

Player Compliance Policy

Effective Date: June 2025

Last Reviewed:

1. INTRODUCTION

This Player Compliance Policy (PCP) constitutes a binding internal regulatory instrument that governs how Peak Progress Partners N.V. ("Operator") manages, investigates, resolves, and escalates complaints submitted by players who engage with its online gambling services.

All websites operated by the Operator, including but not limited to <https://ge.casino/>, <https://goldeneggs.casino/> (collectively referred to as the "Website" or "Platform") are owned and operated by Peak Progress Partners N.V., a company registered in accordance with Curacao Law, registration No.167287, Address: Trias Building, Hanchi Snoa 19, Willemstad, Curaçao.

This PCP has been developed in accordance with The National Ordinance on Games of Chance (Landsverordening op de Kansspelen (LOK)), Curacao Gaming Authority (CGA) requirements (Responsible Gaming Policy for Licensed Operators), AML/CFT laws of Curacao.

The objective of this PCP is to ensure that all complaints are addressed promptly, fairly, and transparently, and that no Player is denied the right to express dissatisfaction regarding the services, products, operational decisions, or conduct of the Operator. It also codifies the structure of internal procedures that govern how complaints are registered, acknowledged, assessed, responded to, and, where appropriate, escalated to Alternative Dispute Resolution (ADR) or relevant regulatory channels.

2. DEFINITIONS

For the purposes of this PSP, the following definitions shall apply:

Player – any natural person who has completed the registration and KYC verification process and maintains an active or suspended account with the Operator for participating in gambling services.

Player Interaction – any written communication initiated by a Player and directed to the operator's customer support team. This includes general enquiries, feedback, or requests for information, assistance, or clarification.

Complaint – a written expression of dissatisfaction by a Player relating to the operator's services, decisions, terms, or conduct, which indicates the player is unhappy and expects a response or resolution.

Dispute – a Complaint that has not been resolved to the player's satisfaction through the internal complaints process and has been escalated, either within the organisation or to an independent third party (Alternative Dispute Resolution or court of law).

Final Response – the written communication issued by the Operator after a Complaint has been resolved or a position is taken.

Alternative Dispute Resolution (ADR) – a third-party body that is independent, impartial, and approved or recognized by the CGA to adjudicate Disputes between Players and Operator outside the formal judicial process.

3. COMPLIANT SUBMISSION

Eligibility and Time Limits

Players are entitled to submit a Complaint regarding any service, transaction, bonus, promotion, or operational matter within six (6) calendar months from the date of the relevant event or incident. Complaints received after this period may be considered at the Operator's discretion if exceptional circumstances apply.

Submission Channels

Complaints must be submitted through one of the following secure and accessible channels:

- A written email to the designated complaints address published on the Website;
- Live Chat, followed by written summary or confirmation if resolution is not immediate.

All Complaints must include:

- i. The Player's full name, username, place of residence and registered email;
- ii. A summary of the facts and nature of the Complaint;
- iii. Supporting documentation (if available);
- iv. Date and reference of the affected transaction or incident.

Acknowledgement and Timelines

The Operator shall acknowledge receipt of any Complaint within two (2) business days and shall issue a Final Response within four (4) weeks from the date of acknowledgment. In exceptional cases involving complex factual or legal issues, the resolution period may be extended to a maximum of eight (8) weeks, provided the Player is notified in writing of the extension and underlying reasons.

4. COMPLAINT PROCESSING AND RESOLUTION

All Complaints submitted to the Operator are processed in a manner that ensures fairness, impartiality, and compliance with applicable regulatory obligations.

The internal procedure includes the following steps:

Registration

Upon receipt, every Complaint is assigned a unique case reference number and entered into the secure complaint tracking system.

Categorization

The Complaint is classified by type (e.g., payment, bonus, RG, KYC, technical malfunction).

Investigation

Designated and trained staff conduct an objective and timely investigation of the facts, consulting relevant teams or records.

Escalation

If the Complaint involves responsible gaming concerns, potential player harm, or unresolved regulatory risks, the Responsible Gaming Officer (RGO)/Compliance Office is notified immediately. Such Complaints are reviewed by the Operator within five (5) business days.

Decision

A written Final Response is prepared and sent to the Player. This includes an explanation of findings, outcomes, and, where applicable, a proposed remedy.

All correspondence and decision-making logs preserves for audit purposes. The Operator ensures that no Complaint is arbitrarily dismissed or ignored.

5. ADR AND ESCALATION

If a Player is dissatisfied with the Operator's final determination or the matter remains unresolved beyond the applicable response period, the Player may escalate the Dispute to an ADR provider authorized by the CGA.

The following conditions apply:

No Cost to Player

ADR procedures shall be provided entirely free of charge to the Player.

Single Use Clause

The Player may only submit each Dispute once to an ADR provider. Repeat or parallel submissions to other ADRs are not permitted.

Binding Outcome

The Operator agrees to be bound by the final outcome of the ADR process and shall implement any decision promptly.

Facilitation

The Operator will provide the Player with clear instructions on how to access ADR and will supply the case file and supporting materials directly to the ADR provider upon request.

A list of authorized ADR providers can be obtained by contacting the Operator or through the CGA website.

6. CGA OVERSIGHT AND REGULATORY INTERFACE

While the CGA does not mediate or adjudicate Complaints, it retains regulatory oversight over the Operator's handling of Player disputes.

The Operator is guided by the following provisions:

- Players retain the right to contact the CGA directly if they have reason to believe the Operator has breached its license conditions, failed to follow complaint procedures, or engaged in conduct inconsistent with regulatory obligations;

- The Operator is not obstruct, limit, or discourage any such contact and shall provide Players with a direct link to CGA's contact page;
- Where the CGA requests records, summaries, or access to case files in the course of supervision or audit, the Operator is comply promptly and in full.

The Operator considers all CGA inquiries regarding Complaints or compliance with this PCP as regulatory in nature and reports significant deviations or systemic failures without undue delay.

7. RECORDKEEPING AND REPORTING

The Operator maintains a centralized, encrypted complaints register that records each case from submission to resolution, including:

- Date of receipt and acknowledgment;
- Nature of the Complaint and categorization (e.g., payment, bonus, RG, KYC, technical malfunction);
- Timeline and internal handler(s);
- All correspondence and documented decisions;
- ADR outcome (where applicable).

The Operator retains all complaint-related records for a minimum of five (5) years or for the statutory limitation period, whichever is longer.

Additionally, the Operator submits biannual complaint reports to CGA on January 15 and June 15, detailing:

- i. total number of Complaints made;
- ii. total number of settled Complaints (upheld and rejected);
- iii. number of pending or unresolved Complaints;
- iv. number of Complaints by category;
- v. number referred to ADR;
- vi. number and detail of Complaints for which a Player has taken legal action.

8. CATEGORIES OF COMPLAINTS

The Operator recognizes and accepts the legitimacy of Complaints covering, but not limited to, the following areas:

- Delays in deposit or withdrawal processing;
- Alleged inconsistencies in bonus terms and conditions, wagering requirements, or promotional mechanics;
- Perceived game unfairness;
- Technical or Software faults;
- Disputes regarding self-exclusion, cooling off or RG controls not functioning as expected;
- Failure or delay in completing KYC/AML verification steps (including issues with minors, fraudulent games and practices);
- Data Protection issues;
- Account lockouts or suspension decisions;
- Treatment of Player balances;
- Breach of published Terms and Conditions;

- License or regulation issues;
- Any misconduct, unresponsiveness, or negligence on the part of Operator staff.

Complaints falling outside this scope may still be reviewed at the Operator's discretion if Player trust or transparency is at stake.

9. POLICY REVIEW AND AMENDMENTS

This PCP shall be reviewed and revised:

- at least once per calendar year;
- immediately following any regulatory directive, legal change, system-level incident, or audit recommendation issued by the CGA or internal compliance authority;
- an ADR body or legal authority identifies systemic deficiencies.

Where updates materially affect Player rights or access to redress, a summary of amendments shall be made publicly available on the Website.

10. CONTACT AND SUPPORT

For any questions related to this PCP, please contact:

Email: compliance@goldeneggs.casino, support@goldeneggs.casino

APPROVED BY:

Name:

Position:

Date:

Signature: