

COMPLAINTS POLICY

ORANGE ENTERTAINMENT B.V.

I. INTRODUCTION

Orange Entertainment B.V. ("the Company") is committed to providing all players with a fair, transparent, and efficient complaints and dispute resolution process.

This Complaints Policy has been developed in accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK") and the requirements established by the Curaçao Gaming Authority ("CGA").

The purpose of this Policy is to ensure that every player has access to a clear, impartial, and effective mechanism for resolving complaints free of charge, including access to independent Alternative Dispute Resolution ("ADR") services. The Company handles all complaints in good faith, with the aim of reaching equitable outcomes based on evidence, applicable law, and its Terms and Conditions.

This Policy is publicly available on the Company's website and forms an integral part of its Terms and Conditions.

II. SUBMITTING A COMPLAINT

Players may raise a complaint free of charge within six (6) months from the date of the disputed incident or bet settlement.

Players may initially contact Customer Support via email or live chat to seek clarification or informal resolution. If the issue remains unresolved, the player should proceed to submit the official Complaint Submission Form to initiate the formal process.

Complaints must be submitted in writing using the Company's **Complaint Submission Form**, which is available both online and as a downloadable document. The form requires the player's identifying details, the date of the complaint and event in question, a clear description of the issue, and any supporting documentation.

Only the registered account holder may file a complaint.

The Complaint Submission Form is available in English and in the primary language of the domain through which the player accessed the gaming services.

III. VALID GROUNDS FOR COMPLAINT

Players have the right to raise a complaint concerning any aspect of their interaction with the Company, including but not limited to:

- Deposit or withdrawal issues;
- Bonus or promotional terms;
- Account closures or restrictions;
- Alleged errors or fairness in game outcomes;
- Implementation of responsible gaming measures;
- Handling of player balances or transactions;

- KYC and verification processes;
- Data protection or privacy issues;
- Software or technical malfunctions;
- Anti-money laundering procedures;
- Access by minors;
- Fraudulent behaviour or practices;
- Breach of licensing obligations or regulations;
- Unfair contractual terms or misleading information.

IV. COMPLAINT HANDLING AND RESPONSE TIMEFRAMES

Upon receiving a complaint, the Company confirms its receipt in writing and informs the player of the process and indicative timeframes for resolution.

Responsible Gaming Complaints

Complaints that concern Responsible Gaming — such as self-exclusion, cooling-off requests, or potential targeting of vulnerable players — are treated with priority due to their potential impact on player well-being.

These complaints will be acknowledged within **two (2) business days** and resolved within **five (5) business days** where possible.

If further time is reasonably required to complete the investigation, the player will be informed of the delay, which shall not exceed **two (2) weeks**, unless extended by an additional two (2) weeks due to a delay in player cooperation.

All Other Complaints

All other complaint types are acknowledged within **seven (7) calendar days** of receipt. The Company endeavours to issue a final response within **four (4) weeks**.

Where a complaint is complex or additional documentation is required, the Company may extend the resolution period once, by up to **four (4) additional weeks**, with prior written notice to the player.

Throughout the process, the player will be kept informed of progress and any actions required to facilitate a timely resolution.

V. RESOLUTION AND ESCALATION

Once a full review of the complaint has been conducted, the player will receive a final written response.

The response will clearly outline:

- The outcome of the investigation and the reasoning behind the decision;

- Any remedial action to be taken, where applicable; or
- The reasons why the complaint could not be processed or upheld (for instance, due to insufficient information or expiry of the submission period).

If the player is dissatisfied with the final outcome, they will be informed of their right to escalate the matter to an independent **Alternative Dispute Resolution (ADR)** provider.

All ADR services are provided **free of charge to the player**. The Company covers all associated ADR costs.

Once the ADR process concludes, its outcome is final and cannot be reopened with a different ADR provider. If the player withdraws from the ADR process before completion, the case is deemed closed and cannot be resubmitted at a later date.

The player always retains the right to seek legal recourse independently of the ADR procedure, unless otherwise provided under the specific terms of the ADR process.

VI. ROLE OF THE CURAÇAO GAMING AUTHORITY

The Curaçao Gaming Authority (CGA) supervises the compliance of licensed operators with the applicable legal and regulatory framework.

However, the CGA does **not** intervene or make determinations in individual player disputes regarding gaming transactions.

The CGA may, however, be contacted directly by players who wish to report:

- Alleged misconduct or breach of licensing conditions by the operator;
- Malpractice or unethical behaviour; or
- Matters related to regulatory non-compliance or whistleblowing.

While the CGA does not adjudicate individual complaints, it may use the information provided to support supervisory or enforcement action if necessary.

VII. RECORD-KEEPING AND REGULATORY REPORTING

The Company maintains accurate and complete records of all complaints, correspondence, evidence, and outcomes.

Complaint records are retained for a period of **five (5) years** or as otherwise required by data protection and limitation laws.

Twice per year, on **January 15th** and **June 15th**, the Company submits a Complaint Report to the CGA, containing:

- Total number of complaints received;
- Number of complaints resolved (upheld and rejected);

- Pending or unresolved complaints;
- Complaints by category;
- Complaints escalated to ADR;
- Complaints resulting in legal action.

VIII. ARTIFICIAL INTELLIGENCE IN COMPLAINT MANAGEMENT

The Company may employ Artificial Intelligence (“AI”) tools to assist in identifying and categorizing complaints, provided such use does not compromise fairness or transparency.

Complaints involving Responsible Gaming or complex factual disputes will always be handled directly by qualified human personnel.

AI-assisted complaint handling is subject to ongoing monitoring to ensure accuracy, proportionality, and consistency across similar cases.

IX. GOVERNANCE AND REVIEW

This Policy is reviewed at least annually, or sooner if required by regulatory changes or guidance issued by the CGA.

X. CONTACT FOR COMPLAINTS:

✉ complaints@lemon.casino

Independent ADR Provider: The Company shall enter into an agreement with a CGA-certified Alternative Dispute Resolution provider once the list of certified entities is published by the CGA. Until such certification is announced, details remain to be confirmed.

Regulator: Curaçao Gaming Authority – complaints@cga.cw.