

# Blue Pepper B.V.

## Policy on segregation of player funds

***Version 1.0***

***Date: 23.10.2024.***

**Document Information**

|                                |                                                                                               |
|--------------------------------|-----------------------------------------------------------------------------------------------|
| <b>Subject</b>                 | <i>Policy on segregation of player funds</i>                                                  |
| <b>Purpose</b>                 | <i>To set out the process for segregation of player funds</i>                                 |
| <b>Document Owner</b>          | <i>Finance Team</i>                                                                           |
| <b>Review</b>                  | <i>Annually or as early as required</i>                                                       |
| <b>Involvements</b>            | <i>All departments involved in or connected to the maintenance and upkeep of player funds</i> |
| <b>Document Classification</b> | <i>Internal Use Only</i>                                                                      |

**Version Control**

| <b>Date</b>        | <b>Version</b> | <b>Title</b>        | <b>Description</b>       |
|--------------------|----------------|---------------------|--------------------------|
| <i>23.10.2024.</i> | <i>1.0</i>     | <i>Finance Team</i> | <i>Document creation</i> |

**Approval**

| <b>Date</b>       | <b>Version</b> | <b>Signature</b>                                                                                                                             |
|-------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| <i>23.10.2024</i> | <i>1.0</i>     | <div>DocuSigned by:</div>  <div>95B70EC596BD4E6...</div> |

## Player funds management and segregation process

The process of player funds management and segregation is the following:

### Player Fund Accounts

Player funds are held in a designated bank account with a reputable and licensed financial institution. While the business may occasionally change banking facilities based on operational needs, it is always ensured that the new institution remains reputable, trusted, and fully licensed.

### Account Movements and Access

Player funds are maintained in a dedicated account, and the only transactions involving this account relate to player funds or transfers to another operational account. Access to transfer funds is limited to the Finance team, with all movements subject to approval and oversight by the Director of Finance, ensuring that no player funds are utilized for operational purposes.

### Daily Monitoring

The Director of Finance conducts daily reviews of the player funds account to confirm that all player liabilities are fully covered. Additionally, liquidity levels are regularly assessed to ensure there is sufficient coverage, further safeguarding player funds.

### Team Awareness and Continuity

The Director of Finance ensures that all Finance team members are informed of the requirement to maintain adequate liquidity to cover player liabilities. In the Director's absence, a designated Finance team member is responsible for ongoing daily monitoring to ensure continued liquidity coverage for player liabilities.