

Internal Complaint Handling Procedures

Effective Date: July 31, 2025

License Holder: Palau Holdings N.V.

License Number: OGL/2024/197/048

Jurisdiction: Curaçao

1. Introduction and Objective

This internal procedure document outlines how Palau Holdings N.V. staff are to receive, handle, and resolve player complaints in compliance with Curaçao Gaming Authority (CGA) regulations. All team members involved in player support, compliance, and dispute resolution must adhere to these procedures.

2. Scope of Complaints

The following complaint categories may be raised by players:

- Login or account access issues
- Deposits, withdrawals, or payment delays
- Game fairness or technical malfunctions
- Bonus or promotional disputes
- Responsible gaming tools or enforcement
- Any breach of Terms & Conditions or related obligations

3. Initial Complaint Handling

Players are encouraged to first contact Live Chat or email support (support@bingofest.com or support@eddybetcasino.com). Support agents must:

- Record full details in the CRM
- Attempt resolution during first contact
- Escalate unresolved issues to the Compliance Team within 24 hours

4. Formal Complaint Submission Process

If the player wishes to escalate, they must submit the Formal Complaint Submission downloadable Forms (for [BingoFest](#) and [EddyBetCasino](#)) to playeraccounts@bingofest.com or playeraccounts@eddybetcasino.com. The form must include all required fields.

Compliance staff must confirm receipt within 2 business days and log the complaint in the master register.

5. Response Timeframes

Responsible Gaming Complaints:

- Acknowledge within 2 business days
- Aim to resolve within 5 business days
- Max extension: 4 weeks (due to missing documentation)

Other Complaints:

- Acknowledge within 7 calendar days
- Aim to resolve within 4 weeks
- Max extension: 8 weeks total with written justification

6. ADR and Regulatory Escalation

If a player is not satisfied, they must be informed of the ADR process.

- ADR is free and independent
- Compliance must update the policy and notify players once an ADR provider is designated

■ At this time, the Curaçao Gaming Authority (CGA) has not yet published the list of certified ADR providers. As soon as they do, we will update this policy with contact details and instructions for submitting a complaint to the designated ADR.

For regulatory breaches, players may contact the CGA directly via their formal complaint form.

7. Recordkeeping & Reporting

All complaints must be documented and stored securely for a minimum of five (5) years.

- CRM ticket
- Complaint register (internal log)
- Email trails and attachments

8. Abuse and Bad Faith Complaints

Complaints may be closed without action if they are:

- Abusive or threatening
- Repetitive without new evidence
- Vague or lacking sufficient detail

9. Staff Responsibilities and Training

All relevant staff must receive annual training on handling complaints, including updates to regulatory standards. The Compliance Team is responsible for:

- Ensuring adherence to timelines
- Maintaining documentation
- Updating procedures as required by CGA

10. Compliance Team Duties

The Compliance Team is responsible for ensuring that all complaints are managed in accordance with regulatory requirements and internal standards. Their duties include:

- Monitoring complaint trends and recurring issues
- Ensuring timely responses and follow-ups
- Maintaining the complaint register and evidence repository
- Implementing updates based on CGA guidance

- Leading investigations and drafting final resolutions