

Blue Pepper B.V. Operations Manual Curacao

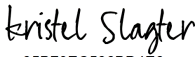
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Approval

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Introduction

This manual sets out the requirement to maintain an operations manual containing information about the manner and degree of compliance with the provisions laid down in or under the LOK 2024 (*Landsverordening op de Kansspelen — National Ordinance on Games of Chance*) Article 5.9, and the rules and restrictions attached to the Gaming License.

Should you have any inquiries on this manual, kindly reach out to the Compliance team at compliance@bluepepperbv.com.

Description of Games of Chance

Through a selection of Game Software Providers, Blue Pepper provides a diverse array of games and products to its client base. These partners have established partnerships with Blue Pepper, and the details and services are outlined in service agreements within the Company.

A breakdown of products and key software providers can be found below (*noting that this is subject to change*):

- **RNG and Live Casino Game Providers:**
 - EveryMatrix
 - Pragmatic Play
 - Booming Games
- **Sportsbook Providers:**
 - SportRadar MTS
- **Virtual Games:**
 - SportRadar

The outcome of each game event, such as a slot spin, is determined by specific technical mechanisms designed to ensure unpredictability, fairness, and compliance with legal standards. These mechanisms are referred to as outcome-determining elements and are applied by the game providers.

These elements will typically include random number generators and return to player configurations (RTP), amongst other controls.

Assurance of the robustness of these measures are primarily verified by certification by independent certification. The Company monitors customer activity and liaises with providers in the event of any concern.

Bet amounts are clearly displayed on the website and are subject to change.

Payment Options

Blue Pepper provides its customers with a variety of payment options to facilitate both deposits and withdrawals, ensuring convenience and security in transactions. The deposit and withdrawal options and payment limits are clearly displayed in the cashier on the website and are subject to change. Where possible, the Company seeks to enforce a closed loop process where withdrawals are returned to the depositing instrument.

Digital Record keeping (to include Player Data Management)

Collection and Use of Personal Data

All critical data, including, customer information, transaction and activity information, and system records, generated and/or recorded primarily in our core operational systems EBET through various sources, such as CRM, messaging services, APIs, payment services, game providers.

We process the data across various systems, including CRM, back-office platform, and internal operational tools, to manage accounts and services, ensure compliance with legal and regulatory obligations, maintain security and integrity, handle communications, and provide marketing and promotional communications.

Data Storage

All critical data is stored on High Availability (HA) databases and backup infrastructure hosted on Amazon Web Services (AWS). Data is held within a single AWS region, which contains three independent data centres (Availability Zones), providing redundancy and secure backups. The HA databases use a master-replica setup, where the master database handles all active operations and replica databases maintain synchronized copies to ensure continuous availability and protection against data loss.

Furthermore, the replication of the critical data stored on HA Database is made on servers hosted separately. Critical data is backed up daily, with full backups retained for 7 days and the most recent backup securely stored for 5 years to ensure regulatory compliance and long-term recoverability.

Player Data Logging

Player data is primarily logged and maintained in the back-office system as the central repository, with additional records generated in other systems such as customer communication and operational tools to support service and compliance activities.

Data Center Compliance (Tier-IV, Curaçao)

AWS data centers, used for storage of the critical business data, including user personal data and transaction and gaming activity information, are designed to meet or exceed Tier-IV concurrent maintainability standards, providing highly reliable and secure infrastructure for continuous operations. Critical components are replicated across multiple independent Availability Zones, enabling automatic failover, redundancy, and rapid recovery, with service uptime of 99.99% or higher.

Game and Financial Transaction Records

Blue Pepper utilises an advanced backend platform that serves as the cornerstone of its financial transaction management. This platform's comprehensive system database meticulously records every financial transaction, ensuring a detailed and auditable trail of all financial activities. This level of detail is crucial for maintaining transparency, enabling accurate financial reporting, and supporting compliance with regulatory requirements. It also provides an essential framework for analysing financial data, which can be used to inform strategic decisions and optimize operational efficiency. By leveraging this robust infrastructure, Blue Pepper is well-equipped to handle the complexities of financial management in real-time, safeguarding against errors and inconsistencies, and providing stakeholders with confidence in the company's financial integrity.

Privacy and Security Measures

Our privacy framework has been set out to ensure that we are compliant with the requirements emanating from the National Ordinance Personal Data Protection as well as any other applicable national and supranational Data Privacy requirements. This is driven by our desire to fully comply and uphold the highest standard of adhering to our Data Privacy regulations. Customers are required to read and accept our privacy policy upon registration and always remains accessible to our customers, should they wish to revisit it for further use and guidance.

For payment processing, the data and infrastructure related to payment transactions are managed by the Payment Gateway (APCO), boasting Level 1 PCI-DSS certification for top-tier security. The site's back office can be securely accessed via HTTPS, with individual logins and passwords for authenticated entry.

Blue Pepper has selected Continent 8 for hosting and data centre services, known for its expertise in providing secure and reliable data services. With hosting platforms at AWS and Hosting B2B (Curacao), Blue Pepper ensures redundancy and reliability in its hosting infrastructure, further enhancing the overall security and availability of its services.

Responsible Gaming Implementation

Blue Pepper views its brand reputation and social responsibility as interlinked with the Company value of integrity, which means successfully helping players prevent and mitigate the effects of problem gambling.

To manage the risks of problem gambling behaviour, Blue Pepper considers Responsible Gambling (RG) of critical importance to a players' experience and the sustainability of our business.

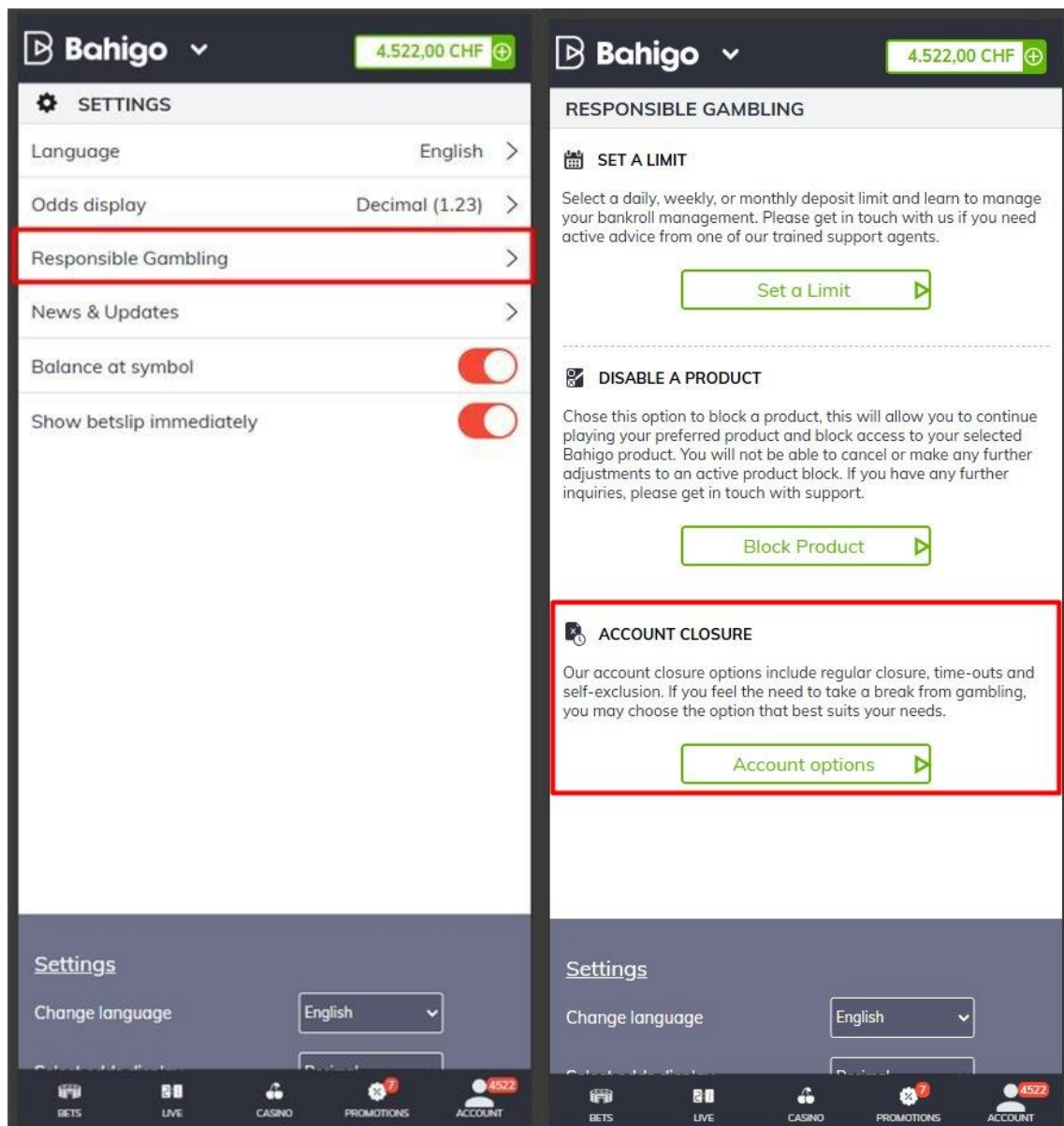
Our commitment is to create a sustainable customer base who can gamble in an entertaining, yet responsible manner. We want all players to be supplied with clear, concise information to help them understand how the games work, the risks of gambling, how to adopt healthy play habits, and what to do if gambling begins to create problems, including how and where to access assistance and support services.

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 "Personal details" section of the user account.

The Responsible Gambling tools at the customers' disposal are the following:

- **Deposit Limits** – enables the customer to set daily, weekly, monthly limits on deposits.
- **Disable a Product vertical** – enables the customer to block access to a select product vertical for a specified period of time.
- **Temporary Account Suspension** (i.e., Time-Out) – enables the customer to take a short break from gambling for a select period of time.
- **Self-Exclusion** – enables the customer to close their account for one year.

For a visual representation of the RG limit facility please refer to *Figure 14 'RG Limits & Tools available'*.



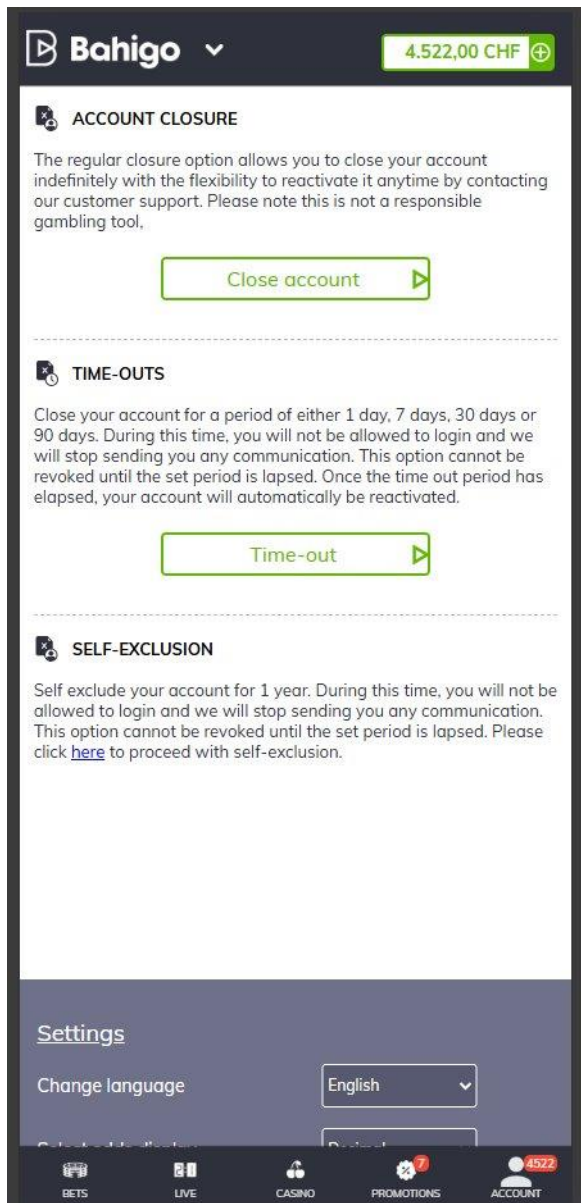


Figure 14 – RG Limits and Tools available.

Blue Pepper takes pride in its zero-tolerance stance when it comes to underage gambling, and as such, the Company employs the following measures to deter underage individuals from creating an account on its websites:

- An 18+ disclaimer 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.

Blue Pepper also ensures that customers who have self-excluded are also manually excluded from any duplicate or linked accounts, while the company's websites are designed to also capture the following data upon registration in order to prevent customers from creating duplicate accounts:

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

Disaster Recovery

Emergency Restoration Plans and Procedures

The company has procedure to ensure continuous operations and rapid recovery. Disaster recovery process varies by critical function and relies on prompt incident detection, reporting, and coordination with relevant personnel or service providers. As our critical functions are largely online and outsourced, recovery depends on cooperation with these providers.

In terms of our backend functions and back-office as the core infrastructure for managing operational data, the company employs a High Availability (HA) database system to ensure continuous access to critical data and minimize downtime.

The system uses a master-replica setup, where data modifications are confirmed only once both databases are synchronized. In the event of a master database failure, the replica automatically takes over to maintain uninterrupted service. For catastrophic failures affecting both databases, the most recent full backup is used for restoration.

General Terms and Conditions

Blue Pepper's latest version of [Terms and Conditions](#) is located on our website's footer. This is updated when required and we ensure to always add the version control and summary of changes.

Dispute Resolution Procedures

Blue Pepper B.V. holds a Complaints policy which documents the process on how the Company handles complaints according to CGA standards.

The Complaints process follows the guidelines issued by the CGA - 'CGA Player Complaints Policy V1.1 - June 2025'.

