

PLAYER COMPLAINTS POLICY

Red Lane B.V.

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1. POLICY OVERVIEW

Red Lane B.V. is committed to ensuring that all player complaints are handled fairly, transparently, efficiently, and in compliance with applicable regulatory requirements, including those of the Curaçao Gaming Authority (CGA).

The purpose of this policy is to establish a structured framework for receiving, assessing, investigating, escalating, and resolving player complaints in a consistent and auditable manner.

This policy applies to all customers and all gaming products offered by the Company, including Casino, Live Casino, Sportsbook, and related services.

2. DEFINITIONS

2.1 Player Interaction

Any communication between a customer and the Company, including but not limited to:

- Customer support chats
- Emails
- Account-related inquiries
- Payment-related communications
- Responsible gaming requests

2.2 Complaint

A complaint is any expression of dissatisfaction by a player regarding the Company's services, including:

- Account verification decisions
- Payment delays or failures
- Game outcomes or technical issues
- Bonus or promotional disputes
- Responsible gaming actions
- Customer support conduct

2.3 Dispute

A dispute refers to a complaint that:

- Cannot be resolved at first-level support; or
- Requires investigation by Compliance, Risk, or Senior Management; or
- Involves financial, regulatory, or AML-related concerns

3. COMPLAINT SUBMISSION PROCESS

Players may submit complaints via:

- Live Chat Support
- Email Support
- Website Contact Form

All complaints are recorded in the internal complaint management system.

3.1 Complaint Window

Players may submit complaints:

- Within a reasonable timeframe following the incident;
- Normally within 30 calendar days of the issue occurrence;
- Exceptions may be considered where justified (e.g. delayed discovery of issue)

3.2 Stages / Escalation of Complaint Resolution

Complaints are handled in a structured escalation model:

Stage 1 – Customer Support

- Initial assessment
- Basic resolution attempt
- Logging and classification

Stage 2 – Compliance Review

- Independent review by Compliance Officer
- Reassessment of evidence
- Fairness and regulatory evaluation

Stage 3 – Senior Management Review

- Final internal decision-making level
- Binding internal resolution outcome

3.3 Role of the CGA

Where applicable, the Curaçao Gaming Authority (CGA):

- May be informed of unresolved disputes
- May request complaint records or investigation files
- Acts as the regulatory oversight body for escalation cases

Players may be informed of their right to escalate to the regulator where internal resolution is not satisfactory.

4. COMPLAINT RESOLUTION PROCESS

All complaints are handled in accordance with principles of fairness, transparency, and timeliness.

4.1 Timeline: Responsible Gaming Complaints

Responsible gaming-related complaints are treated as high priority.

- Acknowledgement: within 24 hours
- Initial resolution: within 3–5 business days
- Complex cases: up to 10 business days

4.2 Timeline: All Other Complaint Types

For standard complaints:

- Acknowledgement: within 24 hours
- Resolution target: within 7 business days
- Complex cases: up to 14 business days

4.3 Response and Resolution

The Company ensures that:

- All complaints are investigated thoroughly
- Decisions are evidence-based
- Customers receive a clear written explanation
- Outcomes are fair, consistent, and documented

Possible outcomes include:

- Complaint upheld
- Complaint rejected
- Partial resolution / goodwill compensation (if applicable)
- Account correction or adjustment

4.4 Artificial Intelligence (AI)

Where AI systems are used in complaint handling:

- AI is used only as a support tool
- Final decisions are made by human staff
- AI outputs are reviewed for accuracy and fairness
- No automated final rejection is made without human oversight

5. ALTERNATIVE DISPUTE RESOLUTION

If a complaint cannot be resolved internally, the player may be directed to an external dispute resolution mechanism, where applicable.

The Company will:

- Provide full complaint history upon request
- Cooperate with external review bodies
- Comply with regulatory instructions from CGA

6. RECORD-KEEPING AND REPORTING

The Company maintains comprehensive records of all complaints, including:

- Complaint details and classification
- Investigation notes and evidence
- Communication logs
- Resolution outcomes
- Escalation steps

Records are retained in accordance with AML/CFT and regulatory requirements and are available for inspection by competent authorities.

7. TERMS AND CONDITIONS

All complaints are assessed in accordance with:

- The Company's Terms and Conditions
- Bonus and promotional rules
- Game provider rules
- Applicable regulatory obligations

In case of conflict, regulatory requirements and compliance obligations take precedence.

8. REASONS FOR COMPLAINT

Common categories include:

- Payment processing delays or failures
- Account verification issues
- Bonus disputes
- Game malfunction or technical error
- Customer service dissatisfaction
- Responsible gaming restrictions or limits
- Suspicious activity or fraud-related actions

9. TRANSITION DEADLINE

This policy applies immediately upon implementation and replaces any previous internal complaint handling procedures.

The Company ensures all operational departments are trained and aligned with this policy within the transition period.

APPROVAL

Approved by:
Kurason Trust Curaçao N.V.
Managing Director: Mr. Jonathan Heymans

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