

Test report

Product name	: Winning Match
Jurisdiction	: United Kingdom
Applicant	: Virtue Fusion (Alderney) Ltd.
Test institute	: Trisigma B.V.
Type of product	: Scratchcard game

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Quality Manager



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1. TEST INSTITUTE

Trisigma B.V. (here after Trisigma) provides compliance and type approval services to the gaming industry and authorities. The Trisigma test labs are located in The Netherlands and have extensive facilities for testing and approval of online and land based gaming systems. Trisigma has been accredited by the Dutch Council of Accreditation for both standards ISO/IEC 17020 (with identification I254) and ISO/IEC 17025 (with identification L531) within the scope of compliance testing and examination of gaming systems. It is Trisigma's policy to carry out all activities according to these high quality standards in order to assure the international recognition of Trisigma certifications, reports and declarations.

This report presents the Trisigma final conclusion of compliance, the scope of examination, the specific identification of the gaming system and an overview of the applicable requirements including the appraisal with regard to the gaming system under examination.

This report has been constructed under the supervision and responsibility of Trisigma's Quality Manager. Every effort has been made to ensure the quality and accuracy of the information contained in this report. If errors or omissions are discovered, please contact us with details. Trisigma B.V. reserves the right to issue revisions of this test report if additional information is presented or discovered.

2. TEST METHODS

Trisigma examines gaming systems using accredited and recognized assessment methods. These methods cover all applicable components and characteristics of the product under examination.

Qualified test engineers carry out a comprehensive compilation of test methods using documentation review, measurements, evaluation of calculations and simulations, statistical tests, functional tests, visual assessment and source code analyses and supervised builds in order to examine the product from a requirements point of view. These test methods comprises the functional and statistical behavior of the gaming system.

3. GENERAL REPORT DATA

Report number	3s.18.179_UK-GI.R1
Jurisdiction	United Kingdom
Requirements	Remote gambling and software technical standards June 2017
Additional regulations or directions	Testing strategy for compliance with remote gambling and software technical standards, June 2017.
Test period	July - August 2018
Project Engineer	P. Essers
Revision information	This revision R1 supersedes the previous version 3s.16.139_UK.R0. R1 updates the following: - Desktop (PC) added as a delivery channel.
References	3s.15.597_UK.R0 Report RNG

4. APPLICANT DATA

Company name	Virtue Fusion (Alderney) Ltd.
Address	10 Jamestown Road NW1 7BY LONDON UNITED KINGDOM
Contact	Mr. K. Posper

5. CONCLUSION AND RECOMMENDATION

The game complies with the United Kingdom Remote gambling and software technical standards.

It is the recommendation of Trisigma that the game be approved for use in the jurisdiction of the United Kingdom.

The game has been tested according with the procedure for testing of the Testing strategy for compliance with remote gambling and software technical standards, June 2017.

The game has been assessed on the English language version.

NOTE

Software that meets the requirements of the UK RTOS is considered by the Gibraltar Gambling Commissioner's office to be compliant with the requirements of the Gibraltar RTOS.

6. GAME INFORMATION

Type of game	Scratchcard game
Client delivery channel	HTML5 browser based for Mobile / Tablet / Desktop (PC)
Game rules	Winning Match is a video scratchcard game. The game displays 3 rows of 3 scratch panels and awards a prize if any 3 symbols are matched.
Jackpot	No
Game software identification	15.3.0
Minimum bet	0.50
Maximum bet	0.50
Target percentage RTP	90%
Maximum autoplay games	100

7. PLATFORM AND TEST EQUIPMENT INFORMATION

Platform information:

Supplier	Virtue Fusion Ltd
Version	15.3.0

The game was tested with the following equipment:

Device	OS	Browser
PC HP ProDesk 490 G2 MT Intel i7 (8GB RAM)	Windows 10 Pro (64bit)	Google Chrome (version 61.0.3163.100) Mozilla Firefox (version 56.0.1)
Samsung Galaxy S4	Android (version 5.0.1)	Chrome
Apple iPhone 6 Plus	iOS (version 10.2.1)	Safari
Samsung Galaxy Tab S2	Android (version 6.0.1)	Chrome
Apple iPad Air 2	iOS (version 10.3.3)	Safari

8. REQUIREMENTS – TEST RESULTS OVERVIEW

Requirements within this scope are included in this test results overview. Where requirements are applicable to either game or platform these requirements are included in this test result overview, and are marked 'Not Applicable' when compliance is determined only by the platform.

Test results overview		
Article	Requirement Text	Verdict
RTS aim 1	To provide customers with easily accessible information about their current balances and facilities that enable them to review previous gambling and account transactions.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 1A	Where customers hold a credit or debit balance, the pages or screens used for gambling and to move money into and out of accounts must display the customer's current account balance, in the currency of their account (eg dollars, euros or pounds sterling), whenever that customer is logged in. Where it is not practical to display current balance from gambling screens then easily accessible links to this information must be provided.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 1A a.	Where funds are moved between products (for example, from a betting product to a gaming product) the balance does not necessarily have to represent all of the balances that a customer may hold with an operator in respect of those products.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 1A b.	For telephone betting this information is to be delivered at the customer's request by the customer service agent or automated response system	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 1B	Customers must have easy access to at least three months account and gambling history without having to contact the licensee. A minimum of 12 months of gambling and account history must be made available on request. The ability to request this information should be made clear to customers and be provided as soon as is practicable.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 1B a.	The gambling and account history should include:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 1B a.i.	credit and debit information such as deposits, withdrawals, movement of funds between products, payments off credit accounts, entry fee deductions, and bonus information, as appropriate	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 1B a.ii.	bets placed, the results of bets, winnings paid	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 1B a.iii.	For gaming (including bingo) full or summarised gaming information should be available, for example, £10 taken into game, £100 turned over, £3 taken away from game. Where detailed historic game information may not necessarily be directly available to customers, as a minimum, customers must have easy access to details of the last game played and summarised information for previous activities	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 1B a.iv.	where customers are able to move funds between gambling products, account information and statements should clearly display movement of funds into and out of products	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 1B a.v.	an option for customers to use their own defined time period or to select from a range of time periods a summary total for the period selected eg win/loss.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 1B b.	For telephone betting and restricted display devices, where customers demonstrate that they also have access to websites – by registering online or using other online products – it is acceptable to provide access to statements via these websites, otherwise customers should be sent a regular copy of their statement via email, fax or post unless they elect not to receive this information. Customers should be sent a statement on request, even if they have opted out of receiving regular statements.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 1C – This provision will come into effect on 1 April 2018	Customers must be able to access information about their net deposits.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 1C	Net deposits are defined as the running total of all deposits minus the sum of all withdrawals for the lifetime of the account. This should be displayed at an account level so the figure represents the net position of all payment methods. Where full account lifetime history isn't possible then, as a minimum, the net deposits should be displayed from 1 April 2018, or the account opening date if after 1 April 2018. Information which explains the net deposit figure, including the timeframe it covers, should be provided.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 2	To enable the customer to understand the value and content of their transactions.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 2A	The remote gambling system must make available clear information about the amount of money being gambled by the customer, including any conversions from one form of currency to another, or from currency to credits, chips or other tokens etc, at the point of conversion.	PASS
	Remarks/Findings: The required information is clearly stated on the artwork.	

RTS implementation guidance 2A a.	The financial commitment for each gamble should be displayed somewhere on the screen either in the currency of the customer's account or in the currency of the product. The use of credits, chips or other tokens with no face value should only be used when the corresponding currency amount is clearly visible, or where the customer is not staking additional money such as a poker tournament.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A b.	Any conversion from one currency to another should be clearly presented to the customer and any conversion rules are also to be presented. Where currency is converted into tokens, chips or credits, etc, the conversion should be clearly displayed.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A c.	Information about the value of the gamble should be displayed including, as appropriate:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A c. i.	unit stake and total stake, whether currency, credit, tokens, chips, or any other form of payment	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A c. ii.	entry fees, for example, payment for entry to poker tournaments	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A c. iii.	the price of lottery tickets and the number of draws entered.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A d.	For telephone gambling, this information is to be delivered by the customer service agent or automated response system.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2A e.	For subscription lotteries, sending a confirmation by email or post and/or displaying the stake and the number of draws entered when the customer subscribes is sufficient.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 2B	The gambling system must be designed to display sufficient relevant information about the customer's gamble so that the content of the gamble is clear.	PASS
	Remarks/Findings: Instructions are clear and are deemed not to be misleading.	
RTS requirement 2B (continued)	This information must be made available before the customer commits to the gamble including, for example, in the artwork and textual information displayed during gaming, or on an electronic equivalent of a betting slip or lottery ticket.	PASS
	Remarks/Findings: The customer is not forced to play by selecting the game. The game can be viewed and rules can be read before laying a wager on the game.	
RTS implementation guidance 2B a.	The following items provide guidelines about the type of information that may be relevant:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B a. i.	selections – the items the customer has chosen to gamble on;	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 2B a. ii.	the bet type	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B a. iii.	the accepted odds, for example current odds, starting price, first show, etc.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B a. iv.	the odds format that will take precedence in settling bets must be set out in the rules.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B a.	These items, where relevant, are also required on applications designed for use on restricted display devices.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B b.	For telephone gambling the content of the customer's bet should be read back to them before the bet is confirmed.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B c.	Where the customer is able to choose, through the use of a third party user-interface, to override the display of this information, this must not be the default option. That is, the customer must make an active choice not to have the information available or to install a user-interface that does not contain the information. The remote gambling system should continue to make available or send the information to the customer; it should not assume that the information is not required.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2B d.	For subscription lotteries, sending a confirmation by email or post and/or displaying the first draw and the number of draws for which the customer will be entered is sufficient.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 2C – This provision will come into effect on 1 April 2018	The gambling system must enable customers to choose whether to accept price fluctuations (in either direction) that occur after their bet is requested.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 2C a.	Players should be presented with options to control whether a price change should be accepted or not.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2C b.	These options must be presented on a per bet basis, except in circumstances where a customer has requested a default account setting to disable price change alerts prior to bet acceptance. Where the functionality is offered at an account level the default option should not be set to accept all fluctuations. Where a customer chooses not to accept price changes automatically any bet where the price changes must be reoffered before it is accepted.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2C c.	Information sufficient to explain the options to the customers should be provided.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 2C d.	An optimum solution would enable consumers to choose to automatically accept price movements within a particular margin range. Account level options offered to consumer could include accepting all bets with higher price, accepting all bets with shorter price or accepting all bets regardless of price movements.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 2C e.	This requirement does not intend to capture currency fluctuations	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 2D	Customer who choose to use third party user interfaces must be informed that applications may not display full information about their gambles.	Not Applicable
	Remarks/Findings: The game does not support third party user interfaces.	
RTS implementation guidance 2D	Information should be included in terms and conditions, rules or other general information about the gambling product that is made available to and/or sent out to customers.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 3	To enable customers to make informed decisions about whether to gamble based on their chances of winning, the way the game, lottery or event works, the prizes or payouts on offer and the current state of multi-state games or events.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 3A	An explanation of the applicable rules must be easily available to the customer before they commit to gamble.	PASS
	Remarks/Findings: The required information is visible without staking money.	
RTS requirement 3A (continued)	The content including artwork and text must be accurate, and sufficient to explain all of the applicable rules and how to participate.	PASS
	Remarks/Findings: Instructions are clear and are deemed not to be misleading.	
RTS requirement 3A (continued)	All reasonable steps must be taken to ensure that the content is understandable.	PASS
	Remarks/Findings: The information given is correct and is not misleading.	
RTS implementation guidance 3A a.	Explanatory content includes information in artwork and text displayed within the virtual event, in 'help' or 'how to play' pages, or other supporting material.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A b.	Links to the information should be prominently placed, for example on home pages for gaming sections, game selection pages or menus, or within individual games, so that customers can easily locate them.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A c.	As a minimum, restricted display devices should provide explanatory content via a menu item or other link.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d.	The following items provide guidelines on the type of explanatory content that may be relevant and should be considered for inclusion:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d. i.	the name of the game, lottery or virtual event	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 3A d.ii.	the applicable rules, including clear descriptions of what constitutes a winning outcome	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d.iii.	restrictions on play or betting, such as any play duration limits, maximum wins, etc	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d. iv.	the number of decks or frequency of shuffles in virtual card games	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d. v.	whether there are contributions to jackpots (progressives) and the way in which the jackpot operates, for example, whether the jackpot is won by achieving a particular outcome	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d. vi.	instructions on how to interact with the game	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d.vii.	rules pertaining to metamorphosis of games, for example, the number and type of tokens that need to be collected in order to qualify for a feature or bonus round and the rules and behaviour of the bonus round	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3A d.viii.	the rules for entering a single lottery draw or a series of lottery draws and the frequency of the draws.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 3B	Where relevant, as the game or event progresses, information that may reasonably be expected to enable the customer to understand the current state must be displayed.	PASS
	Remarks/Findings: The required information is displayed on the artwork.	
RTS implementation guidance 3B	The following items provide guidelines on the type of information that may be relevant.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3B a.	Where a game builds up a collection of tokens (symbols etc), the current number collected.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3B b.	An indication of which rules are currently relevant, such as displaying 'bonus round' or other feature labels.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3B c.	This requirement does not apply to lotteries.	
	Remarks/Findings: This is an explanatory text only.	

RTS requirement 3C	<p>For each virtual event, game (including bingo), or lottery, information that may reasonably be expected to enable the customer to make an informed decision about his or her chances of winning must be easily available before the customer commits to gamble.</p> <p>Information must include:</p> <ul style="list-style-type: none"> i. a description of the way the game works and the way in which winners are determined and prizes allocated ii. house edge (or margin) iii. the return to player (RTP) percentage or iv. the probability (likelihood) of winning events occurring. 	PASS
	Remarks/Findings: The required information is visible without staking money.	
RTS implementation guidance 3C a.	<p>The following items provide further guidance on acceptable types of information about the likelihood of winning:</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C a. i.	<p>for types of peer-to-peer games where the likelihood of winning may depend on skill and/or the actions of other participants, a description of the way the game works and how winners are determined will be sufficient;</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C a. ii.	<p>for bingo, and some types of lottery or other games where it is not possible to determine the likelihood of winning because it depends on the eventual number of participants, a description of the way in which prizes are allocated will be sufficient.</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C a. iii.	<p>the average theoretical return to player percentage. Where an event (other than peer-to-peer) involves an element of skill, return to player percentage should be calculated using either the auto-play strategy or a standard/published strategy;</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C a. iv.	<p>the house edge, margin or over-round, for example for a virtual race;</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C a. v.	<p>the probability of each winning event occurring, or such information as may reasonably be expected to allow the customer to calculate the probability that the event will occur.</p> <p>The nature of some games may mean that the game itself provides sufficient information, for example, the likelihood of rolling a six on a six-sided die would not require further explanation.</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C a. vi.	<p>The odds displayed in virtual event betting should reflect the probability of each event occurring as closely as possible.</p>	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3C b.	<p>Information may be included in artwork and text displayed within the virtual game or event, in 'help' or 'how to play' pages, or other supporting material.</p>	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 3C c.	Information should be easily accessible, for example by placing links on home pages for gaming or virtual event sections, game selection pages or menus, or within individual games.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 3D	For each virtual event, game (including bingo), or lottery, content describing the potential prizes and payouts or the means by which these are calculated or determined must be easily available before the customer commits to gamble.	PASS
	Remarks/Findings: The required information is also accessible while not in game play.	
RTS implementation guidance 3D a.	Information should be made available about the amounts that customers may potentially win, for example in the form of pay-tables, or by showing the odds paid for particular outcomes.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3D b.	For peer-to-peer games where the prize is determined based on the actions of the participants, a description of the way the game works and the rake or commission taken will be sufficient.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3D c.	For lotteries and other types of events where the potential amount or prize paid out may not be known before the customer commits to gamble, describing the way in which the prize amount is determined will be sufficient.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3D d.	Information may be included in artwork and text displayed within the virtual event, in 'help' or 'how to play' pages, or other supporting material.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3D e.	Information should be easily accessible, for example by placing links on home pages for gaming sections, game selection pages or menus, or within individual games.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 3D f.	Displays of jackpot amounts that change over time ('progressives') should be updated as frequently as practicable, particularly after the amount has been reset following a win.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 4	To reduce the risk that customers are unfairly disadvantaged by technical factors that may affect speed of response, and to ensure customers are made aware of the risk	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 4A	Where speed of interaction has a significant effect on the customer's chance of winning, operators must assess the level of risk and demonstrate to the Commission that they are taking reasonable steps to reduce the risk to customers.	Not Applicable
	Remarks/Findings: The game does not support an interaction that has a (significant) effect on the customer's chance of winning.	
RTS implementation guidance 4A	Examples of possible approaches include:	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 4A a.	estimating the degree of network latency (delay) a customer is experiencing and displaying regularly updated information to the customer about any disadvantage that they may be operating under (e.g. high, medium, low)	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 4A b.	applying a handicapping system based on estimated performance and/or system latency	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 4A c.	treating winning responses that arrive within a period of time as simultaneous and implementing a policy on how simultaneous wins are to be dealt with.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 4B	For time-critical events, the customer should be informed that they might be at a disadvantage because of technical issues such as slower network speeds, or slower end user device performance.	Not Applicable
	Remarks/Findings: The game does not support time-critical events.	
RTS implementation guidance 4B	a. Information should be included in game descriptions, rules, 'help' or 'how to play' pages.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 5	To ensure that the gambling system implements the operator's rules, game rules and betting rules as they are described to the customer.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 5A	All reasonable steps should be taken to ensure that gambles are accepted, processed and settled in accordance with the operator's published terms and rules, and the rules of the specific game, event, or bet.	PASS
	Remarks/Findings: The game operates and interacts according to the published rules.	
RTS requirement 5A (continued)	Where unexpected system flaws, faults, or errors that affect the customer occur, steps are to be taken as soon as practicable to remedy the problem and ensure that the customer is treated fairly according to the circumstances.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 5A a.	Under normal operation, in the absence of technical faults, the system should act in accordance with the rules.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 5A b.	Reasonable steps include testing of systems and new products against the published rules and monitoring the ongoing performance of those products in the live environment. Refer to our testing strategy for more detailed requirements in this area.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 5A c.	Customers should be notified when errors that affect them, for example, incorrectly settled bets, have occurred as soon as practicable after the event occurs. Steps should be taken to rectify the error, for example, by manually adjusting the customer's account.	
	Remarks/Findings: This is an explanatory text only.	

RTS aim 6	To minimise the risk that customers are misled about the likelihood of winning due to the behaviour of play-for-free games.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 6A	Play-for-free games must implement the same game rules as the corresponding play-for-money games offered on the same facilities (ie the same website). Operators must take all reasonable steps to ensure that play-for-free games accurately represent the likelihood of winning and prize distribution in the play-for-money game. For the purpose of this requirement playing a game includes participating in a lottery and/or betting on a virtual event.	Not Applicable
	Remarks/Findings: Play-for-fun is out of scope of this test report. Testing is restricted to the play-for-money game.	
RTS requirement 6A (continued)	Operators must take all reasonable steps to ensure that play-for-fun games accurately represent the likelihood of winning and prize distribution in the play-for-money game.	Not Applicable
	Remarks/Findings: Play-for-fun is out of scope of this test report. Testing is restricted to the play-for-money game.	
RTS requirement 6A (continued)	For the purpose of this requirement playing a game includes participating in a lottery and/or betting on a virtual event.	Not Applicable
	Remarks/Findings: This is not a lottery and/or betting on a virtual event game.	
RTS implementation guidance 6A a.	The play-for-free game should use the same RNG as the corresponding play-for-money games, another RNG that fulfils the requirements set out in RTS requirement 7A, or a publicly available RNG, (such as those available as standard within operating systems) that may reasonably be expected to produce no systematic bias.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 6A b.	Where 6a is not reasonably possible, it should be demonstrated that the method of producing outcomes does not introduce a systematic bias, for example:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 6A b. i.	if tables of random numbers are used, they should be sufficiently long to support a large number of games without repeating	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 6A b. ii.	the method should represent game probabilities accurately, ie it should not produce a higher than expected proportion of winning outcomes.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 6A c.	The prize distribution should accurately represent the play-for-money game. For example, where play-for-free games use virtual cash, the virtual cash payouts should be the same as the corresponding play-for-money game, and where tokens are used, the allocation of tokens as prizes should be proportionate to the stakes and prizes in the play-for-money game.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 6A d.	Where videos are used to advertise a game's features it should be made clear to consumers where footage has been edited or sped-up for promotional purposes. Similarly, where a non-consumer (eg supplier's) website is demonstrating a game with higher than normal returns (ie on a website that is different to the real money gambling facility websites) it should be made clear that it is a demonstration game specifically designed to demonstrate the bonus features.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 7	To ensure that games and other virtual events operate fairly.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 7A	Random number generation and game results must be 'acceptably random'. Acceptably random here means that it is possible to demonstrate to a high degree of confidence that the output of the RNG, game, lottery and virtual event outcomes are random, through, for example, statistical analysis using generally accepted tests and methods of analysis. Adaptive behaviour (i.e. a compensated game) is not permitted.	PASS
	Remarks/Findings: This is a game only test report. The correct processing by the game of RNG driven elements was included in the examination. However, since the RNG being used in the platform has already been certified, testing of the RNG itself is not included. See section 'References' for the RNG test report details.	
RTS requirement 7A (continued)	Where lotteries use the outcome of other events external to the lottery, to determine the result of the lottery the outcome must be unpredictable and externally verifiable.	Not Applicable
	Remarks/Findings: This is not a lottery game.	
RTS implementation guidance 7A a.	RNG's should be capable of demonstrating the following qualities:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A a. i.	the output from the RNG is uniformly distributed over the entire output range and game, lottery, or virtual event outcomes are distributed in accordance with the expected/theoretical probabilities	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A a. ii.	the output of the RNG, game, lottery, and virtual event outcomes should be unpredictable, for example, for a software RNG it should be computationally infeasible to predict what the next number will be without complete knowledge of the algorithm and seed value	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A a. iii.	random number generation does not reproduce the same output stream (cycle), and that two instances of a RNG do not produce the same stream as each other (synchronise)	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A a. iv.	any forms of seeding and re-seeding used do not introduce predictability	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A a. v.	any scaling applied to the output of the random number generator maintains the qualities above.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 7A b.	For lotteries using external events - where it is not practical to demonstrate 7a. - the events outcomes should be:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A b. i.	unpredictable, that is, events should be selected only where they may reasonably be assumed to be random events	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A b. ii.	unable to be influenced by the lottery operator (or external lottery manager)	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A b. iii.	publicly available and externally verifiable, for example, events that are published in local or national press would be acceptable.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A c.	For games or virtual events that use the laws of physics to generate the outcome of the game (mechanical RNGs), the mechanical RNG used should be capable of meeting the requirements in a. where applicable and in addition:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A c. i.	the mechanical pieces should be constructed of materials to prevent decomposition of any component over time (e.g. a ball shall not disintegrate)	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A c. ii.	the properties of physical items used to choose the selection should not be altered	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A c. iii.	players should not have the ability to interact with, come into physical contact with, or manipulate the mechanics of the game.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7A d.	Restricting adaptive behaviour prohibits automatic or manual interventions that change the probabilities of game outcomes occurring during play. Restricting adaptive behaviour is not intended to prevent games from offering bonus or special features that implement a different set of rules, if they are based on the occurrence of random events.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 7B	As far as is reasonably possible, games and events must be implemented fairly and in accordance with the rules and prevailing payouts, where applicable, as they are described to the customer.	PASS
	Remarks/Findings: The game operates and interacts according to the published rules.	
RTS implementation guidance 7B a.	Games should implement the rules as described in the rules available to the customer before play commenced.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7B b.	The mapping of the random inputs to game outcomes should be in accordance with prevailing probabilities, pay tables, etc.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 7B c.	When random numbers, scaled or otherwise, are received, e.g. following a game requesting a sequence of random numbers, they are to be used in the order in which they are received. For example, they may not be discarded due to adaptive behaviour.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7B d.	Numbers or sequences of numbers are not to be discarded, unless they fall outside the expected range of numbers required by the virtual event – such an occurrence should result in an error being logged and investigated.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 7C	Game designs or features that may reasonably be expected to mislead the customer about the likelihood of particular results occurring are not permitted, including substituting losing events with near-miss losing events and simulations of real devices that do not simulate the real probabilities of the device.	PASS
	Remarks/Findings: The game design and/or game features are not misleading.	
RTS implementation guidance 7C a.	Where a virtual event simulates a physical device, the theoretical game probabilities should match the probabilities of the real device (for example, the probability of a coin landing heads must be 0.5 every time the coin is tossed).	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7C b.	Where multiple physical devices are simulated the probabilities of each outcome should be independent of the other simulated devices.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7C c.	Games may not falsely display near-miss results, that is, the event may not substitute one losing outcome with a different losing outcome.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7C d.	Where the event requires a pre-determined layout (for example, hidden prizes on a map), the locations of the winning spots should not change during play, except as provided for in the rules of the game.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7C e.	Where games involve an element of skill, every outcome described in the virtual event rules or artwork should be possible, that is, the customer should have some chance of achieving an advertised outcome regardless of skill.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7C f.	Where a customer contributes to a jackpot pool, that customer should be eligible to win the jackpot whilst they are playing that game, in accordance with the game and jackpot rules.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 7D	The rules, payouts and outcome probabilities of a virtual event or game may not be changed while it is available for gambling, except as provided for in the rules of the game, lottery or virtual event. Such changes must be brought to customer's attention.	PASS
	Remarks/Findings: The game does not support a change of rules, payouts or outcome probabilities.	

RTS implementation guidance 7D a.	Changes to game or event rules, paytables or other parameters that change the way in which a game, lottery, or event works, the winnings paid, or likelihood of winning (except as described in 7Dc), should be conducted with the game or event taken offline or suspended.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D b.	Altered games, lotteries, and events should display a notice that informs customers that the game or event has been changed, for example, 'rules changed', 'new odds', or 'different payouts'. The notice should be displayed on game selection screens and on the events themselves if it is possible for the customer to go straight to the event without using a selection screen.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D c.	This requirement is not intended to prevent games and virtual events where specified changes occur legitimately, in accordance with the game or event rules, for example:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D c. i.	virtual events, such as virtual racing products where the odds differ from event to event depending on the virtual runners	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D c. ii.	virtual games, such as bingo where the odds of winning are dependent on the number of entrants	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D c. iii.	games with progressive jackpots, where the amount that can be won changes over time	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D c. iv.	games with bonus rounds where different rules apply, so long as these rounds are properly described to the customer	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 7D c. v.	unspecified changes to rules, paytables or other parameters that change the way in which a game, lottery or event works are not permitted, for example, rules that state 'game rules may be changed at any time' would not be acceptable.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 7E	Except in the case of subscription lotteries, the system clearly and accurately display the result of the game or event and the customer's gamble.	PASS
	Remarks/Findings: The required information is clearly and accurately presented to the customer.	
RTS requirement 7E (continued)	The result must be displayed for a length of time that may reasonably be expected to be sufficient for the customer to understand the result of the game or event in the context of their gamble.	PASS
	Remarks/Findings: The game outcome is displayed until a new play is started by the player.	
RTS implementation guidance 7E	The game artwork and text should be sufficient to provide the customer with all of the information required to determine whether they have lost or won, and the value of any winnings.	
	Remarks/Findings: This is an explanatory text only.	

RTS aim 8	To ensure that the customer is still in control of the gambling where auto-play functionality is provided and to minimise the risk that the functionality disadvantages a customer or that auto-play or other strategy advice is misleading.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 8A	The gambling system must provide easily accessible facilities that:	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 8A a.	make available the following three controls, each of which stops auto-play functionality when it is triggered-	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 8A a. i.	'loss limit', ie where the player selects an option to not lose more than X from their starting balance, where X is an amount that can be selected by the player. A 'loss' in this context equates to accumulated auto-play bets minus accumulated auto-play wins.	PASS
	Remarks/Findings: The game does not support an auto-play function.	
RTS requirement 8A a. ii.	'single win limit' ie single win greater than Y where Y is an amount that can be selected by the player and	PASS
	Remarks/Findings: The game does not support an auto-play function.	
RTS requirement 8A a. iii.	'jackpot win' (where applicable).	PASS
	Remarks/Findings: The game does not support an auto-play function.	
RTS requirement 8A b.	require auto-play to be implemented in such a way that each time a customer chooses to use auto-play they must select the stake, the number of auto-play gambles and at least the first of the above three controls.	PASS
	Remarks/Findings: The game does not support an auto-play function.	
RTS requirement 8A continued	The number of auto-play gambles must not exceed 100 in one batch. During auto-play the customer must be able to stop the auto-play regardless of how many auto-play gambles they initially chose or how many remain.	PASS
	Remarks/Findings: The game does not support an auto-play function.	
RTS implementation guidance 8A a.	Auto-play should not override any of the display requirements (for example, the result of each gamble must be displayed for a reasonable length of time before the next gamble commences, as set out in RTS 7E).	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 8B	In relation to skill and chance games, strategy advice and auto-play functionality must be fair, not misleading and must not represent a poor choice.	Not Applicable
	Remarks/Findings: The game does not support strategy advice or an auto-play function.	
RTS implementation guidance 8B	In implementing this control, the following should be considered, where appropriate:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 8B i.	if there is a standard strategy, for example, for well-known games like blackjack, the standard strategy should be used	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 8B ii.	strategies or auto-play should (theoretically) produce at least the average Return to Player (RTP) for the game over time.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 9	To ensure that progressive jackpot systems operate fairly.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 9A	An explanation of the jackpot rules must be clearly available to the customer before they commit to gamble.	Not Applicable
	Remarks/Findings: The game does not support a jackpot.	
RTS implementation guidance 9A a.	The rules for a jackpot shall describe how it is funded, what the start-up seed and any ceiling values are. The jackpot system's return to player percentage should be displayed as per RTS 3C, this could be one combined game and progressive jackpot RTP figure or broken down into the base game and jackpot component. If a player is not eligible for a game's progressive jackpot prize this should be made clear, along with their respective theoretical RTP.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 9A b.	The rules for a jackpot shall describe how the prizes are determined and awarded, including what happens when two or more players simultaneously trigger the same jackpot, or appear to simultaneously trigger the jackpot, for example due to network latency issues.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 9A c.	All eligible players should be able to see the current jackpot values and these should be updated as frequently as is practicable, particularly after the amount has been reset following a win.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 9A d.	Where a jackpot is capped at a ceiling value, an explanation of how subsequent player contributions are handled should be provided (eg the operation of any redirected overflow or reserve pools).	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 9B	Jackpot systems must be configured and operated with adequate fairness and security.	Not Applicable
	Remarks/Findings: The game does not support a jackpot.	
RTS implementation guidance 9B a.	The gambling system shall maintain strict access and logging controls over the configuration and changes made to live jackpots.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 9B b.	Where a customer contributes to a jackpot pool, that customer should be eligible to win the jackpot whilst they are playing that game. The chances of winning a jackpot should increase in correlation with the amount contributed.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 9B c.	Where a jackpot containing player contributions is decommissioned those contributions need to be returned fairly according to the circumstances, with priority given to the players who made the contributions. Some example methods to achieve this include: i. waiting until the jackpot is next awarded before decommissioning it. ii. adding any remaining contributions onto another jackpot system, preferably one with a similar player base. iii. returning remaining contributions as a one off event, with adequate customer disclosure to explain the origin of money.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 9B d.	The gambling system shall ensure that a winning customer is notified of a jackpot win immediately after it is triggered and that other participating customers are adequately notified of the jackpots reset value.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 10	To ensure that customers are treated fairly in the event of interrupted play or betting and that they are aware of how they will be treated if interruptions occur.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 10A	Operators must take all reasonable steps to ensure that their policies for instigating or dealing with service interruptions are fair and do not systematically disadvantage customers.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 10A a.	For gaming the following policies should be applied:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A a. i.	where an interruption occurs after the operator receives notification of the customer's gamble and where the customer can have no further influence on the outcome of the event or gamble the results of the gamble should stand	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A a. ii.	where an interruption to a single-participant single stage event occurs before an outcome has been generated the customer should have any deducted stake returned to their balance	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A a. iii.	for stateful games (games where there are multiple stages or decision points), all reasonable steps should be taken to restore the game to its last known state to enable the customer to complete the game	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A a. iv.	games with multiple participants (equal chance or otherwise) should be dealt with fairly on a case-by-case basis	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A a. v.	progressive jackpot values should be restored to their pre-failure state.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A b.	For peer-to-peer betting the following policies should be applied:	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 10A b. i.	where a service interruption is caused by failures in the gambling system, operators should suspend betting on all betting markets that have been affected by a significant event before service is restored	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10A b. ii.	other failures should be dealt with fairly on a case-by-case basis.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 10B	Systems must be capable of recovering from failures that cause interruptions to gambling, including where appropriate, the capability to void gambles (with or without manual intervention), the capability to suspend betting markets, and taking all reasonable steps to retain sufficient information to be able to restore events to their pre-failure state.	PASS
	Remarks/Findings: The game will be continued from the point of interruption after a renewed login.	
RTS implementation guidance 10B a.	For gaming the system should:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10B a. i.	be capable of voiding gambles and restoring the amount gambled to the customer automatically, or in conjunction with manual operational controls; and	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10B a. ii.	implement all reasonable measures to maintain sufficient information to be capable of automatically restoring an event to its pre-failure state so that it may be completed by the customer. The following information should be restored, as appropriate: <ul style="list-style-type: none"> • the state of a deck of cards, and any hands that have been dealt • number of tokens collected • any other predetermined information, such as maps or prize layouts • the value of any progressive jackpots • the state of any gambles, e.g. who has staked what on what outcome • bets placed or offered. 	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 10B b.	For peer-to-peer betting, it should be possible to suspend betting markets manually or automatically.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 10C	Operators must make available information about their policies regarding service interruptions in various different circumstances.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 10C	Operators should make information available to customers about how they will be treated in various common scenarios. However, this does not mean that operators have to detail all possible scenarios or responses to service interruptions.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 11	To reduce the risk that cheating or collusion by players unfairly disadvantages another player and to inform customers about the risks posed.	
	Remarks/Findings: This is an explanatory text only.	

RTS requirement 11A	Measures intended to deter, prevent, and detect collusion and cheating must be implemented. Gambling systems must retain a record of relevant activities to facilitate investigation and be capable of suspending or disabling player accounts or player sessions. Operators must monitor the effectiveness of their policies and procedures.	Not Applicable
	Remarks/Findings: This is not a peer-to-peer game.	
RTS implementation guidance 11A a.	Relevant activities to be recorded will vary by game but may include:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A a. i.	which players played at which tables	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A a. ii.	the amounts won from and lost to accounts	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A a. iii.	game activities to an individual bet/action level.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A b.	Where appropriate, prevention measures may include:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A b. i.	taking steps to prevent a player from occupying more than one seat at any individual table.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A c.	Detection measures may include, detecting and investigating the following, where appropriate:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A c. i.	players who frequently share the same tables	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A c. ii.	players from same address who share the same table	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A c. iii.	suspicious patterns of play (such as chip dumping).	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A c. iv.	unusual gameplay statistics.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A d.	Customer complaints about cheating should be investigated.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A e.	Records should be kept of investigations which result in an account being closed including:	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 11A e.i.	player details (name, location, which licence the activity was in reliance on), scale of the offences (financial and number of players), time and date etc	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A e.ii.	the reason for investigation (including whether it was initiated by customer contact) and the outcome	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11A e.iii.	any relevant evidence such as reports, screenshots, chat history etc. This information should be considered when updating the risks identified in relevant policies and procedures.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 11B	Information must be made available about the operator's policies and procedures with regard to cheating, recovered player funds and about how to complain if a customer suspects other participants are cheating.	Not Applicable
	Remarks/Findings: This is not a peer-to-peer game.	
RTS implementation guidance 11B a.	As a minimum deterrent, customers should be informed that accounts will be closed if the customer is found to have cheated.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11B b.	Information regarding funds that are recovered from accounts during integrity investigations is not expected to cover every scenario but should highlight the main aims of the policy.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 11B c.	Relevant information should be included in terms and conditions or rules.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 12	To provide customers with facilities that may assist them in sticking to their personal budgets for gambling with the operator. Customers must be also be given the option to set financial limits at an account level.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 12A	The gambling system must provide easily accessible facilities that make it possible for customers to impose their own financial limits.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS requirement 12A (continued)	Customers must be given the opportunity to set a limit as part of the registration process (or at the point at which the customer makes the first deposit or payment).	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 12A a.	For telephone gambling (except lotteries), customers should be asked if they would like to set a deposit or spend limit when they register. Customers should be able to request a limit at any point after registration. The limit should be implemented as soon as practicable after the customer's request. The customer should be informed when the limit will come into force.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 12A b.	For other access media (including internet, interactive TV and mobile), customers should be offered the opportunity to select a deposit/spend limit from a list which may contain a 'no limit' option or to enter a limit of their choice as part of the registration or first deposit process. The 'no limit' option should not be the default option.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A c.	Limits could be in the form of:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A c. i.	deposit limits: where the amount a customer deposits into their account is limited over a particular duration	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A c. ii.	spend limits: where the amount a customer spends on gambling (or specific gambling products) is restricted for a given period – this type of limit may be appropriate where the customer does not hold a deposit account with the operator	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A c. iii.	loss limits: where the amount lost (i.e. winnings subtracted from the amount spent) is restricted (for instance when a customer makes a £10 bet and wins £8, the loss is £2).	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A d.	The period/duration of the limits on offer should include: i. 24 hours and ii. 7 days and iii. one month	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A e.	In addition:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A e. i.	limits may be implemented per customer, per account, or other means	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A e. ii.	limits could also be implemented across all products or channels or for individual products or channels. Where limits are also set across separate products it should be clear to customers using the facility that a limit will need to be set for each individual's product. For example, where a limit has been set for a specific game a customer should not be misled into assuming that the limit automatically applies to other products.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A e. iii.	financial limit facilities should be provided via a link on the home page	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 12A e. iv.	facilities should be available on deposit pages/screens or via a link on these pages/screens.	
	Remarks/Findings: This is an explanatory text only.	

RTS implementation guidance 12A e. v.	where a customer sets simultaneous time frames, for example a daily deposit limit and a weekly limit, the lowest limit should always apply. Therefore if a daily deposit limit of £10 and a weekly limit of £100 are both set then the maximum the system should allow to be deposited is £10 per day and £70 per week.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 12B	All reasonable steps must be taken to ensure that customer-led limits are only increased at the customer's request, only after a cooling-off period of 24 hours has elapsed and only once the customer has taken positive action at the end of the cooling off period to confirm their request.	Not Applicable
	Remarks/Findings: This is a game only test report. Platform functions have not been tested.	
RTS implementation guidance 12B a.	Where possible (for instance, unless systems/technical failures prevent it) limit reductions are to be implemented within 24 hours of the request being received. In addition, at the point at which the customer requests a decrease in their limit, they should be informed when the limit reduction will take effect.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 13	To provide customers with facilities to assist them to keep track of the time they spend gambling.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 13A	Where the gambling system uses full screen client applications that obscure the clock on the customer's device the client application itself must display the time of day or the elapsed time since the application was started, wherever practicable.	Not Applicable
	Remarks/Findings: The gambling system does not use full screen client applications.	
RTS implementation guidance 13A a.	Time of day should either be taken from the customer's own device or 'server time' and should be displayed in hours and minutes.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 13A b.	Operators will not be expected to detect whether or not customers have hidden their clocks.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 13A c.	Elapsed time should be displayed in minutes and hours.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 13A d.	For restricted display devices, time of day or elapsed time should be displayed where the device supports it.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 13A e.	In addition, customers may be offered the ability to set a session or game-play duration reminder.	
	Remarks/Findings: This is an explanatory text only.	

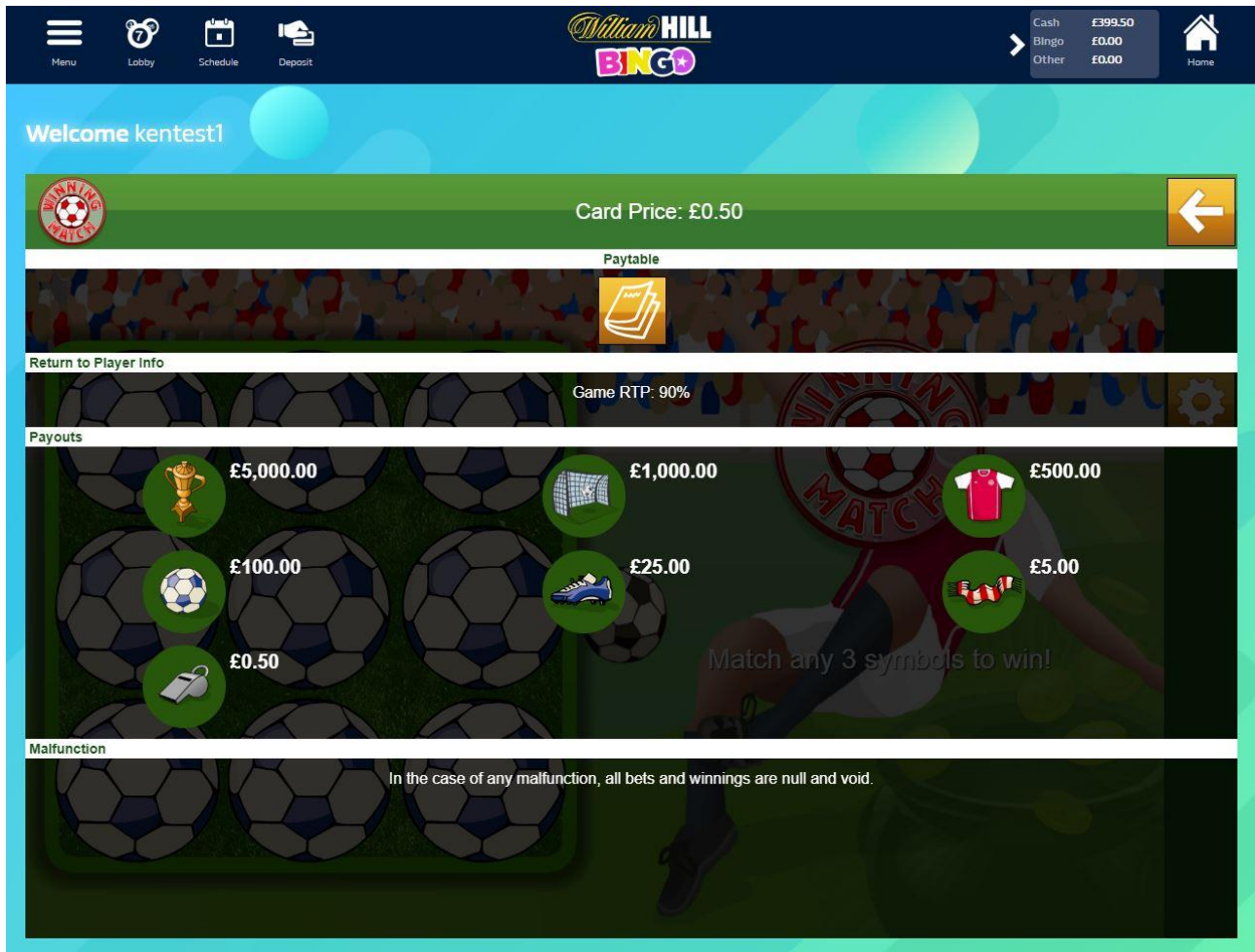
<p>RTS requirement 13B</p>	<p>The gambling system must provide easily accessible facilities that make it possible for customers to set a frequency at which they will receive and see on the screen a reality check within a gaming session. A 'reality check' means a display of the time elapsed since the session began. The customer must acknowledge the reality check for it to be removed from the screen.</p>	<p>Not Applicable</p>
<p>RTS implementation guidance 13B a.</p>	<p>The customer should be offered the opportunity to set or amend a reality check via easily accessible means at all times. Customers should be able to select a frequency at which the reality check will appear on the screen. Customers can be presented with a pre-set list time periods but these must have a reasonable and appropriate range from which to select and where a default time period is offered it must be set at the minimum</p>	
<p>RTS implementation guidance 13B b.</p>	<p>The reality check should continue to appear at the selected time intervals until the customer's gaming session ends (see definition of terms) or the customer exits their account (this will depend on solutions i ii iii below). If a customer is participating in multiple gaming sessions at once (eg playing bingo as well as participating in slots games in between draws) the gaming session began when the player commenced with the first product. The reality check facility could be implemented via one of the following ways:</p> <p>i. Player account level implementation. There are two potential solutions for account level implementation. The optimum approach would enable customers to set a reality check reminder for their account, which would commence at the start of the first gaming session and roll over to subsequent sessions. An alternative solution would be for the reality check to commence before a customer accesses a gaming session (eg at account log in stage). The second solution would meet the requirement although it would not take into account natural breaks in play, such as when customers are in the casino lobby.</p> <p>ii. Product level implementation. This approach will enable a customer to set a reality check for each individual gaming session, for example the player commences playing roulette and then later starts playing blackjack and has two reality checks running concurrently but covering different time periods.</p> <p>iii. Hybrid solution. Some games are subject one reality check and others are subject to another for example all slot games are subject to a single reality check and live dealer products are subject to a separate reality check.</p>	
<p>RTS implementation guidance 13B b. (continued)</p>	<p>A clear explanation of how the reality check is implemented must be provided to players so they are aware of how they can use it to assist them in managing their gambling. Where possible a player's preferences should be applied to all future account logins or gaming sessions (where applicable). If this is not possible players must be provided with clear information that explains that they will have to set a reality check for each account login or gaming session.</p>	
<p>RTS implementation guidance 13B c.</p>	<p>The reality check should offer the customer the facility to exit the gaming session or log out of their account (depending on which of the above solutions is adopted).</p>	
<p>RTS implementation guidance 13B d.</p>	<p>The reality check should provide a link to the customer's account history.</p>	

RTS implementation guidance 13B e.	The reality check can be presented at the end of a game but a player cannot be permitted to commit further funds to a new game until they have acknowledged the reality check, unless it occurs mid-way through a multi-state game such as blackjack where a player would need to commit additional funds if they wanted to split or double down.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 13B f.	The reality check must prevent a new game within an auto-play sequence from commencing until the player has acknowledged the reality check.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 14	To ensure that products are designed responsibly and to minimise the likelihood that they exploit or encourage problem gambling behaviour.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 14A	Gambling products must not actively encourage customers to chase their losses, increase their stake or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they wish to stop.	PASS
	Remarks/Findings: Customers are not actively encouraged to play.	
RTS implementation guidance 14A a.	By actively encourage, we mean the inclusion of specific features, functions or information that could reasonably be expected to encourage a greater likelihood of the behaviours described occurring. For example:	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 14A a. i.	the amount of funds taken into a product should not be topped up without the customer choosing to do so on each occasion, e.g. when a customer buys-in at a poker table they should have to choose to purchase more chips to play at the table - automatic re-buys should not be provided	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 14A a. ii.	written or graphical information should not encourage customers to try to win back their losses	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 14A a. iii.	customers who have chosen to exit a game should not be encouraged to continue playing by, for example, being offered a free game.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 14A b.	This requirement is not intended to prevent operators from offering special features or well-known games such as blackjack that allow customers to increase their stake on the occurrence of specific events (e.g. split).	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 15	To make the customer aware that they may not have the latest information available when betting on live events, and that they may be at a disadvantage to operators or other customers who have more up-to-date information.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 15A	Information must be made available that explains that 'live' TV or other broadcasts are delayed and that others may have more up-to-date information.	Not Applicable
	Remarks/Findings: The game does not support 'live' TV or other broadcasts.	

RTS requirement 15A (continued)	Main in-play betting pages must include this information where practicable.	Not Applicable
	Remarks/Findings: The game does not support 'live' TV or other broadcasts.	
RTS implementation guidance 15A a.	Brief information should be included on main in-play pages or screens, such as the in-running home page or screen. More detail should be provided in 'help' or 'how to' or other product pages or screens.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 15A b.	For telephone betting the information should be included in the general betting or product information that is made available to and/or sent out to customers.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 15A c.	Where a brief notice cannot be practicably included on the main pages or screens, the information should be provided on easily accessible 'help', 'how to' or other product pages or screens.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 16	To make customers in peer-to-peer gambling aware that they may be gambling against a software program (designed to automatically participate in gambling within certain parameters, sometimes referred to as a bot), or a human aided by third party software.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 16A	Where peer-to-peer customers may be gambling against programs deployed by other customers to play on their behalf, or customers assisted by third party software, information should be made available that describes that this is possible, and if it is against the operator's terms and conditions, how to report suspected use.	Not Applicable
	Remarks/Findings: This is not a peer-to-peer game.	
RTS implementation guidance 16A a.	The warning and information about how to complain should be included in game descriptions, rules, terms and conditions, 'help', 'how to play' or other general product information pages.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 16A b.	The warning should also inform customers that if they use a program to gamble on their behalf, other customers may be able to exploit it.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 16B	Operators must make it clear to players whether the use of third party software is permitted and if so which types. Operators that prohibit certain types of third party software must implement measures intended to deter, prevent, and detect their use.	Not Applicable
	Remarks/Findings: This is not a peer-to-peer game.	
RTS implementation guidance 16B	Clear, accessible information about the types of software that are permitted or prohibited should be included within terms and conditions and the players guide (LCCP Social responsibility code 4.2.3), as a minimum. This does not have to be an extensive list but could be a description of the key features of the software.	
	Remarks/Findings: This is an explanatory text only.	

RTS requirement 16C	Where operators use programs to participate in gambling on their behalf in peer-to-peer gambling, easily accessible information must be displayed, which clearly informs customers that the operator uses this kind of software.	Not Applicable
	Remarks/Findings: This is not a peer-to-peer game.	
RTS implementation guidance 16C a.	Peer-to-peer(s) gambling operators that use software to gamble on their behalf (for example, poker robots) should display a notice to customers on the home pages or screens and in the game description, 'help' or 'how to play/bet' pages or screens.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 16C b.	As a minimum, restricted display devices should provide a link to further information on gambling pages/screens or in 'help', 'about' or 'how to bet/play' pages or screens.	
	Remarks/Findings: This is an explanatory text only.	
RTS aim 17	To ensure that live dealer operations are fair.	
	Remarks/Findings: This is an explanatory text only.	
RTS requirement 17A	Live dealer operations must be fair and independently auditable.	Not Applicable
	Remarks/Findings: This is not a live dealer game.	
RTS implementation guidance 17A a.	Equipment and consumables should be of commercial casino quality. Designated staff should be responsible for monitoring the integrity of all operational equipment.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 17A b.	Croupiers need to undergo adequate training to provide the gambling in a fair way according to documented procedures and game rules. Evidence of training and refresher training should be maintained.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 17A c.	Gambling provision should be supervised by staff responsible to oversee dealer activities and integrity. Video surveillance to record all dealer activity should be in place, enough to cover the predefined gaming areas with sufficient detail to confirm whether dealing procedures and game rules were followed.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 17A d.	Secure areas, gambling equipment and consumables shall be protected by appropriate access controls to ensure that only authorised personnel are allowed access.	
	Remarks/Findings: This is an explanatory text only.	
RTS implementation guidance 17A e.	Game logs should be maintained and game events collated into statistics which can be analysed for trends relating to game performance, staff and/or locations in the gaming area.	
	Remarks/Findings: This is an explanatory text only.	

APPENDIX A: Game rules



The screenshot shows the William Hill BINGO game interface for 'Winning Match'. The top navigation bar includes links for Menu, Lobby, Schedule, and Deposit, along with the William Hill BINGO logo and a balance summary (Cash: £399.50, Bingo: £0.00, Other: £0.00). A welcome message 'Welcome kentest1' is displayed. The game card shows a 'Card Price: £0.50' and a 'Paytable' section. The paytable lists various symbols and their corresponding payouts: a trophy for £5,000.00, a soccer ball for £1,000.00, a jersey for £500.00, a whistle for £100.00, a pair of shoes for £25.00, and a scarf for £5.00. A 'Return to Player Info' button is visible. The game RTP is 90%. A 'Malfunction' section states: 'In the case of any malfunction, all bets and winnings are null and void.' The background features a soccer field and a player.

APPENDIX B: Game software identification

Client side filename	SHA1
less-master.css	20512c338db254e485d b73f4f81b1912369e28 77

Server side filename	SHA1
betsure-base.properties	500326a34d6053ecaa2 b335720453f433ff176 5d
DefaultRNG.java	98306c88aa695325b5c 511a53dd8defb7ee32c e0
DefaultSecureRandom.java	bc8534375b561f580ba 6a1e1833f361d4a5128 28
GameConfig.java	84215ed04db14b723f4 f23297e6d5fcd252dc5 d7
RandomNumberGenerator.java	a438c442759f09a4d2a 172ce00642f311ac149 79
rng.properties	a3e8d9af3d1af890449 e010efbefb8891aac23 de
ScratchCardBean.java	b8518474fc13c12866b 7aa559bfa1dd6cef20d f7
ScratchCardConfig.java	d2d54cb4530f1fac943 2cd61852d591578a60b f6
ScratchCardLogic.java	72f7108ba027c9dad66 5f86442017f0f3d6b6b 8f
ScratchCardResult.java	1bf91920d8ffc97051d cf0ee56faab7c2d6671 31