

Blue Pepper B.V

Complaints Management Policy

(Curacao)

Document Information

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Approval

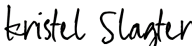
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Policy Overview

This Complaints Policy outlines the framework for managing player complaints and disputes, ensuring a transparent, fair, and efficient process in alignment with the Curacao Gaming Authority (CGA) requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”) and the CGA Player Complaints Policy v1.1.

Blue Pepper B.V. remains responsible for ensuring compliance with all relevant laws and regulations as published by the CGA.

Complaint process

A Complaint is 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. Player contact pertaining to general enquiries, feedback, or requests for information, assistance, or clarification do not constitute a complaint.

According to CGA reporting requirements (Clause 6 of the CGA Complaints Policy v.1.1.) a complaint is when a **Complaint Submission Form** has been submitted by the player to us and/or a complaint has been escalated to the Alternative Dispute Resolution provider (“ADR”) who is an independent third party, approved by the CGA.

Client complaints are received through Complaint Submission Forms which have been submitted to Blue Pepper B.V. directly from the client or externally through our CGA approved ADR.

In the case that an internally received complaint has not been resolved to the player’s satisfaction, then the player may escalate the complaint externally to the ADR.

Complaint Submission Process

Complaints can only be made by the registered player. A complaint may be lodged free of charge at any time up to 6 months of the settlement of the bet or the incident about which they are making a complaint.

To ensure that players can submit complaints in a clear and accessible manner, an official Complaint Submission Form is available in the T&Cs Complaints section on the website which details how the submission should be sent.

The player has a right to make a complaint relating to (but not limited to):

- Deposit issues
- Withdrawal issues
- Bonus terms and conditions
- Unfair terms and conditions
- Account closures or restrictions
- Alleged errors or unfairness in game outcomes
- Responsible gaming issues
- Treatment of player balances
- KYC and Verification
- Data Protection
- Technical or Software issues
- AML concerns
- Issues with minors
- Fraudulent games
- Fraudulent practices
- License or regulation

Required Information

The Complaint Submission Form must include, at a minimum, the following fields:

- Full name, address, and place of residence of the complainant
- Player account number
- Date of the complaint and the date of the event being disputed
- Description of the issue

The Complaint Submission Form is available in both English, and the language used on the domain accessed by the player.

In the case that further information is required, supporting documents may be requested from the player to assist in resolving the complaint, ensuring that the request is relevant and proportionate to the complaint at hand.

Alternative Dispute Resolution (ADR)

Should players who complained internally, not be happy with the resolution received, they will also have access to contacting our selected CGA approved Alternative Dispute Resolution (ADR), free of charge in accordance with the requirements set out in Clause 5 of the LOK.

If a complaint escalated to an ADR has been completed, neither the player nor the operator, can make use of a different ADR entity to revisit the same complaint. While, in any case that the player drops out of an ADR process that has already begun, the player does not have the right to resurface the dispute in the future.

Submissions and liaison with the ADR is the responsibility of the Junior Compliance Manager. In her absence, the Head of Compliance shall cover the reporting requirements.

Resolution Process

Timeline

Responsible Gaming Complaints

Responsible Gaming complaints are prioritised due to potential impacts on player's well-being, and such complaints are categorised under responsible gaming, especially when it relates to vulnerable players, and/or self-exclusion and/or cooling-off periods.

Such cases must normally be resolved within 5 business days, however, within 2 days of receiving the complaint, the player should receive:

- Confirmation receipt of the complaint in writing,
- An explanation on how the complaint will be processed, and
- The average timeline for resolution of such complaints.

If a resolution may be delayed, the player must be informed, and this cannot exceed 2 weeks. The resolution may only be extended (no more than a further 2 weeks) if the delay is due to a lack of or a slow response from the player.

All Other Complaints

General complaints must be assessed and responded within 4 weeks. If necessary, due to complexity or lack of information, this period may be extended once by an additional 4 weeks with prior written notice to the player.

Within one week of receiving the complaint, the player must receive:

- Confirmation receipt of the complaint in writing,
- An explanation of how the complaint will be processed, and
- The average timeline for resolution of such complaints.

Record-keeping and Reporting

Twice a year, on the 15th of January and the 15th of July, Blue Pepper must submit a report to the CGA disclosing the following information to the regulator:

- Total number of formal complaints made (i.e. by Complaint Submission Form) ;
- Total number of formal complaints closed – settled/rejected;
- Number of pending/unresolved formal complaints;
- Number of formal complaints by category;
- Number of formal complaints referred to the ADR, including the outcomes of each; and
- Number and detail of formal complaints where a client may have taken legal action.

Records of unresolved complaints and/or complaints that have been escalated to ADR or legal proceedings will be kept for the lesser of five (5) years or the relevant time stipulated by data protection, statute of limitations, or other relevant laws or guidelines.

The CS team ensures that such complaints and/or Complaint Submission Forms received are added to the Compliance queue on Salesforce. However, the data compiled to address the complaint depends on which team the complaint relates to. Based on the nature of the complaint, Compliance will reach out to the relevant team to investigate the matter and provide the necessary data and information required.

Complaint submission forms and related information will be stored in a designated Compliance SharePoint folder under the client's username. This will facilitate reference and support in the event of ADR involvement, assist with the collation of bi-annual CGA complaint data reporting, and in the event of any other CGA request.

Submissions to the CGA are the responsibility of the Junior Compliance Manager. In her absence, the Head of Compliance shall cover the reporting requirements.

Further information on record keeping and reporting can be found within the CW Reporting Policy, section 3.

Terms and Conditions

In accordance with the CGA's Complaints Policy, our complaints procedure is clearly outlined in our Terms and Conditions (T&Cs). We ensure players have straightforward access to customer support, including clear instructions on how to contact us regarding any concerns.

Information provided within the T&Cs will include at a minimum:

1. Links to customer service and information on how to contact the operator.
2. Detail of information required for a player to make a complaint and links to the official Complaint Submission Form.
3. Timelines for responses and resolution.
4. Player rights to complain including explicit rights to ADR services and regulatory escalation.
5. An explanation of the potential consequences of the relevant ADR entity's decision, and the way this will affect the player's right to further legal and judicial recourse.
6. Details of the ADR process and player rights.
7. Contact information for the ADR provider.
8. Clear information that the CGA does not mediate in individual disputes, but if the player feels the operator is in breach of regulations that the player may contact the CGA.