

Blue Pepper B.V. Responsible Gambling Policy Curacao

Version 1.2

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Document Information

Subject	Responsible Gambling Policy
Purpose	To set out the Blue Pepper B.V. stance on Responsible Gambling
Document Owner	Compliance Team
Review	Annually or as early as required
Involvements	All departments involved in or connected to Responsible Gambling.
Approval	Executive Management
Document Classification	Internal Use

Version Control

Date	Version	Title	Description
21.10.2024.	1.0	Compliance Team	Document Creation
22.05.2025.	1.1	Compliance Team	Further policy updated in alignment with the newly introduced CGA Responsible Gambling Policy.
01.10.2025	1.2	Compliance Team	The policy has been updated to ensure that the latest CGA RG policy updates have been reflected – the Self-exclusion period of 1 year and timeout provisions have been updated to remove 14 days and 180 days. Stake limits have been removed as they were underutilised by

			customers when compared to other mandatory RG tools.
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Approval

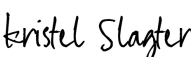
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Introduction

The brand reputation and social responsibility of Blue Pepper are intertwined with its core value of integrity, which emphasizes aiding customers in preventing and dealing with problem gambling issues effectively. Recognizing the significance of Responsible Gambling (RG) for our players' well-being and our business's longevity, we are acutely aware of the potential hazards of gambling. We are dedicated to helping our customers manage these risks.

We view this policy and any supplementary materials as dynamic instruments, subject to regular review and modifications. This ensures alignment with shifts in regulatory frameworks, incorporation of new guidance, and internal changes related to our systems, processes, organizational structure, among others.

1.1 Purpose of the Responsible Gambling Policy

The purpose of this internal policy is to provide direct and indirect employees, who work with Blue Pepper B.V, guidance on our obligations to ensure that our customers gamble responsibly and how we as a business identify customers who are at risk at the earliest possible opportunity.

Employee Education

2.1 Employee Training & Records

As part of ongoing training and education of all employees, the Compliance team assigns general Responsible Gambling training for all current and new employees. This training is presented interactively annually at the iGaming School portal hosted by the iGaming Academy platform and a record is maintained of who has completed the training. All new starters are assigned the RG training within their first week as part of the company's onboarding process.

Additionally, the Compliance Team conducts targeted, as-needed operational training for all customer-facing staff. This training can be conducted face-to-face or via remote methods, providing in-depth instruction on the practical implementation of all Responsible Gambling policies and related procedures. The training is designed to equip staff with the skills to identify risk indicators, evaluate customer risk levels, handle customer interactions effectively, and escalate issues for the Responsible Gambling Manager's evaluation.

An internal record of these ad-hoc training sessions is maintained in the internal Compliance folder.

On-site Player Protection Measures

3.1 Age verification

At Blue Pepper, we have a zero-tolerance stance when it comes to underage gambling.

The Company employs the following measures to deter underage individuals from creating an account on the websites:

- An 18+ badge/ warning message is visible at all times on the websites;
- Customers must affirm that they are of the age 18 and older during the registration process and must indicate their date of birth. The registration is denied if the individual uses a date of birth which would indicate that he/she is underage.
- A warning that customers must be over the age of 18 to create an account in the company's website Terms and Conditions which are to be read and accepted at the registration stage.
- The requesting of KYC (*Know Your Client*) documentation, namely ID and Proof of Address documentation upon the customer due diligence stage.

If it is determined that an underage customer has managed to register, the account is immediately closed as such.

All team members interacting with customers should remain vigilant for indications of underage use. Such indicators may include:

- Signs that KYC documents have been falsified/ tampered with.
- A voice that sounds youthful, suggesting the customer could be underage.
- Remarks from the customer that give rise to concerns about their age.
- An email address that may hint at the year of birth, which does not match the date of birth indicated upon registration potentially revealing underage status.
- Claims from third parties suggesting that the account owner is underage.

The Company shall revisit its under-age practices and policies to align with the applicable regulatory requirements as they enter into force.

3.2 Responsible Advertising, Bonusing and Promotions

3.2.1 Self-exclusion

When a customer opts for an account closure as an exclusion measure or puts temporary product exclusions, the system automatically disables promotional marketing. This critical step ensures that no promotional material or incentives are forwarded to those customers, thus avoiding the possibility of reigniting their interest in gambling activities.

3.2.2 General Requirements for Advertising:

In line with the applicable requirements for Advertising, the company ensures that its promotional content is not directed at persons under 18 and is not harmful, indecent, or offensive to vulnerable persons and persons at risk of developing gambling-related harm. Further guidance on compliant advertising content can be found within the *Guidebook for Compliant Advertising Practices*.

All marketing and promotions available or sent to customers include RG messages.

Furthermore, the company may revoke the customer's participation in a promotional offer available on-site if the account has been flagged for Responsible Gambling concerns, even if the customer has begun contributing to the promotional offer.

The Company shall adjust its guidance around responsible advertising of gambling related products and services to ensure that information remains current and aligned with applicable regulatory requirements, and they come into effect.

3.3 Responsible Gambling Information Resources Available On-Site

All licensed websites operated by the Company include the following Responsible Gambling (RG) information resources:

- A dedicated chapter on Responsible Gambling within the General Terms and Conditions, provides reference to <https://gamblingtherapy.org/> and www.gamcare.org.uk.
- A footer link directing users to a dedicated RG information page, which provides key resources and guidance.
- Reference to the FMA is located on the footer, which is the customer-oriented knowledge center in Curaçao that offers prevention, education and treatment with a proactive and professional approach.

It is important to also include notice that no credit is offered to customers for the purpose of wagering.

The RG-related page content shall be reviewed and updated periodically to ensure that information remains current and aligned with applicable regulatory requirements as they come into effect.

3.4 Responsible Gambling Tools Available On-Site

The Company offers a variety of on-site Responsible Gambling Tools in order to assist our customers to exercise greater control over their gambling, which can be found under the user account menu.

Deposit limit:

We provide customers with the option to set a deposit limit on their account to help them manage their spending and promote responsible gambling. By setting a deposit limit, customers can control how much money they add to their account within a chosen time frame, reducing the risk of overspending. This feature is easily accessible in the account settings and can be adjusted at any time, with increases subject to a 24-hour cooling-off period to ensure thoughtful decision-making.

Product Block (i.e., Disable a product vertical):

We offer an on-site Product Blocking option for our customers, who can choose to block any product vertical we offer (i.e., Sports, Virtual Sports, Casino, Live Casino). Customers can choose a time frame of:

- 1 day,
- 2 days,
- 7 days,
- 14 days,
- 30 days,
- 90 days, or
- 180 days.

Should a customer request to remove the product block, a 24-hour cooling off period is required from the time of request.

Temporary Account Suspension (i.e Time-out): Customers who wish to take a temporary break from gambling, may do so by selecting the offered time-out facility. The customers may choose between a period of:

- 1 day,
- 7 days,
- 30 days, or
- 90 days

disabling gameplay during this time. Customers cannot remove this setting until the selected time has elapsed. Once this setting has elapsed, this limit is removed automatically by the system.

Self-exclusion:

As part of our commitment to responsible gambling, we offer customers the option to **self-exclude** from their account for a period of 1 year. Self-exclusion allows individuals to take a break from gambling by restricting access to their account. During this time, customers will not be able to log in, deposit, or place bets.

Once the self-exclusion request is confirmed by the customer, they shall receive an email confirming the self-exclusion request, providing further details on the time and date of the block, information on the permanent nature of the exclusion request, as well as external help links for Responsible Gambling.

Self-exclusion can only be removed once the 1-year time-period has elapsed, following positive communication from the client to have the setting removed. No self-exclusions can be uplifted before the time-period has elapsed.

In addition to the above, the company warns the customer not to proceed to attempt to register a new account, as all such attempts will be monitored, and duplicate accounts shall be blocked accordingly. Furthermore, to further avoid the possibility of creating a duplicate account, the company's websites are designed to capture the following data upon registration to prevent customers from creating duplicate accounts:

- Matches in IP address,
- Matches in Device,
- Matches in email,
- Matches in phone number.

If any of the aforementioned factors are present the website does not allow the customer to finalise the registration process.

Furthermore, upon a self-exclusion request, our Customer Support department ensures that all further communication methods are disabled. This removal of all communication methods is key to ensuring that no promotional offers or bonuses are sent to these self-excluded customer accounts, preventing further enticement or interest in gambling.

When a customer self-excludes under one brand, this exclusion must also be applied across any other CW registered brands they may hold. These requests are actioned by the P+F team, who will ensure the exclusion is correctly applied across the other brands. For customers, this means that once they self-exclude on one CW-licensed brand, they will not be able to access any other brand under the same license during the exclusion period.

This cross-brand restriction does not apply to time-outs.

Furthermore, the RG team may elect to apply a forced account suspension/ exclusion depending on the nature and severity of the case/ risks present.

The RG tools available on-site shall be reviewed and updated periodically to ensure that the RG tool functionality and their duration timelines remain aligned with applicable regulatory requirements as they come into effect.

3.5 Customer Behaviour Tracking

In accordance with the Curacao Gaming Authority's Responsible Gambling policy, the Company will implement an appropriate tracking model to ensure ongoing compliance with relevant regulatory requirements as they come into effect.

3.6 Concerning Statements

A lot can be determined by past customer communication in their emails & chats to detect signs of problem gambling behaviour. It's crucial to focus on the underlying sentiment rather than the exact wording of concerning statements. This is because customers might convey their issues in varied ways, sometimes alluding to problems without directly stating them.

Listed below are examples of what may be deemed as concerning statements indicating that the customer is displaying potential worrying behaviour:

- The customer mentions that he/she is participating in gambling to aid depression, or the customer mentions that they are depressed, upset or stressed.
- Threats of self-harm ([for more information on how to handle self-harm threats, please consult the Self Harm Threat Management Policy](#)).
- Frequent and aggressive complaints over the fairness of games, mentioning that the games are rigged and accusations of fraud.
- Customer admits or indicates that they have a gambling addiction, they are addicted, they are chasing their losses, they are excessively borrowing money to substantiate their gambling behaviour.
- The customer mentions debt, missed payments, fear over their financial circumstances;
- The customer mentions that they are gambling to pay for bills, rent, food, etc.,
- The customer mentions that gambling has attributed to cause a rift with friends and family;
- Family members making contact with the company due to concerns of problematic gambling;
- The customer has indicated that they gamble under the influence or dependency of drugs/ alcohol;
- The customer points to poor physical or mental health issues.

All customer facing employees are required to spot and escalate any such cases to the RG department for a further review and remedial action.

3.7 Third Party Contacts

Should you be contacted by someone other than the account holder, who claim that the customer is having difficulty with their gambling, unable to pay their bills, are in distress because of gambling, is at

risk of harm due to their gambling, or claims that the customer is underage please take the following steps:

- Do not disclose any personal information to the third party nor confirm whether they are our customer. Thank them for the information and advise them that the matter shall be investigated on our end.
- Try to establish contact with the account holder with a phone call and fully verify that they are the account holder.
- Once established that they are the account holder, explain that we are conducting a routine responsible gambling check.
- Do not disclose that we have received concerning communication from a third party as this could lead to agitation, hostile or uncomfortable situations.
- Check that they are comfortable with their gambling, and whether they've experienced any negativity or problems recently when it comes to their gambling.
- Add a comprehensive entry stating the method of contact, by who, and the context, as well as the outcome of the conversation with the player.
- In most cases due to the nature of the communication and its context, the account may be excluded for problem gambling behaviour.
- If no activity has been made on the account in the past weeks, the customer shall not be contacted as this might entice them to start playing again. Instead, the account may be temporarily restricted pending further customer contact.