

**Evaluation Report for:**  
**Eyecon Alderney Limited**  
**EYECON Gaming Products (2 Online Games)**

|                           |                                |
|---------------------------|--------------------------------|
| <b>Manufacturer:</b>      | <b>Eyecon Alderney Limited</b> |
| <b>ATF Report Number:</b> | <b>GIB.EYECON.1009.01.02</b>   |
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**BMM Spain Testlabs, s.l.u.**

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## EVALUATION REPORT

|  |   |
|--|---|
| <b>Client name &amp; Address:</b>              | Eyecon Alderney Limited<br>Inchalla, Le Val<br>Alderney GY9 3UL   |
| <b>Client Reference Number:</b>                | Client Submission Letter Dated 21 <sup>st</sup> October 2019  |
| <b>Testing dates:</b>                          | Start date: 25 <sup>th</sup> November 2019<br>End date: 31 <sup>st</sup> January 2020   |
| <b>Product / Game Description:</b>             | Eyecon Gaming Products (2 Online Games)   |
| <b>Test Category:</b>                          | Category 0  |
| <b>Jurisdictions Recommended:</b>              | Gibraltar   |
| <b>Technical Standard used for Evaluation:</b> | Remote Technical and Operating Standards for the Gibraltar Gambling Industry Version 1.1.0 20/09/2012   |
| <b>Location where test was performed:</b>      | BMM Spain Testlabs s.l.u.<br>Edificio Vinson del Parque Empresarial Vallsolana<br>Camí de Can Camps, 17-19<br>08174 Sant Cugat del Vallés<br>Barcelona (España) |
| <b>Location where report was issued:</b>       | BMM Spain Testlabs s.l.u.<br>Edificio Vinson del Parque Empresarial Vallsolana<br>Camí de Can Camps, 17-19<br>08174 Sant Cugat del Vallés<br>Barcelona (España) |
| <b>Conclusion:</b>                             | Pass  |
| <b>BMM Reference Number:</b>                   | EYECON.1009   |
| <b>Method/Procedures used:</b>                 | EURSAM-SPA-MO-04 V4.4   |
| <b>Consultant(s):</b>                          | Gerard Moreno, Enric Ferrés   |

## 1. SCOPE OF EVALUATION.

Eyecon Alderney Limited requested BMM Spain Testlabs s.l.u. to evaluate Eyecon Gaming Products (2 Online Games), the online platform/online game for operation in the relevant below Gibraltar market:

- Gibraltar, Remote Technical and Operating Standards for the Gibraltar Gambling Industry Version 1.1.0  
20/09/2012

## 2. EVALUATION CHARACTERISTICS.

### 2.1. GAME DESCRIPTION.

Game rules are contained in the help files accessible on the individual game play skin. There are two types of games evaluated by BMM: 'DH' and 'MH'. 'DH' type games are standard desktop games. 'MH' games are designed to run on Mobile phone and tablets; however, these games can still run on typical browsers.

#### 2.1.1. Heartburst (DH, MH) & Heartburst JP (DH, MH)

Heartburst is a 5-reel, 100-payline slot with expanding substitute and free games feature. Game can be configured to operate with or without additional Jackpot.

#### 2.1.2. White Wizard Deluxe (DH, MH)

White Wizard Deluxe is a 5-reel, 100-payline slot with expanding substitute and free games feature.

### 2.2. EVALUATED OBJECT IDENTIFICATION.

| Game Name           | Description | File Name   | SHA-1 Signature                              |
|---------------------|-------------|---|--|
| Heartburst DH       | Client      | slot-heartburst-2.0.10.zip                                | 91884CF429BD36CB5E863A074D958E59C6<br>F3984D |
|                     | Rules       | carbine-slots_heartburst_95_standard-<br>3.1.6-config.jar | B8AB5CEDD051EE41903AE005044A397C2<br>05AFF37 |
| Heartburst DH<br>JP | Client      | slot-heartburst-2.0.10.zip                                | 91884CF429BD36CB5E863A074D958E59C6<br>F3984D |
|                     | Rules       | carbine-slots_heartburst_92_jackpot-<br>3.1.6-config.jar  | 8EB43382AB07F4EE27B324438188F147D8<br>BCC058 |
| Heartburst MH       | Client      | slot-heartburst-5.0.17.zip                                | A645C7921EC2D7C366DA68330AC8D12C1<br>178CFB9 |
|                     | Rules       | carbine-slots_heartburst_95_standard-<br>3.1.6-config.jar | B8AB5CEDD051EE41903AE005044A397C2<br>05AFF37 |
| Heartburst MH<br>JP | Client      | slot-heartburst-5.0.17.zip                                | A645C7921EC2D7C366DA68330AC8D12C1<br>178CFB9 |
|                     | Rules       | carbine-slots_heartburst_92_jackpot-                      | 8EB43382AB07F4EE27B324438188F147D8           |

| Game Name              | Description | File Name  | SHA-1 Signature                              |
|------------------------|-------------|--|--|
|                        |             | 3.1.6-config.jar   | BCC058                                       |
| White Wizard Deluxe DH | Client      | slot-white-wizard-deluxe-2.0.8.zip                           | 2DF9C43AF90BB8F5BFB0284F26909F5198<br>CF0B46 |
|                        | Rules       | carbine-slots_whiteWizardDeluxe_95_standard-3.1.4-config.jar | 2D07411C678D6822FF4B25194B4B04E2EB<br>31A3B0 |
| White Wizard Deluxe MH | Client      | slot-white-wizard-deluxe-5.0.6.zip                           | CE2691815D47432E42CC7FB73713895CC7<br>91F5C5 |
|                        | Rules       | carbine-slots_whiteWizardDeluxe_95_standard-3.1.4-config.jar | 2D07411C678D6822FF4B25194B4B04E2EB<br>31A3B0 |

### 2.3. GAME PERCENTAGE VARIATION DETAILS.

| Game Name              | Game Variation | BMM Results   |              | CLIENT RESULTS |              | Certification / Approval ID |
|------------------------|----------------|---------------|--------------|----------------|--------------|-----------------------------|
|                        |                | % RTP Minimum | %RTP Maximum | % RTP Minimum  | %RTP Maximum |                             |
| Heartburst DH          | 95%            | 95.63%        | 95.63%       | 95.631%        | 95.631%      | *                           |
| Heartburst MH          | 95%            | 95.63%        | 95.63%       | 95.631%        | 95.631%      |                             |
| Heartburst DH JP       | 92%            | 92.07%        | 92.07%       | 92.067%        | 92.067%      |                             |
| Heartburst MH JP       | 92%            | 92.07%        | 92.07%       | 92.067%        | 92.067%      |                             |
| White Wizard Deluxe DH | 95%            | 95.63%        | 95.63%       | 95.631%        | 95.631%      |                             |
| White Wizard Deluxe MH | 95%            | 95.63%        | 95.63%       | 95.631%        | 95.631%      |                             |

**Note: (\*) denotes items under test**

### 3. BMM EVALUATION PERFORMED.

BMM Spain Testlabs s.l.u. has tested the new Eyecon Alderney Limited software Eyecon Gaming Products (2 Online Games), against the relevant requirements of the Gibraltar online market:

| Remote Technical and Operating Standards for the Gibraltar Gambling Industry Version 1.1.0 20/09/2012   | Results                  |                          |   |
|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| <b>2.Registration of participants and administration</b>  |                          |                          |   |
| <b>2.1 Registration Principles</b>  |                          |                          |   |
| 2.1(3) To elicit accurate and reliable personal data from prospective participants, registration pages should:<br><br>a) Include information on registration pages e.g. tag/tabs, notices, instructions, etc. to remind participants of the need for accuracy and of the value of using personal data consistent with existing official documents or records that may in due course be checked electronically or manually.                        | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.1(3)b) Advise customers that the withdrawal of deposits or winnings may not be permitted until further identity verification processes have been satisfactorily concluded.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.1(4) Licence holders should ensure their registration process elicits and records all available „background“ information („electronic footprint“) in respect of registered customers and persons making substantive attempts to register as customers (e.g. registrations submitted to the licence holder.) This may include personal data, country of location, IP address, computer identifier, cookie and any other relevant technical data. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.1(5) The customer registration process should include the customer's recorded acknowledgement and agreement to the  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| operator's terms and conditions and privacy policy (including a record of any deferred or directed access to the T&C available to customers opening account through „restricted access devices“ such as small screen mobile phones or PDA"s).   |                          |                          |   |
| 2.1(6) Terms and conditions should provide a full explanation of the conditions applicable to the registration process, including but not limited to: the number of accounts permitted, the prohibition of proxy, nominee or anonymous accounts, the identity and verification process, and the operator's right to void or terminate the account.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>2.2 Age and Identity Verification of Registered Participants</b>   |                          |                          |   |
| 2.2 (1) A licence holder should take reasonable steps to validate registration details of customers for age, security and responsible gambling purposes. The means to achieve this may differ depending on the information that is available in respect of customers in different jurisdictions. At the point of registration/first time deposit, or on transfer from „free play“, a licence holder should perform identity verification checks against third party databases as and where possible, as well as against internal records and system checks. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.2 (2) Licence holders should engage with electronic verification services, where these are available and add value, in order to verify registration details and identify both errors in data entries or deliberate attempts to mislead operators.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.2 (3) Licence holders should use and develop the means to search and cross  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the                     |

| Remote Technical and Operating Standards<br>for the Gibraltar Gambling Industry Version<br>1.1.0 20/09/2012  | Results                  |                          |   |
|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| check registration, technical and financial data to identify associations between accounts and attempts to open accounts. Such data may be used positively, to verify and identify participants, as well as defensively for security purposes.   |                          |                          | game functionality.   |
| 2.2 (4) Where invalid data, missing information, and/or inconsistencies are identified in depositing accounts these should be reviewed on a risk-based approach, but especially when other alerts are apparent. Pending any necessary clarification and verification, if significant inconsistencies are identified and are considered "higher-risk" in terms of the veracity of the customer, peer to peer gambling should not be allowed. All other forms of gambling should be subject to additional supervision/monitoring until identification is verified. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.2 (5) The Commissioner recognises that there are differing degrees of „pass“ and „fail“ in online registration and verification and it often takes time and secondary processes to resolve matters that for some individuals or in some states, are almost instantaneous. Consequently, it is accepted that „unsuccessful“ should be regarded as „fail“ only when there is definitive evidence to support that conclusion.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>2.3 Account transactions, administration and security</b>   |                          |                          |   |
| 2.3 (1) a) The licence holder should maintain a record of the following customer account information:<br><br>a) Customer identity details (including customer identity verification results),  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| 2.3 (1) b) Account identity details (including changes to these details),   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (1) c) Any self/operator-imposed gambling management measures (including uses of exclusion, limits and duration),   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (1) d) Details of any previous or related accounts, including reasons for deactivation  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (1) e) Deposit / withdrawal history, and current balance  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (1) f) Gambling event and transaction history (see guideline below).  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) a) A customer's gambling event and transaction history is an important part of the account information that should be securely recorded, consistent with data protection obligations. Licence holders should be able to recover comprehensive account transaction information which should include, as appropriate:<br>a) customer id., | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) b) event id,  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) c) session start and end time,  |                          |                          |   |
| 2.3 (2) d) customer device details (e.g. IP address, computer id, cookies, as available),   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |



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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 2.3 (2) e) session's wager(s) (time-stamped),  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) f) event results (e.g. win \$100, lose \$100)  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) g) The display/symbols/result e.g. card, dice, score, etc. determining the final outcome of the event, | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) h) choices made by customer,   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) i) total monies wagered for session,   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) j) total monies won for session,   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) k) funds added to account for session (time-stamped),  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) l) funds withdrawn from account for session (time-stamped),  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) m) account balance at start and end of session,  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) n) event status (complete, in progress, etc.)  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 2.3 (2) o) credits/bonus features awarded in play.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (2) All customer account transactions should be uniquely identifiable and securely maintained in a system audit log.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (3) Access to any account should be controlled by the use of a designated user identification name and password or similar secure arrangement. The customer should be required to demonstrate their identity in order to access the gambling services provided by the licence holder or information about their account. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) a) The license holder should have account security controls in place such as, but not limited to, the following:<br>Any operator generated password should be issued to the customer using a recognised secure method.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) b) A secure process should be established for passwords to be reset/re-issued to customers. This process could include:  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) b) i) - requiring the customer to provide answers to "challenge questions  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) b) ii)- issuing the password by means that only the customer should have access to it.; or   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) b) iii) - requiring the customer to demonstrate their identity by other means.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 2.3 (4) c) All customer accounts (including dormant or suspended accounts) should be secured against unauthorised access or update. This includes unauthorised internal access (e.g. by operator staff) and unauthorised external access (e.g. by malicious intruders).  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) d) Where appropriate, the operator should be able to implement a user inactivity timeout to log the customer out and/or end the customer's session after a specified period of inactivity.<br><br>The operator should advise the customer of the importance of keeping their account details security. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (4) e) The operator should advise the customer of the importance of keeping their account details secure.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (5) Adequate backups of customer account transactions should occur in order to ensure all customer account balances can be recovered in the event of any system failure rendering the gambling system inoperable.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (6) Each customer should be permitted to have only one active account at a time, or an operator should be able to link multiple brand accounts to that individual.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.3 (7) A licence holder should have a system in place to record each customer login time and, where applicable, log out/termination time. Notwithstanding that 'logged on' time is only a measure of system access and not use, this information should be demonstrable to the customer via his/her           | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| account history or upon request in the form of a schedule of their gaming sessions.  |                          |                          |   |
| <b>2.4 Customer transactions information and history</b>   |                          |                          |   |
| 2.4 (1) Customer account transactions should be recorded in a comprehensive, accurate, and intelligible manner. Licence holders should provide customers with direct remote access to their account history dating back for a minimum period of thirty days, with older material being made available on request as per terms and conditions.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (2) Where credits are displayed in game play, the customer's current account balance should be displayed in currency (as opposed to credits). Information on the credit to currency conversion should be clear and readily accessible. Telephone 2.4 Customer transactions information and history betting customers who do not have online access to account balance information, should be provided with their balance on request. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (2) Customer account transaction presentations should include sufficient information to allow the customer to reconcile the account transactions statement against their own financial records.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (3) a) Customers should be able to review at least their last game, either as a re-enactment or by description. The review process should clearly indicate that it is a replay of the previous game, and should make apparent:   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

| Remote Technical and Operating Standards<br>for the Gibraltar Gambling Industry Version<br>1.1.0 20/09/2012  | Results                  |                          |   |
|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| a) The date and time the game was played,  |                          |                          |   |
| 2.4 (3) b) b) The display/symbols e.g. dice results, cards, etc... associated with the final outcome of the game.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (3) c) c) Total customer cash / credits at start and end of play,  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (3) d) d) Amount gambled including any multipliers (e.g.: number of lines played, and cash /credits bet per line),   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (3) e) e) Total cash / credits won for the prize resulting from the last play (including progressive jackpots),  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (3) f) f) Any customer choices involved in the game outcome, and   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (3) g) g) Results of any intermediate game phases, such as gambles or feature games  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (4) a) Customers should be able to review their last bet (sports events etc.), have ready access to their recent betting history and be able to access their historic activity. This should include:<br><br>a) The date and time the bet was placed, | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (4) b) The details of the bet (event, value, odds etc.),   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (4) c) Value won or lost, including any returned bet value or deducted 'bonus' bets.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the                     |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
|   |                          |                          | game functionality.   |
| 2.4 (4) d) Cumulative balance information (which may be qualified or require calculation.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.4 (5) Where odds are reduced between the first submission and final acceptance of a bet, a system record should be created which confirms adjusted odds were accepted.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>2.5 Customer deposits, balances and withdrawals</b>  |                          |                          |   |
| 2.5 (1) Payments to and from customers should be conducted according to a formal documented process.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (2) A customer should be able to access at any time a fair representation of the balance/value of an active account.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (3) Subject to any legitimate restrictions that may legitimately apply (e.g. ongoing security checks) a customer should be able to initiate the withdrawal of funds from his account at any time.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (4) A licence holder should ensure prompt and accurate processing of withdrawal requests, subject to appropriate and necessary checks and verifications. Processing should normally be completed within 5 working days (excluding weekends and bank holidays) of the conclusion of verifications. The payment method used by the customer may add to the time before a customer is actually in receipt of such funds. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (5) Licence holders should provide a description of the withdrawal process in   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the                     |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| their terms and conditions (or other appropriate place) including a general description of the time normally taken to process withdrawals of different types.  |                          |                          | game functionality.   |
| 2.5 (6) Financial reconciliations performed for deposits, balances and withdrawals should be reviewed.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (7) Information about any currency conversion rates applicable to deposits, balances and withdrawals should be readily accessible from the operator's website.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (8) A customer should not be given credit for gaming (other than through the provision of a promotion or bonus). Where credit accounts are permitted operators must apply recognised credit models and risk assessment processes.                                    | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (9) The detection and correction of timeout receipts (disrupted transaction processing) should be conducted in accordance with a documented process.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (10) Account related customer queries should be promptly addressed.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.5 (11) The licence holder's liability for customer balances, pending withdrawals and guaranteed prizes should be separately identifiable at any point in time, and operators should be able to demonstrate sufficient cash and cash equivalents to pay these balances. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>2.6 Dormant Accounts</b>  |                          |                          |   |
| 2.6 (1) Inactive accounts (no customer transactions) require additional supervision  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the                     |

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|   | OK                       | Fail                     | Observations  |
| and protection. Inactive accounts may be deemed dormant accounts subject to administrative/management charges only after a period as specified in terms and conditions.   |                          |                          | game functionality.   |
| 2.6 (2) Licence holders should review and manage all inactive accounts, and should attempt to contact customers, including written correspondence, before an account is made dormant and subject to administrative charges. Where the operator imposes dormant account charges, these should be proportionate to the cost of the management and administrative efforts made to contact the customer. Attempts to contact the customer should make clear the licence holder's dormant account policy and administrative charges. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.6 (3) A licence holder should give at least 14 days written notice to the customer before the account is deemed dormant and is subject to deductions/charges.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.6 (4) The efforts to contact the customer should be proportionate to the value of the account balance; accounts should not be 'zeroed' until the conclusion of the dormant account policy.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.6 (5) A licence holder's dormant account policy should be included in the terms and conditions and be readily accessible on licence holders' websites.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.6 (6) Where an account becomes dormant and dormant account charges have been imposed, the customer should be able to apply to recover the balance of their account. Administrative charges may be reimbursed at the licence holder's discretion.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |



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|  | OK                       | Fail                     | Observations  |
| 2.6 (7) Licence holders should have a process to establish and deal with bona fide third-party claims in respect of dormant accounts involving alleged bereavement or incapacity.                    | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>2.7 Account suspension</b>  |                          |                          |   |
| 2.7 (1) Suspension of accounts should be through a process documented in the terms and conditions.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.7 (2) Account balances in suspended accounts must be subject to ongoing supervision and reconciliations to prevent internal fraud or unauthorised access.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.7 (3) Any uncontested funds should be remitted to the customer on request, subject to substantive identity and security checks.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 2.7 (4) Contested funds should be retained by the operator pending any legal process or investigation to determine their disposal.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>3 Presentation of Rules and customer information</b>  |                          |                          |   |
| <b>3.1 General</b>   |                          |                          |   |
| Rules or information published or presented to the customer in any form e.g. visual, auditory, written, pictorial:<br>3.1 (1) a) Should be accurate, intelligible, and unambiguous (not misleading). | ✓                        | <input type="checkbox"/> |   |
| 3.1 (1) b) Should be reviewed where they are found to be open to misunderstanding or misinterpretation on a recurring basis.   | ✓                        | <input type="checkbox"/> |   |
| 3.1 (1) c) Should be accessible from the home page or any presentation of access to  | ✓                        | <input type="checkbox"/> |   |

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|  | OK                       | Fail                     | Observations  |
| 'd) Terms and Conditions' as a live link.  |                          |                          |   |
| 3.1 (1) d) Should be legible and in a recoverable format (e.g. to print or save).  | ✓                        | <input type="checkbox"/> |   |
| 3.1 (1) e) Should be fit for purpose in terms of the issues generated by the licence holder's business model, product offers and customer activities likely to be contended.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>3.2 Terms and Conditions</b>  |                          |                          |   |
| Where it is not possible to present the full terms and conditions to the customer at the point of registration, for example, for telephone betting and mobile gambling, customers should be advised at the time of registration how to access the operator's terms and conditions. Terms and conditions may, for example, be made available on the operator's website and/or be delivered by post and/or email.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.2 (2) A licence holder should have a privacy policy that is stated in a clear and intelligible manner readily accessible on their web site(s), and which should at least refer to:<br><br>3.2 (2) a) The minimum information that is required to be collected, the purpose for information collection, the conditions under which information may be disclosed and the controls in place to prevent the unauthorised or unnecessary disclosure of the information. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.2 (2) b) The extent to which the licence holder, authorised external agencies, licensing, and regulatory staff, have access to their account information.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 3.2 (2) c) Where it is not possible to present the privacy policy to the customer at the point of registration, for example, for telephone betting, customers should be advised how to access the policy.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.2 (2) d) Where the operator intends to use data for purposes not directly related to the offering of a gambling product (e.g. for inclusion in a mailing list), additional specific consent should be granted by the customer. Withholding this type of consent should not be used as grounds to refuse to conduct business with a person.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.2 (3) The terms and conditions should clearly define the licence holder's policies in respect of malfunctions of gambling hardware / software.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.2 (4) A licence holder's terms and conditions and underage gambling policy should state that no person under 18 or the minimum permitted age is permitted to participate in remote gambling with the licence holder. Reference shall be made to the licence holder's underage gambling policy; the underage gambling policy shall clearly state the procedure applicable in the event that an underage individual is identified. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| Where remote gambling is provided in different languages:<br><br>3.2 (5) a) The terms and conditions and game information should be provided in the language specified for that version.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.2 (5) b) The terms and conditions and game information should carry the same meaning across all language versions so that no one version is advantaged or  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| disadvantaged.   |                          |                          |   |
| 3.2 (6) The licence holder's website terms and conditions should state that only customers legally permitted can participate in gambling activities.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.3 Safeguarding of information  |                          |                          |   |
| 3.3 (1) Customer credit card numbers stored on the system should be secured from unauthorized use.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.3 (2) Permanent and temporary employment contracts and commercial contracts permitting access to confidential data should contain a "confidentiality" clause prohibiting the unauthorized or unnecessary disclosure of customer information.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.4 Game rules and information   |                          |                          |   |
| 3.4 (3) For each game, the licence holder's game rules and information should be readily accessible and identifiable in a clear and intelligible manner by way of a conspicuous link to the game rules on the home pages for gaming products, game selection screens/menus, and within individual games. | ✓                        | <input type="checkbox"/> |   |
| 3.4 (4) The game rules should not be unfair or misleading  | ✓                        | <input type="checkbox"/> |   |
| 3.4 (5) The availability of game rules and information should be checked regularly; if the information is not available the game should not be made available for gambling.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| The published game rules and information should be sufficient to explain to customers  | ✓                        | <input type="checkbox"/> |   |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| all of the applicable rules and how to participate. As applicable, game information should include the following:<br>3.4 (6) a) the name of the game;   |                          |                          |   |
| 3.4 (6) b) the applicable rules, including clear descriptions of what constitutes a winning outcome;  | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) c) any restrictions on play or betting, such as any play duration limits, maximum win values, bet limits, etc;  | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) d) the number of decks or frequency of shuffles in a virtual card game;   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope not testing a card game.          |
| 3.4 (6) e) 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  | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) f) instructions on how to interact with the game; and   | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) g) any 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 where they differ from the main game. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope not testing a Metamorphosis game. |
| 3.4 (6) h) Information about the likelihood of winning.   | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) h) i) a description of the way the game works and the way in which winners are determined and prizes allocated;   | ✓                        | <input type="checkbox"/> |   |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| 3.4 (6) h) ii) For each game, information about the potential prizes and/or payouts (including the means by which these are calculated) should be easily available. This should include, where applicable                                     | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) h) ii) 1) Pay tables, or the odds paid for particular outcomes.   | ✓                        | <input type="checkbox"/> |   |
| 3.4 (6) h) ii) 2) 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 charged.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Peer to Peer game. |
| 3.4 (6) h) ii) 3) 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. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a lottery game.      |
| 3.4 (6) h) ii) 4) Displays of jackpot amounts that change over time ("progressives") should be regularly updated and as soon as possible after the jackpot has been reset following a win.  | ✓                        | <input type="checkbox"/> |   |
| The following information should be displayed on the game's interface for each game:<br>3.4 (7) a) The name of the game.  | ✓                        | <input type="checkbox"/> |   |
| 3.4 (7) b) The game should display the unit and total stake for the customer's gamble including conversions to currencies or tokens.  | ✓                        | <input type="checkbox"/> |   |
| 3.4 (7) c) The information displayed about the game result should be sufficient for the customer to determine whether they have   | ✓                        | <input type="checkbox"/> |   |

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|--|--------------------------|--------------------------|--|
|  | OK                       | Fail                     | Observations   |
| lost or won and the value of any winnings.   |                          |                          |  |
| 3.4 (7) d) The game should display the result of every game in which the customer participates for a reasonable period of time, that is, sufficient time for the customer to be able to understand the result of the game in the context of their gamble.  | ✓                        | <input type="checkbox"/> |  |
| For multi-state or metamorphic games, as the game progresses clear information sufficient to inform the customer about the current state of the game should be displayed on screen in text and/or artwork. For example:<br><br>3.4 (8) a) where a game builds up a collection of tokens (symbols, etc) the current number collected should be displayed, | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Metamorphic game. |
| 3.4 (8) b) where different rules apply an indication of the rules that are currently relevant, such as “bonus round” or other feature labels   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Metamorphic game. |
| 3.4 (9) The game rules (or terms and conditions) should cater for situations where the licence holder loses connectivity with the customer and how such customers will not be unfairly disadvantaged   | ✓                        | <input type="checkbox"/> |  |
| 3.4 (10) Game rules should be date stamped and previous versions should be made available to customers on request  | ✓                        | <input type="checkbox"/> |  |
| 3.4 (11) The general playing rules and the payout percentage for a particular game should be the same in free play mode as it is in the real money game  | ✓                        | <input type="checkbox"/> |  |
| 3.4 (12) Customers should be informed in   | <input type="checkbox"/> | <input type="checkbox"/> | N/A  |

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|   | OK                       | Fail                     | Observations   |
| any betting opportunity relying on 'live' monitoring of an event (e.g. betting in play) that 'live' transmissions may be subject to delay or interruption. Where a delay is apparent to the licence holder, or is created by the licence holder, the scale of the delay should be made apparent to the customer   |                          |                          | Out of testing scope, not testing a live betting.  |
| 3.4 (13) Where any information about the progress of a betting event is made available to customers via an operator's website, the status and reliability of that information in terms of any future betting decisions by customers should be made readily apparent to the customer   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality.  |
| 3.5 Jackpots  |                          |                          |  |
| 3.5 (1) Where a simultaneous win, or the appearance of a simultaneous win, is possible, the rules of the game should include the possibility and the means of resolving this possibility  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, jackpot has been tested before for this game.   |
| 3.6 Multi-customer games  |                          |                          |  |
| 3.6 (1) Where the licence holder uses programs to participate in gambling on their behalf in peer-to-peer gambling (e.g. "robots"), information should be displayed which clearly informs customers that the licence holder uses this kind of software. The use of 'bots' is not encouraged and should be made apparent to customers if they are deployed | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality of a slot online casino game with no multi customer gaming. |
| 3.6 (2) Customers should be made aware that other customers may use bots or programmes. This information should be available on the game rules or terms and conditions and should warn customers of the risks of gambling against robots and of   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality of a slot online casino game with no multi customer gaming. |



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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| using robots themselves, that is, that the predictability of robots may be exploited by other customers   |                          |                          |   |
| 3.6 (3) Information should be made easily available on how customers should report suspected robot use and such reports should be properly investigated, and operators should adopt appropriate technology to detect and investigate robot use.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality of a slot online casino game with no multi customer gaming.              |
| 3.6 (4) Customers should be informed on the game rules where performance characteristics of networks or end-user devices (e.g. speed of connection or processor) may have, or may appear to have, an effect on the game, such as in decision making where speed is a factor, the update of progressive jackpot values or disconnection from multi-player games. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality of a slot online casino game with no multi customer gaming.              |
| <b>3.7 Monitoring of Rules</b>  |                          |                          |   |
| 3.7 (1) Licence holders should review and amend any terms and conditions that are found to cause confusion amongst customers.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. Terms and conditions will be available on the casino Operators website. |
| 3.7 (2) Licence holders should notify customers via written correspondence and/or on-screen advice when any significant terms and conditions are changed. Such notification may be general or selective, as appropriate. Records should be kept as to how and when such notifications were managed.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. Terms and conditions will be available on the casino Operators website. |
| 3.7 (3) Applicable game rules and/or information should not be changed during a session unless adequate advance notification is given to customer. (e.g. where  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. Terms and conditions will be available on the                           |

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|  | OK                       | Fail                     | Observations  |
| customers have incomplete games, etc.  |                          |                          | casino Operators website.   |
| 3.7 (4) Applicable game rules and/or information should not be changed between a customer making a bet and the result of the bet being generated and calculated unless the customer was aware of the change before the bet was made. For jackpots, parameters should not be altered outside stated T&C's once customer(s) have contributed to the jackpot.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. Terms and conditions will be available on the casino Operators website. |
| 3.7 (5) Changes to rules and pay tables should not be retrospective in their effect. Generally, and wherever possible, changes should be applied when the facility is inactive or deactivated and be readily apparent to any customer returning to a facility.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. Terms and conditions will be available on the casino Operators website. |
| <b>3.8 Licensing information to be displayed on webpages</b>   |                          |                          |   |
| 3.8 (1) Due to the changing practices of different jurisdictions and both properly licensed and unlicensed operators, and to better protect the reputation of Gibraltar and its licensees, licence holders should present their licenced and regulatory status to customers clearly and consistently and not in ways that may lead customers to be confused as to the extent or nature of their licensed status. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality.   |
| Licence holders should include on the primary webpages and landing pages of the licence holders' Gibraltar licensed products:<br>3.8 (2) a) as a footer, the information stated in section 16.1 of the Generic Code, i.e. Operator Name and Address is licensed by the Government of Gibraltar Licence Number XX (optional) and is regulated by  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality.   |

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|  | OK                       | Fail                     | Observations  |
| the Gibraltar Gambling Commissioner.   |                          |                          |   |
| 3.8 (2) b) Government of Gibraltar Gambling Division web links.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 3.8 (3) White label and platform partner web pages should provide a conspicuous link to information that accurately describes the relationship between the licence holder and the co-owner/co-controller of the relevant web pages. (See Standard 13.2(4)).  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>4 Responsible Gambling awareness and provision of information</b>   |                          |                          |   |
| <b>4.3 Awareness of responsible gambling</b>   |                          |                          |   |
| Notwithstanding the varied structure of licence holders' online products, the home page of licence holder's website(s) and downloaded gambling software should have a direct link to a responsible gambling website/webpage operated and maintained by or on behalf of the licence holder that:<br><br>4.3 (1) a) Provides a statement of the licence holder's commitment to responsible gambling. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) b) Provides details of the licence holder's responsible gambling policy.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) c) Advises on responsible gambling practices and encourages customers to gamble responsibly  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) d) Advises on and provides a credible problem gambling self-assessment tool or process.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|  | OK                       | Fail                     | Observations  |
| 4.3 (1) e) Provides a link to and contact details (e.g. email and helpline number) of, at least one organisation dedicated to treating and/or assisting problem gamblers, should anyone be concerned about their own or someone else's gambling. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| f) Informs customers about and provides access to the licence holder's gambling management and/or customer protection facilities, such as  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) (f) i) deposit limit and other financial management facilities   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) (f) ii) time management facilities   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) (f) iii) time out periods  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (1) (f) iv) exclusion facilities   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (2) Responsible gambling information should be accessible via 'one click' from the home page and the customer registration pages and whilst gambling pages are accessed.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (3) Any 'Responsible Gambling' (or similarly named) link or logo or other indication of responsible gambling advice, should give direct access ('one click') to that advice.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|  | OK                       | Fail                     | Observations  |
| 4.3 (4) Unless deemed inappropriate, direct written communication (e.g. post/mail, email, etc...) with the customer should carry a statement that encourages and/or reminds the customer to gamble responsibly.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| The gambling account management interface, particularly the deposit and withdrawal sections, should contain a direct hyperlink to the following:<br><br>4.3 (5) a) deposit limit and other gambling management facilities;   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (5) b) a conspicuous direct link to the licence holder's responsible gambling webpage/website.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (6) All links to the licence holder's responsible gambling webpage/site and links to responsible gambling organisations dedicated to assisting problem gamblers should be regularly tested by the licence holder. Where the service is no longer available or is not available for a significant period of time, the licence holder should to identify an alternative support service. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (7) A licence holder should not display commercial advertising or promotional material on their responsible gambling website and/or webpages.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (8) Messages of a licence holder's support for the provision of problem gambling treatment, research or education initiatives must be accurate and up to date.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.3 (9) Responsible gambling information including warnings on underage gambling   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the                     |

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|  | OK                       | Fail                     | Observations  |
| should also be accessible from the 'free play' website presentations as per the real money version.  |                          |                          | game functionality.   |
| <b>4.4 Responsible marketing</b>   |                          |                          |   |
| 4.4 (1) Advertisements should contain factually correct information and should not be false or misleading, particularly with regard to customer winnings.                                      | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (2) Advertisements should not entice underage individuals to gamble, and should not be displayed in media that is clearly targeted at underage individuals.                                | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (3) Customers should not be encouraged to chase their losses or re-invest their winnings and at no time should it be suggested that gambling is a means of solving financial difficulties. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (4) Advertisements and promotional content should be within the spirit of responsible gambling.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (5) Terms and conditions applicable to promotional activities should be clearly displayed, including start and end dates, and should not be unreasonably altered during the promotion.     | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (6) Direct advertisements and promotional communication should carry an age restriction warning where practical  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (7) Email, SMS and bonus advertisements should have an unsubscribe, or opt out, facility   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|  | OK                       | Fail                     | Observations  |
| 4.4 (8) The licence holder should not abuse its relationship with the customer by any unauthorized activity on the customer's computer system  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (9) Licence holders should ensure that any affiliate and/or third-party performing advertisements or undertaking other forms of marketing on their behalf is aware of and is willing to take appropriate steps to abide by S.4.4 of the RTOS   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.4 (10) If the licence holder becomes aware of an affiliate and/or third party behaving in a manner that contravenes the RTOS and/or other Gambling laws or, the licence holder should take reasonable steps to ensure that the affiliate ceases that behaviour or that the affiliate and/or third-party contract is terminated   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 4.5 Use of local languages   |                          |                          |   |
| 4.5 (1) Responsible gambling facilities and customer information should be offered in the language(s) the licence holder provides its remote gambling website(s) and services.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5 Gambling management facilities   |                          |                          |   |
| 5.1 Financial and time management limits   |                          |                          |   |
| 5.1 (1) Irrespective of where the customer is located, he or she should be provided with the opportunity and tools to help them monitor, manage and control their gambling behaviour. A licence holder's procedures for implementing its Gambling Management facilities should be readily accessible and clearly communicated on the licence holder's website(s). In the case of telephone | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|  | OK                       | Fail                     | Observations  |
| gambling the information should be made available by contacting the licence holder's customer service representatives, and where necessary should be made available in writing.  |                          |                          |   |
| 5.1 (2) The Gambling Management procedures should clearly state the arrangements for setting a gambling management facility and make clear that for a gambling management facility to be implemented the costumer is required to follow the gambling management implementation procedures. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (3) Customer should have the ability to set a gambling management facility (deposits or time) as part of the registration process or at the point at which the customer makes the first deposit.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (4) A licence holders' procedure for customers to initiate a gambling management facility should be user friendly and unambiguous.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| The gambling management facilities should include at least one of the following gambling management options:<br><br>5.1 (5) a) Deposit limit per time period – an overall maximum deposit limit over a specified period of time (e.g. daily, weekly, etc.)                                 | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (5) b) Time played reminder – a means for the customer to be reminded of the length of time he has been logged on to the gambling facilities.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (6) Except for gambling provided via mobile phones and devices with similar  | <input type="checkbox"/> | <input type="checkbox"/> | N/A   |



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|   | OK                       | Fail                     | Observations  |
| limited display capabilities, a clock displaying current time, local to the customer, should be clearly visible at all times. (This may be the PC clock, for example, found within the taskbar.) If for any reason the PC clock is automatically obscured by the game client, then the operator should add an onscreen clock as part of the service.                        |                          |                          | Out of testing scope, only testing the game functionality.        |
| The licence holder may set their own gambling management facility limits for customers, in which case:<br>5.1 (7) a) Customers should be informed of any such limits,   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (7) b) The lower of the two limits (self/imposed by licence holder) should always apply   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (8) Where a customer requests a limit to be reduced (reduced gambling), it should be implemented as soon as reasonably practicable given the circumstances and timing of the request. The request process should make the customer aware that any requested reduction in a limit will not be implemented until notification in writing has been issued to the customer. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (9) Customers should be able to impose the limit of their choice or a limit from a substantive range of preset limits. 'No limit' may be an option but should not be the default limit option/value.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| Once established by a customer, a request to increase a limit (increased gambling) should, generally, only be implemented after a 24-hour period. There may be circumstances however where a request to increase a limit(s) may be implemented  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|   | OK                       | Fail                     | Observations  |
| before 24 hours. In these cases:<br><br>5.1 (10) a) A trained manager should consider the request and allow the limit to be increased if he/she considers it appropriate. A trained manager is considered to be someone of appropriate seniority and appointed by the licence holder to make judgements and take responsibility for such decisions.   |                          |                          |   |
| 5.1 (10) b) A record of the request including details of the request, the manager(s) involved, the decision, and the reasons for the decision should be kept. Typically, such cases will involve established and unproblematic customers with an evident reason for increasing their limit.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.1 (11) Where gambling management facility fails and/or a registered customer is able to gamble beyond an agreed limit established with the licence holder, the licence holder should notify the Commissioner of the occurrence providing a description of the event and the cause of the failure and/or circumvention of the system.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>5.2 Access control facilities</b>  |                          |                          |   |
| Licence holders should have in place systems that enable a customer to request to be prevented from accessing a licence holder's gambling facilities. Licence holders should offer customers the following access control facilities:<br><br>5.2 (1) a) Time out: enable the customer to request a 'time out' period, up to 6 months. During the 'time out' period the licence holder should prevent further gambling | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|  | OK                       | Fail                     | Observations  |
| activities as agreed with the customer and make reasonable endeavours to prevent marketing to customers during the time out period.  |                          |                          |   |
| 5.2 (1) b) Self Exclusion: enable the customer to request Self Exclusion from the licence holders' facilities for a period of six months or more.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (2) Requests for access control should be recorded and implemented as soon as practicable. Whilst there should be no undue delay in implementing such requests, access control is open to misinterpretation and abuse. To minimise the possibility of disputes, such requests should be carefully administered.                                | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (3) A licence holder's description of its access control procedures should be readily accessible and clearly communicated on or from the licence holder's Responsible Gambling pages and make clear that it is an agreed, structured and documented process, even for telephone accounts, that takes a reasonable working period to implement. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (4) The documented process for the access control facilities should clearly state the different conditions for each facility. It should make clear that for any such facility to be implemented the customer must follow the clearly documented procedure, and that the licence holder will do likewise.                                       | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (5) Licence holders should consider making available to customers time out and exclusion periods for specific products e.g. sports book, casino, poker, bingo etc.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|   | OK                       | Fail                     | Observations  |
| 5.2 (6) The customer's request for Time Out or Self Exclusion should be implemented consistently across all brands and labels under the control of the licence holder.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (7) The Commissioner encourages licence holders to adopt implementation processes that minimise any ambiguity about whether a customer has sought access control, when it starts and finishes, the relevant sites/brands, the relevant conditions, including the required actions of the customer during the control period. (e.g. no duplicate accounts and self-management by the customer. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| Where a customer requests access control the licence holder should ensure that:<br>5.2 (8) a) There is a review of any previous access control requests and these are taken into consideration in determining the most appropriate response.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (8) b) As soon as reasonably practicable following the licence holder's processing of the request, no new bets or deposits are accepted from that customer, until such time as the control has expired or been removed.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (8) c) During the control period, the customer is not prevented from withdrawing any or all of their clear account balance.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (8) d) Where 'permanent' or 'open ended' self-exclusion is offered, the licence holder should ensure that the customer's account balance is remitted to the customer.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (8) e) In the event of six month or more exclusion, where the customer is identified  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the                     |

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|  | OK                       | Fail                     | Observations  |
| as wishing the resume gambling after the conclusion of the control period, the excluded customer should be invited to confirm to the licence holder via a documented process that they, wish to return from the exclusion before their account or the facility is re-instated.   |                          |                          | game functionality.   |
| 5.2 (8) f)) In the event of time out being taken by the customer the operator should impose a suspension of that account for the agreed period. Time out does not impose an obligation on the operator to 'lock out' the customer if he or she requests or decides to return to gambling or has other facilities. Then the Time out expires or is cancelled by the customer, a simpler means of returning to gambling, proportionate to the nature of the request, can be applied. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (9) Licence holders may decide to exclude a customer for responsible gambling reasons ('operator-imposed exclusion'), in which case a record should be kept of the assessment and decision made and any account balance remitted to the customer.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (10) A third party making an application for a customer's self exclusion should be properly identified by the operator. Taking into consideration Data Protection legislation, an appropriate manager should give due consideration to the appropriate course of action to be taken in response to such requests.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 5.2 (11) Licence holders should take all reasonable steps to prevent their own marketing material being sent to customers who are subject to substantive access control. Where the licence holder has provided customer personal data to third   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|   | OK                       | Fail                     | Observations  |
| parties similar steps should be taken to ensure that those third parties make arrangements to ensure that marketing material is controlled. It is recognised that up to or over 28 days may be needed to cancel future marketing plans.   |                          |                          |   |
| 5.2 (12) Where a self-excluded customer is able to breach the exclusion system and is subsequently detected, the reimbursement of deposits is at the licence holder's discretion and should take into account the history of the customer. Breaches to self exclusion should not be incentivised by the automatic reimbursement of deposits or the payment of winnings.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>6 Preventing underage Gambling</b>   |                          |                          |   |
| <b>6.1 Underage gambling warnings and information</b>   |                          |                          |   |
| 6.1 (1) Preventing underage access to gambling facilities is an ongoing process rather than a single activity. Licence holders are required to ensure that their marketing campaigns, including 'no prize' games, are not directed or specifically attractive to those below the minimum age to gamble. Additionally, the presentation and content of sites should not be designed to appeal to underage audiences, and sites should carry repeated warnings that those under the permitted age are not permitted to gamble, and that winnings are not paid out until age and identity have been formally verified. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| Terms and Conditions should make clear that underage gambling is not acceptable and that such attempts or activities are reported to the Gambling Commissioner who may refer the matter to the customer's local prosecution authorities.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|   | OK                       | Fail                     | Observations  |
| A licence holder should include on their websites a webpage dedicated to underage gambling that provides links to, and/or advises of:<br><br>6.1 (2) a) the licence holder's underage gambling policy;  |                          |                          |   |
| 6.1 (2) b) reputable filtering service providers such as Internet Content Rating Association (ICRA) Net Nanny, or Cyberpatrol to assist parents (or other) prevent access by persons under the minimum permitted age.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| The following web pages (or sections) of the licence holder's remote gambling website(s) and where applicable game client should display an obvious sign or hyperlink to the effect that persons under the minimum permitted age are not permitted to participate in the gambling activities provided by the licence holder, which links through to the licence holder's information addressing underage gambling.<br>6.1 (4) a) home page. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.1 (4) b) account registration pages, especially where the customer is required to affirm (s)he is of legal age to gamble.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.1 (4) c) responsible gambling website/webpage (see section 4.3(1)).   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.1 (4) d) the 'lobby' or 'entry' pages where username, password and other site access information is typically provided.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.1 (4) e) 'Log out' page or at the end of the gambling session when the customer uses the log out facility.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|  | OK                       | Fail                     | Observations  |
| <b>6.2 Age verification of registered participants</b>   |                          |                          |   |
| 6.2 (1) Age and customer verification should be conducted in accordance with a formally documented process.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (2) The registration process should include a positive age affirmation by the applicant as well as providing date of birth, e.g. over 18 check boxes.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (3) A licence holder should advise customers at an early stage in the registration process that identity documents may be required to verify the member's age and identity and release winnings.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (4) The majority of on-line payment methods are directed at and accessible by over 18s so offer limited risk of underage gambling. Licence holders should concentrate resources and attention on those payment methods that are accessible to persons under the age of 18. Pre-pay cards fall into this category, except where the operator is satisfied that adequate age verification checks have already been made by the card issuer. For the purposes of this document payment methods accessible by persons under 18 will be referred to as „higher risk payment types“. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (5) Age and Identity Verification should be prioritised for any customer that has not been age and identity verified and seeks to deposit with a higher risk payment type, and/or provides a date of birth between 18 and 21 years old. Industry and regulatory experience indicate that those who are underage who seek to register usually give an age which is close to their real age.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |



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| 6.2 (6) A licence holder's age verification system should include an element of objective validation via a verification service, such as that provided by specialist identity verification companies or through direct reference to reliable documentation, for example a passport, driving licence or birth certificate. Staff should be appropriately trained in age verification procedures.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (8) Age verification processes should be commensurate with the age confirmation facilities available in relevant jurisdictions. Where possible they should be completed within 72 hours (i.e. the age verification period), or within the period of time usually sufficient to carry out age verification for customers from a particular state. Unsuccessful age verification should lead to the account being supervised and then reviewed, restricted or suspended until procedures establish the age of the customer as over 18. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| During the age verification period:<br>6.2 (9) a) Customers may be able to deposit funds and gamble, however, they will not be able to withdraw any deposits or winnings until they are confirmed as over 18; and  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (9) b) Any deposited funds must be available for prompt return if it becomes apparent that the customer is/was underage, and bets are voided.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (10) Subject to the Gambling Commissioner's advice and no evidence of fraud, deposits should still be returned to the underage customer even where the lost deposits have been distributed to other customers. Reimbursement is not expected   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|   | OK                       | Fail                     | Observations  |
| to leave the underage customer any better than 'neutral' in terms of their gambling activity.   |                          |                          |   |
| 6.2 (12) A record should be kept of all accounts and gambling transactions affected by the participation of persons under the minimum permitted age. A description of the event/circumstance(s) that resulted in the account and associated gambling being permitted should also be recorded.                                       | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (13) Licence holders should have a clear documented policy which is applicable in the event that an underage individual is identified.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (14) Game design and/or game features shall not be of a nature that is primarily appealing to or associated with under 18"s, (e.g. „Barbie and Ken“).   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 6.2 (15) Where a licence holder uses the balance of personal, technical, financial or other data, including third party data and data provided by the customer, to establish age verification (e.g. in states where electronic verification is not accessible), a record of that methodology and its outcomes should be maintained. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>7 Fair gambling</b>  |                          |                          |   |
| <b>7.1 Game fairness</b>  |                          |                          |   |
| 7.1 (1) Licence holders should make information available to customers on their website(s) about their testing and quality assurance arrangements in place to assure fairness and randomness in their gaming products, including information about testing/certification by an ATF where  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|   | OK                       | Fail                     | Observations  |
| applicable and where this can be accessed.  |                          |                          |   |
| 7.1 (2) Licence holders should ensure appropriate systems and resources are deployed to prevent or detect attempts to cheat by customers or other parties. Such measures should be applied on a risk sensitive basis, with analytic programs (e.g. algorithms, exception reports, cluster analysis) deployed to identify long term or systemic cheating as well as short/medium term sporadic efforts.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 7.1 (3) Games should be implemented and operate fairly and strictly in accordance with the published rules and prevailing RTP where applicable.   | ✓                        | <input type="checkbox"/> |   |
| 7.1 (4) Games designed to give the customer only the perception that speed or skill influences the outcome of a game (e.g. 'steering' or 'aiming') should make this apparent in the game description.   | ✓                        | <input type="checkbox"/> |   |
| A licence holder should not implement game designs or features that may reasonably be expected to mislead the customer about the likelihood of particular results occurring. This includes, but is not limited to the following:<br><br>7.1 (5) a) Where a game simulates a physical device the theoretical probabilities and visual representation of the device should correspond to the features and actions of the physical device (e.g. roulette wheel). | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing this type of a game.     |
| 7.1 (5) b) Where multiple physical devices are simulated the probabilities of each outcome should be independent of the other simulated devices (e.g. dice games).  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing this type of a game.     |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| 7.1 (5) c) Where the game simulates physical devices that have no memory of previous events, the behaviour of the simulations should reflect the behaviour of the physical devices (e.g. roulette wheel, cards, dice games).                | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing this type of a game. |
| 7.1 (5) d) Games should not falsely display near-miss results, that is, the event may not substitute one random losing outcome with a different losing outcome.   | ✓                        | <input type="checkbox"/> |   |
| 7.1 (5) e) 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.                       | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing this type of a game. |
| 7.1 (5) f) 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. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing this type of a game. |
| 7.1 (5) g) 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 rule.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, the jackpot was tested before.   |
| 7.1 (6) If a cap is established on any jackpot, all additional contributions once that cap is reached should be credited to the next jackpot.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, the jackpot was tested before.   |
| 7.1 (7) If the artwork contains game instructions specifying a maximum win, then it should be possible to win this amount from a single game (including features or   | ✓                        | <input type="checkbox"/> |   |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| other game options.  |                          |                          |   |
| 7.1 (8) Casino games should operate at a speed that allows the player to establish the result of each cycle of the game. Players may be permitted to accelerate the speed of a game where they are still able to establish the result of each cycle.   | ✓                        | <input type="checkbox"/> |   |
| 7.2 "Play for Free" Games  |                          |                          |   |
| 7.2 (1) Play for free games for no prize are not gambling but should accurately reflect any 'real-money' version of the game and should not be used to encourage those under 18 to use licensed gambling facilities.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. No such free games on the platform. |
| 7.2 (2) In particular, such games should not be designed to mislead the player about the chances for success by, for example, using mappings that produce different outcomes than the cash game. Licence holders should be able to demonstrate this equivalence to the Gambling Commissioner upon request.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. No such free games on the platform. |
| 7.2 (3) Play for Free games for a prize, (ie games providing the opportunity to win a prize of money or monetary worth) do amount to gambling.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. No such free games on the platform. |
| 7.2 (4) Pay to Play games for no prize, sometimes referred to as 'social gaming', do not amount to gambling whilst the object or outcome of the game play does not amount to a prize. Where such games reflect any 'real money' games they should not be used to encourage those under 18 to use licensed gambling facilities and should perform consistently with 'real money' games. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. No such free games on the platform. |
| 7.3 Compensated or adaptive games  |                          |                          |   |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| 7.3 (1) Games should not be “adaptive” or “compensated”, that is, the probability of any particular outcome occurring should be the same every time the game is played, except as provided for in the (fair) rules of the game.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>7.4 No forced game play</b>  |                          |                          |   |
| 7.4 (1) The customer should not be forced to play a game simply by selecting it.  | ✓                        | <input type="checkbox"/> |   |
| 7.4 (2) A mechanism should be implemented to prevent repeated gamble instructions, (for example, where a customer repeatedly presses “play” while waiting for a game result) to be executed.  | ✓                        | <input type="checkbox"/> |   |
| <b>7.5 Auto-play</b>  |                          |                          |   |
| The customer should retain control of the gambling where auto-play functionality is provided. The auto-play functionality should:<br><br>7.5 (1) a) Enable the customer to choose the stake and either the number of auto-play gambles or the total amount to be gambled. | ✓                        | <input type="checkbox"/> |   |
| 7.5 (1) b) Enable the customer to stop the auto-play regardless of how many auto-play gambles they initially chose or how many remain.  | ✓                        | <input type="checkbox"/> |   |
| 7.5 (1) c) Not override any of the display requirements (e.g. the result of each gamble should be displayed for a reasonable length of time before the next play.).   | ✓                        | <input type="checkbox"/> |   |
| <b>7.6 Game control</b>   |                          |                          |   |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 7.6 (1) It should be possible for the licence holder to disable any game or game session.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 7.6 (2) The licence holder should be able to provide full audit trails when disabling a game that is currently in play.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 7.7 Incomplete games   |                          |                          |   |
| 7.7 (1) a) Where possible, licence holders should provide a mechanism in single player games for an incomplete game to be completed before a customer is able to participate in any other game. Incomplete games may occur as a result of:<br><br>Loss of communications between the licence holder and end customer device. | ✓                        | <input type="checkbox"/> |   |
| 7.7 (1) b) Licence holder restart,   | ✓                        | <input type="checkbox"/> |   |
| 7.7 (1) c) Game disabled by licence holder,  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope.                                      |
| 7.7 (1) d) End customer device restart, and Abnormal termination of gambling application on end customer device.   | ✓                        | <input type="checkbox"/> |   |
| 7.7 (2) Gambles associated with a partially complete game that can be continued should be held by the licence holder and be apparent to the customer.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 7.7 (3) The licence holder should ensure customer fairness, to the extent possible, in the event of a communication loss to one or more end customer devices during a multi-customer game.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| <b>7.8 Game / website design</b>   |                          |                          |   |
| 7.8 (1) The functions of all buttons represented on the website and games should be clearly indicated.   | ✓                        | <input type="checkbox"/> | These games have been passed by BMM for GIB, with same items, considered low risk to request client to retract from market. |
| 7.8 (2) Edges of the “hot” area of buttons should be clearly defined in the artwork to prevent clicking near buttons creating a gamble.  | ✓                        | <input type="checkbox"/> | These games have been passed by BMM for GIB, with same items, considered low risk to request client to retract from market. |
| <b>7.9 Poker / P2P Games</b>   |                          |                          |   |
| In respect of P2P games, in particular poker, licence holders should ensure appropriate collusion pattern analysis and reporting is in place to identify any biases or patterns that indicate collusion and be able to provide an appropriate level of investigation/intervention. As a minimum the analysis should:<br><br>7.9 (1) a) Aim to identify those individual players with unusually high/low levels of success and be satisfied that these outcomes are consistent with fair and predictable playing patterns and do not arise through extraneous or irregular events or actions. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Poker or P2P games.  |
| 7.9 (1) b) Be able to identify players who routinely make decisions contrary to the mathematically-optimal course of action, and yet persist to have success levels greater than expected.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Poker or P2P games.  |
| 7.9 (1) c) Review player table placement and aim to identify players who tend to collude or operate inappropriately in team groupings.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Poker or P2P games.  |



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|--|--------------------------|--------------------------|--|
|  | OK                       | Fail                     | Observations   |
| Be aware of existing and developing trends in player collusion methods and tactics.  |                          |                          |  |
| 7.9 (1) d) Be aware of existing and developing trends in player collusion methods and tactics.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Poker or P2P games. |
| 7.9 (5) Under their terms and conditions, poker rooms should make explicit that collusion of any form between players will not be tolerated and may lead to the suspension of funds pending investigation.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Poker or P2P games. |
| 7.9 (6) Operators should not permit the use of robots by customers and should have procedures in place to monitor the rooms for robots and, where detected, stop their play and conduct a review of the account.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing a Poker or P2P games. |
| <b>7.10 Sports betting and integrity</b>   |                          |                          |  |
| 7.10 (1) Sports betting licence holders should have procedures for identifying suspicious betting transactions and patterns which might identify a threat to the sport's integrity or any form of cheating. Where a threat is identified there should be a procedure for notifying the relevant sporting body in line with applicable data protection requirements, and for informing the Gambling Commissioner. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing sport betting game.   |
| 7.10 (2) Licence holders should give active consideration to joining properly structured and organized information sharing/alert mechanisms for managing suspicious bets or accounts.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing sport betting game.   |
| 7.10 (3) Effective risk control mechanisms should be in place for managing events  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing                       |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| offered, bet sizes and prices, taking into consideration available cash and cash equivalents.   |                          |                          | sport betting game.   |
| 7.10 (4) The terms and conditions for sports betting (and other betting events) should be 'fit for purpose' in terms of the products offered and the safeguards need to deter or disrupt corrupt betting, breaches of the rules of any sport or competition attracting bets, or any other attempt to cheat, commit fraud, breach terms and conditions or otherwise operate an account in a way that may undermine the integrity of the affected event or the betting on that event. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, not testing sport betting game.      |
| <b>8 Information and data security</b>  |                          |                          |   |
| <b>8.1 General</b>  |                          |                          |   |
| 8.1 (01) Information security processes should include the implementation of programs and practices to protect information and information systems from unauthorized access, use, copying, disclosure, disruption, modification, or destruction and ensure that an adequate audit trail of any actions is created.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (02) Security policies and procedures should be documented and communicated to relevant employees, and reviewed at least annually or in the event of material changes or system failures.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (03) Security policies and procedures should be implemented and monitored. Risk-based internal and external security reviews should be conducted at least annually or in the event of material changes  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| or system failures.  |                          |                          |   |
| 8.1 (04) Physical security perimeters should be in place to restrict access to authorized personnel to areas that contain information and information processing facilities and to reduce the risk of environmental threats and hazards to equipment.              | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (05) Relevant third party and business partner contractual terms and conditions should provide for the equivalent or greater protections that those applied by the licence holder. Third party data processing is a known weakness in the data security chain. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (06) Virus scanners and/or detection programs should be installed on all relevant and vulnerable information systems. These programs should be updated regularly to scan for new strains of viruses and other malicious software.                              | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (07) Controls should be in place to manage changes to information processing facilities and systems in order to reduce the risk of security or system failures.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (08) All customers should be verified with an account identifier/password pair, or by any other means that provide equal or greater security (e.g. digital certificates), prior to being permitted to participate in gambling activities.                      | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (09) All system users should have their identity verified with an account identifier/password pair, or by any other means that provide equal or greater security, prior to being permitted to access   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| the system. All system user actions should be logged.   |                          |                          |   |
| 8.1 (10) All customer deposit, withdrawal or adjustment transactions should be subject to strict security control and should be recorded in a system audit log.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (11) Information involved in online transactions should be protected to prevent incomplete transmission, mis-routing, unauthorised message alteration, unauthorised disclosure, unauthorised message duplication or replay.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (12) A policy on the use of cryptographic controls for protection of information should be developed and implemented.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (13) The Gambling Commissioner recognises that there are various recognised information security guidelines / standards, including ISO/IEC 27002 by the International Organisation for Standardisation ("ISO"), the Standard of Good Practice by The Information Security Forum, PCI, eGap and COBIT. These and credible equivalents may be adopted by licence holders.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 8.1 (14) Further to the guidelines above, the Commissioner does not intend to develop and maintain detailed information security guidelines for its licence holders to follow. Licence holders should follow and comply with a recognised information security standard(s) and approved testing house methodologies and should be able to provide the Commissioner with proof of information security testing to a particular information security standard(s). | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 8.1 (15) Substantive disruptions to licence holders' operating systems should be notified to the Gambling Commissioner commensurate with the seriousness and nature of the disruption; interference or manipulation of systems to affect gambling transactions should be notified at the earliest opportunity. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>10 Complain.</b>  |                          |                          |   |
| <b>10.1 Complaints Resolution Process</b>  |                          |                          |   |
| 10.1 (1) Licence holders should have a documented complaints procedure for staff to follow. A licence holder should promptly and properly enquire into all complaints. The details of all substantive complaints should be retrievable by licence holders.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 10.1 (2) Contact information for customer service, including complaints and dispute resolution, should be available on the licence holder's websites.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 10.1 (3) Customers should be able to submit complaints and disputes on a 24/7 basis.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 10.1 (4) Where possible websites should aim to provide assistance and guidance to all customers in the same language as the content of the site.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 10.1 (5) If the licence holder's complaint procedure, including any third-party resolution process, fails to resolve the issue the participant may refer their complaint to the Commissioner via the Commissioner's Complaint Resolution Procedure by  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| submitting a Complaint Resolution Request Form.  |                          |                          |   |
| 10.1 (6) Other than in exceptional circumstances, the Commissioner's Complaint Resolution Procedure requires the participant to use the licence holder's complaints procedure before the Commissioner's Complaint Resolution Procedure may be used. Exceptional circumstances would include very serious complaints involving substantial sums or issues of public interest. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>11 Randomness</b>   |                          |                          |   |
| <b>11.1 RNG and Game Randomness</b>  |                          |                          |   |
| 11.11 (1) Licence holders should be able to demonstrate the fairness and randomness of all games to the Gambling Commissioner without any undue delay.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 11.1 (2) a) The output obtained through the use of the RNG in games shall be proven to: Be statistically independent.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 11.1 (2) b) Be uniformly distributed over their range.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 11.1 (2) c) Pass various recognised statistical tests intended to demonstrate a) and b) above and the absence of patterns.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 11.1 (2) d) Be unpredictable without knowledge of the algorithm, its implementation, and the current seed value (all of which should be secure).   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 11.1 (2) e) be random and distributed in   | <input type="checkbox"/> | <input type="checkbox"/> | N/A   |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| accordance with the rules and expected probabilities of the game.   |                          |                          | RNG was out of scope.   |
| <b>11.3 RNG Failure</b>   |                          |                          |   |
| 11.3 (1) Systems should be in place to quickly identify any failure of the RNG (for example, if a short sequence is repeated, or if the output is a constant flow of the same value).   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                  |
| 11.3 (2) In the event of an RNG failure, games that rely upon that RNG should be made unavailable for gambling until the failure is rectified or the RNG replaced.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                  |
| <b>11.4 Verifiably fair</b>   |                          |                          |   |
| 11.4 (1) a) A licence holder's remote gambling services should be verifiably fair to the customer in terms of the performance of the facility in accordance with the published rules and terms and conditions. The licence holder's website(s) and game client (where applicable) should have a 'fairness'/'fair gambling' content that:<br><br>Informs the customer of the measures taken to ensure fair gambling such as the in-house and/or external quality management and/or testing that the licence holder undertakes to certify the fairness and reliability of its product(s). | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 11.4 (1) b) Provides access to copies of any certificates by ATFs and/or other bodies with respect to information security, RNG (randomness, fairness, integrity etc.) .  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                  |
| 11.4 (1) c) Provides a Frequently Asked Questions ("FAQ") section specific to   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing                     |

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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| gambling fairness.   |                          |                          | game functionality.   |
| 11.4 (2) The home page, 'about us' page and the customer registration pages of the licence holder's website(s) should display a link to the licence holder's 'fairness'/'fair gambling' gambling content.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| <b>12 Compliance and Testing</b>   |                          |                          |   |
| <b>12.1 Compliance</b>   |                          |                          |   |
| 12.1 (1) The Generic Code requires licence holders to meet the Commissioner's Remote Technical and Operating Standards document, including proof of testing. The following section sets out in general terms the Commissioner's testing requirements in respect of the RTOS, including third party examination, and provides advice on the Commissioner's approach to assess compliance with the RTOS. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (2) The Commissioner will have regard to a licensee's compliance record when determining if the current level of testing and assurance arrangements are adequate.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (3) a) To determine what, and the level of, testing that is required for each standard and corresponding guidelines the Commissioner will consider:<br>a) Visibility: Whether compliance may be easily assessed by observation.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (3) b) Expertise: Whether particular expert skills are required to properly assess compliance.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (3) c) Precedent: Whether there is  | <input type="checkbox"/> | <input type="checkbox"/> | N/A   |



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|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| precedent for error or reliability.  |                          |                          | Out of testing scope, only testing game functionality.        |
| 12.1 (3) d) Potential customer impact: Whether non compliance has an unfair or significant impact (e.g. fairness or financial) on the customer, whether it's easily rectifiable, or whether it may be inconsequential.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (3) e) Priority: Whether the regulation is considered a priority in online gambling regulation.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (4) Operators should implement a product testing policy, approved and supported by its senior management, which will provide for the testing of all products for fairness and randomness.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| 12.1 (5) The policy should make provision for the internal and external testing of product fairness and randomness.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing game functionality. |
| <b>12.2 RNG Testing</b>  |                          |                          |   |
| 12.2 (1) Prior to the commercial use of a new RNG in the provision of remote gambling facilities, a licence holder shall furnish the Commissioner with a certificate from an ATF confirming that the output of the RNG passes recognised statistical randomness tests confirming that it meets the randomness requirements in section 11.1(2). | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                  |
| 12.2 (2) The Commissioner will also consider other forms of certifying the fairness and randomness of RNGs used, such as source code testing, as long as the licence holder  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                  |

| Remote Technical and Operating Standards<br>for the Gibraltar Gambling Industry Version<br>1.1.0 20/09/2012   | Results                  |                          |                              |
|---|--------------------------|--------------------------|------------------------------|
|   | OK                       | Fail                     | Observations                 |
| and ATF can demonstrate that it meets the underlying objective that the gambling is verifiably fair to the customer.  |                          |                          |                              |
| 12.2 (3) Where appropriate, the Commissioner will recognise RNGs that are tested and certified in accordance with the requirements of other jurisdictions that licence and regulate remote gambling consistently with the Gibraltar regulatory model.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope. |
| 12.2 (4) Where appropriate, the Commissioner may also recognise prior ATF certification undertaken on behalf of a software supplier.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope. |
| 12.2 (5) For the certification to remain valid there must be no changes to the RNG. Any changes to the RNG previously certified, needs to be re certified before it is reintroduced to the live environment.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope. |
| <b>12.3 Game engine testing</b>   |                          |                          |                              |
| 12.3 (1) Prior to the commercial use of a new game engine in the provision of remote gambling facilities, a licence holder shall furnish the Commissioner with a certificate from an ATF confirming that the game engine's output (after scaling and mapping) conforms to the randomness requirements in section 11.1(2). | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope. |
| 12.3 (2) Where appropriate, the Commissioner will recognise game engines that are tested and certified in accordance with the randomness/fairness requirements of another jurisdiction that licence and regulates remote gambling consistently with   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope. |

| Remote Technical and Operating Standards<br>for the Gibraltar Gambling Industry Version<br>1.1.0 20/09/2012   | Results                  |                          |   |
|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| the Gibraltar regulatory model.   |                          |                          |   |
| 12.3 (3) Where appropriate, the Commissioner will also recognise prior ATF certification undertaken on behalf of a software supplier.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality  |
| 12.3 (4) For the certification to remain valid there must be no changes to the mapping or scaling and/or game engine. Any changes to the game engine and mapping or scaling previously certified, needs to be re certified by an ATF before it is reintroduced in to the live environment.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| <b>12.4 Ongoing monitoring</b>  |                          |                          |   |
| 12.4 (1) a) Further to ATF certification of the RNG and game engine prior to being used in the provision of remote gambling, periodic reviews of the game engine's output should also be undertaken as part of a licence holder's arrangements to ensure the ongoing fairness and integrity of its game engines:<br><br>a) A licence holder may perform the following reviews in house on the condition that: | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 12.4 (1) a) i) the in-house monitoring methodology has been previously reviewed and certified by a qualified third party approved by the Commissioner;  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.4 (1) a) ii) the licence holder has demonstrated to the Commissioner or Licensing Authority that its practices and outcomes in product development, change control and testing are reliable and meet appropriate standards;  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

| Remote Technical and Operating Standards<br>for the Gibraltar Gambling Industry Version<br>1.1.0 20/09/2012   | Results                  |                          |   |
|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| 12.4 (1) a) iii) the game engine's outcome is certified annually to verify the results of the licence holder's quarterly assessments.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.4 (1) b) Where a game engine has a theoretical RTP (e.g. slot games) a licence holder should employ reliable and audited means to perform quarterly RTP analysis of the game engine's output.  | <input type="checkbox"/> | <input type="checkbox"/> |   |
| 12.4 (1) c) Where a game engine does not have a theoretical RTP (e.g. poker), a licence holder should employ reliable and audited means to perform quarterly statistical analysis of the game engine's output including its distribution to certify that it is in accordance with the theoretical outcome probabilities of the game engine. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.4 (1) d) All such reports are to be made available to the Gambling Commissioner on request.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.4 (2) Licence holders should complete a system-wide regression test at least annually.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.4 (3) The financial data log files should be reconciled to movements on the accounts to ensure accuracy and completeness of data used in final result output-based payout percentage and RNG testing.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| <b>12.5 Further testing</b>   |                          |                          |   |
| 12.5 (1) The Commissioner may require and impose further testing and/or certification where there are concerns about quality or compliance failures.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

| Remote Technical and Operating Standards<br>for the Gibraltar Gambling Industry Version<br>1.1.0 20/09/2012  | Results                  |                          |   |
|--|--------------------------|--------------------------|---|
|  | OK                       | Fail                     | Observations  |
| 12.5 (2) In such cases the Commissioner may request the licence holder to employ the services of a different ATF to any previously employed by the licence holder to certify its RNGs and/or game engines.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>RNG was out of scope.                                      |
| 12.5 (3) Notwithstanding that the primary focus of ATF testing is standard 11, where there are concerns about quality or compliance failures the Gambling Commissioner may request licence holders to have a particular area of their activities or operation, beyond standard 11, to be reviewed/examined by an ATF or other independent third party. The cost of the examination shall be assumed by the licence holder. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| <b>12.6 Software development and maintenance</b>   |                          |                          |   |
| 12.6 (1)A development methodology for software and applications should be defined, documented and implemented.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (2) All documentation relating to software and application development should be available and retained for the duration of its lifecycle.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (3) a) Change control procedures should be implemented in line with the change management policy and should cater for the following: Approval procedures for changes to software.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (3) b) A policy addressing emergency change procedures.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (3) c) Procedures for testing and   | <input type="checkbox"/> | <input type="checkbox"/> | N/A   |

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|---|--------------------------|--------------------------|---|
|   | OK                       | Fail                     | Observations  |
| migration of changes.   |                          |                          | Out of testing scope, only testing the game functionality.        |
| 12.6 (3) d) Segregation of duties between the developers, quality assurance team, the migration team and users.   | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (3) e) Procedures to ensure that technical and user documentation is updated as a result of a change.  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (3) f) Procedures to ensure that security control requirements are specified for new information systems, or enhancements to existing information systems. | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |
| 12.6 (4) The development and test environments ought to be isolated physically and logically from the live operational systems                                  | <input type="checkbox"/> | <input type="checkbox"/> | N/A<br>Out of testing scope, only testing the game functionality. |

#### 4. ADDITIONAL INFORMATION/OBSERVATIONS

##### MODIFICATION 01:

This report GIB.EYECON.1009.01.02 is a modification and replaces the BMM test report previously issued with reference GIB.EYECON.1009.01 dated 31<sup>st</sup> January 2020. The reasons for the modification are as follows:

- Changed the client results' RTP on page 4 due to a request for the client to put three decimals on their RTP instead of rounding to the second decimal.

#### 5. CONCLUSIONS

According to the test results<sup>1</sup>, BMM Spain Testlabs s.l.u. confirms that the item submitted for testing is compliant with all the relevant Regulations listed in section "Technical Standard used for Evaluation" of this report.

Yours sincerely,

Francesco Bianchi  
**Director of iGaming Operations EURSAM**

Mario Zilevski  
**Director of Technical Services - Europe**

<sup>1</sup> The results included in this document refer exclusively to the sample tested, such as it is described in the corresponding section.