5.1 Access to ADR Services

If a Player remains dissatisfied after completing Aspro N.V.'s internal complaints process, they are entitled to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider. ADR services are provided at no cost to the Player, and all related expenses are fully covered by Aspro N.V. in line with its regulatory obligations.

5.2 Binding Nature of ADR Decisions

Once an ADR process has been concluded and a final determination has been issued by the certified ADR provider, neither the Player nor Aspro N.V. may reopen the same matter with a different ADR entity. However, Players retain the right to seek legal remedies through the

appropriate judicial system where the ADR decision is not legally binding under applicable private law.

5.3 Safeguards Against Misuse of ADR Services

To protect the integrity of the ADR process, Aspro N.V. may, after consultation with legal counsel, implement reasonable parameters for referrals. These may include minimum claim thresholds or other criteria designed to prevent abuse of ADR services. Any such measures will be fair, proportionate, and fully compliant with applicable civil law, and will remain subject to oversight by the Curaçao Gaming Authority.

6. Record-Keeping and Reporting

6.1 Maintenance of Records

Aspro N.V. recognizes its obligation under Curaçao's regulatory framework to maintain comprehensive, accurate, and securely stored records of all Complaints submitted by Players. These records include, but are not limited to:

- Copies of all Complaint Submission Forms received, whether submitted electronically or in physical format.
- All correspondence between Players and the company's representatives during the complaint resolution process.
- Internal investigation reports and supporting documentation, including account histories, transaction logs, and technical reports where relevant.
- Records of any referrals or escalations to ADR providers and any legal proceedings initiated by either party.

These records are retained for a minimum 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. Aspro N.V. ensures its data retention practices remain fully compliant with Curaçao's regulatory requirements and applicable privacy legislation.

6.2 Reporting to the Regulatory Authority

In addition to maintaining internal records, Aspro N.V. submits detailed biannual reports to the Curaçao Gaming Authority (CGA). These reports, due on January 15th and June 15th of each calendar year, include:

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

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

The CGA retains the authority to request access to Complaint records at any time to fulfill its supervisory functions. Aspro N.V. will cooperate fully and provide the requested information promptly and in the format specified by the regulator.

7. Integration with Terms and Conditions

This Complaints Policy is an integral component of Aspro N.V.'s Terms and Conditions and is presented to all Players in a format that ensures clarity, prominence, and ease of access.

To promote transparency and accessibility, Aspro N.V. has adopted the following measures:

- The full Complaints Policy is published as a standalone document, available through a clearly visible link on the company's homepage, registration page, and within the Player account dashboard.
- A concise summary of the complaints procedure is incorporated within the Terms and Conditions, accompanied by direct hyperlinks to the complete Policy text for further reference.
- During the account registration process, Players are required to acknowledge and accept the Complaints Policy. This is facilitated through mechanisms such as a mandatory confirmation checkbox or pop-up notification to ensure informed consent prior to account creation.

The Terms and Conditions also provide:

- A detailed explanation of the complaint submission process, including applicable response and resolution timelines.
- Information on the Player's right to escalate unresolved Complaints to an independent Alternative Dispute Resolution (ADR) provider and to pursue further legal remedies where applicable under the law.
- A statement clarifying that although the Curaçao Gaming Authority (CGA) does not mediate individual disputes, it may be contacted by Players regarding concerns of regulatory non-compliance or breaches of licensing conditions.

8. Reasons for Submitting a Complaint

Players of Aspro N.V. have the right to submit Complaints concerning any aspect of their experience with the company's gaming and betting services. The following list, while not exhaustive, highlights common types of issues that may give rise to a Complaint:

- **Deposit Issues** – Delays, errors, or failures in processing deposits to Player accounts.
- **Withdrawal Issues** – Disputes over withdrawal requests, including delays, rejections, or partial payments.
- **Bonus Terms and Conditions** – Concerns about the fairness, clarity, or enforcement of promotional offers and bonus requirements.
- **Account Closures or Restrictions** – Allegations of unjustified account suspensions, closures, or imposed restrictions that limit Player access or use.
- **Game Fairness** – Issues related to software errors, technical malfunctions, or game outcomes perceived as unfair.
- **Responsible Gaming Concerns** – Complaints regarding failures to implement or honor self-exclusion requests, cooling-off periods, or other responsible gambling measures.
- **KYC and Verification Procedures** – Concerns about delays, difficulties, or perceived unfairness in identity verification and due diligence processes.
- **Data Protection and Privacy** – Issues related to the collection, handling, storage, or protection of Player personal data.
- **Technical or Software Malfunctions** – Problems affecting platform accessibility, functionality, or user interface performance.
- **Fraudulent Activities** – Allegations of fraudulent actions by third parties or the company itself.
- **Minors' Access** – Reports of underage individuals gaining unauthorized access to the gaming platform.
- **License or Regulatory Breaches** – Suspected violations of licensing conditions or other regulatory obligations imposed on Aspro N.V.

Players are encouraged to provide comprehensive details and relevant supporting evidence when submitting a Complaint. This helps to facilitate a prompt and thorough investigation of the matter.

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 Aspro N.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 affect 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 request further information may contact Aspro N.V. through any of the following channels:

- **Complaints:** info@asprobet.com; info@linebet.com; info@xparibet.com
- **Live Chat Support:** Available 24/7 via the company's website at <https://asprobet.com>; <https://linebet.com>; <https://xparibet.com>
- **Complaint Submission Form:** Accessible online at <https://asprobet.com>; <https://linebet.com>; <https://xparibet.com>
- **Alternative Dispute Resolution (ADR):** Information available at <https://asprobet.com>; <https://linebet.com>; <https://xparibet.com>
- **Curaçao Gaming Authority:** <https://www.gamingcontrolcuracao.org/>