18 U.S.C. § 2257 Compliance and Exemption Statement

CreamyPeach (creamypeach.com) is operated by **PEACHCREAM S.R.L.**, a company registered in Romania (Trade Register no. J2026041854006, CUI 55048995), with its registered office at Șoseaua Iancului nr. 53, bl. 102B, sc. C, et. 7, ap. 111, Sector 2, Bucharest, Romania ("**CreamyPeach**", "**we**", "**us**", "**our**").

Version: 1.1 | **Effective date:** 30 October 2026 | **Contact:** legal@creamypeach.com

This Statement sets out the position of CreamyPeach in relation to the record-keeping requirements of 18 U.S.C. §§ 2257 and 2257A and the regulations at 28 C.F.R. Part 75 (together, the "**Record-Keeping Requirements**"), which apply to producers of certain visual depictions of actual or simulated sexually explicit conduct made in, or distributed in, the United States.

1. Two categories of content on CreamyPeach

CreamyPeach hosts, or will host, three categories of content, which are treated differently under the Record-Keeping Requirements:

- **Category A – Artificially generated content.** Images, video, audio and text generated by artificial intelligence that depict **fictional AI characters** created by CreamyPeach or by verified creators. This content is labelled as artificially generated on the platform.
- **Category B – Content depicting real persons.** Content uploaded by verified creators that depicts the creator and/or other verified persons.
- **Category C – AI content derived from a verified creator's own likeness.** Artificially generated content produced from an AI persona that a verified real creator has created of their **own** likeness, with their recorded consent, under the Acceptable Use Policy. Because such content is derived from images of an actual human being, it is **not** covered by the Category A exemption and is treated in the same way as Category B for record-keeping purposes.

2. Category A – Exemption statement for artificially generated content

All Category A content on CreamyPeach is wholly computer-generated. The AI characters depicted in it are fictional. **No actual human being is depicted in, performed in, or was photographed or recorded for, any Category A content.** The characters are not based on, derived from, or made to resemble any real, identifiable person.

The Record-Keeping Requirements apply to visual depictions of actual human beings engaged in actual or simulated sexually explicit conduct and require producers to maintain records identifying each performer. Because Category A content contains no human performers, there are no performers whose identity or age can or must be recorded. **CreamyPeach is therefore exempt from the Record-Keeping Requirements in respect of all Category A content.**

Notwithstanding this exemption, CreamyPeach applies the following controls to all Category A content:

1. Every AI character is designed, documented and presented as an adult, with a canonical age of at least 21 and unmistakably adult physical characteristics, and is reviewed against these criteria before it is activated.
2. Every item of Category A content made available for viewing or sale is reviewed by a trained member of our Trust & Safety team before it is published, in accordance with our Content Moderation Policy, and is subject to the AI guardrails described in our Acceptable Use Policy and our internal AI Content Guardrails Policy.
3. CreamyPeach maintains, for every AI character, a character file recording the character's design specification, canonical adult age, the synthetic origin of the training data used to create the character, and the approval of the character by the Trust & Safety lead.
4. Any artificially generated depiction of a minor, or of an adult presented as a minor, is prohibited and is treated by CreamyPeach exactly as child sexual abuse material. See our Acceptable Use Policy.

3. Category B – Content depicting real persons

3.1 Creators are the producers

Category B and Category C content, where published, is created, produced and uploaded by independent creators, who are the **primary producers** of that content within the meaning of the Record-Keeping Requirements. Each creator is solely responsible for complying with the Record-Keeping Requirements, where they apply to that creator, including by:

- maintaining the records required by 18 U.S.C. § 2257 and 28 C.F.R. Part 75 for every person depicted in their content, including a copy of a government-issued identification document showing the person's legal name and date of birth, and the person's other names used;
- affixing to their content any compliance statement required of them; and
- making their records available for inspection as required by law.

The Creator Agreement requires every creator to comply with these obligations and to provide CreamyPeach, on request, with a copy of their records for any content published on CreamyPeach.

3.2 CreamyPeach's role in relation to Category B content

CreamyPeach does not film, photograph, direct, create, hire performers for, or otherwise produce Category B content. Its activities in relation to that content consist of the transmission, storage, retrieval, hosting, formatting and sale, as merchant of record, of content uploaded by creators, together with the review of that content before publication and the rejection or deletion of content that is unlawful or that does not comply with its Platform Policies, in a manner consistent with 47 U.S.C. § 230(c). CreamyPeach's position is that these activities fall within the exclusions from the definition of "producer" in 28 C.F.R.

§ 75.1(c)(4). CreamyPeach nevertheless maintains the records described in Section 3.3 in a form that would satisfy the Record-Keeping Requirements applicable to a secondary producer, so that compliance does not depend on that position.

3.3 Records maintained by CreamyPeach

In accordance with our Identity and Age Verification Policy, our Platform Policies and the standards of the payment card networks, CreamyPeach requires that, before any Category B content is published:

1. the creator has completed full identity and age verification through our independent verification provider, including authentication of a government-issued identity document and a biometric liveness and face-match check; and
2. every other person depicted in the content has completed the same verification and has signed a Co-Performer Release and Consent Form confirming that they are at least 18 years of age and consent to the production, publication and sale of the content.

For every person depicted in Category B or Category C content, CreamyPeach retains the verification result and reference issued by its independent verification provider (which authenticated the person's government-issued identification document and holds it under its own retention policy), a record of the person's legal name, date of birth and every other name, alias, stage name or username used by that person on the platform, the signed release (and, for Category C, the recorded likeness consent), and a cross-reference identifying every item of content in which the person appears, including its title, URL and date of first publication. These records are kept in a secure, searchable and cross-indexed form for 10 years after the end of the creator relationship, under the custody of the records contact named in Section 4, and are made available to competent law enforcement and regulatory authorities on a lawful request. The Creator Agreement additionally requires each creator to keep a copy of each depicted person's identification document and release for at least 7 years after the content was last available, and to produce it within 48 hours of request.

4. Point of contact for record-keeping inquiries

Inquiries from law enforcement, regulators or rights holders concerning the age or identity of any person depicted in content on CreamyPeach, or concerning this Statement, should be addressed to:

Filip Suciu, Chief Executive Officer and custodian of records
PEACHCREAM S.R.L.
Șoseaua Iancului nr. 53, bl. 102B, sc. C, et. 7, ap. 111, Sector 2, Bucharest, Romania
Email: legal@creamypeach.com (subject line "2257 Inquiry")

5. Minimum age

All persons depicted in any content on CreamyPeach, and all persons who use CreamyPeach, are at least 18 years of age. CreamyPeach does not knowingly permit any

person under 18 to access the platform, to appear in content, or to be depicted in content in any form. See our Identity and Age Verification Policy and our Acceptable Use Policy.

6. Updates

This Statement is reviewed whenever there is a change in the Record-Keeping Requirements, in applicable law, or in the categories of content hosted on CreamyPeach, and in any event at least annually. The current version is always available at creamypeach.com. Material changes will be notified to registered users by email or in-platform notice at least 14 days before they take effect, unless a change is required by law, in which case it takes effect immediately.