



Verification report: ITL1801659

Eyecon Alderney Limited

Fluffy In Space Certification Report

30 October 2018



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I. General information

No.	Description	Details								
1.	Identification	Fluffy In Space								
2.	Verification body issuing the certificate (test house)	iTech Labs Australia Suite 24, 40 Montclair Ave Glen Waverley, VIC 3150, Australia URL: http://www.itechlabs.com E-mail: info@itechlabs.com								
3.	Standards used for testing	<ul style="list-style-type: none">Alderney Gambling Control Commission Technical Standards and Guidelines for Internal Control Systems and Internet Gambling Systems – Version 4.2UK Gambling Commission UK Remote Gambling and Software Technical Standards – June 2017 Testing Strategy for Compliance with Remote Gambling and Software Technical Standards – June 2017Gibraltar Remote Technical and Operating Standards for the Gibraltar Gambling Industry – Gambling Commissioner’s Guidelines – v.1.1.0Isle of Man IOM Online Gambling (Systems Verification) (No. 2) – Regulations 2007Malta Malta Remote Gaming Regulations S.L.438.04 <p>Please refer to Appendix at the end of this report for details</p>								
4.	Details of the module tested	<table><tr><th>No.</th><th>Game Name</th><th>Game Type</th><th>Channel</th></tr><tr><td>1.</td><td>Fluffy In Space*</td><td>Slot</td><td>HTML5: (Desktop & Mobile)</td></tr></table> <p>*Two variants: with and without Jackpot</p>	No.	Game Name	Game Type	Channel	1.	Fluffy In Space*	Slot	HTML5: (Desktop & Mobile)
No.	Game Name	Game Type	Channel							
1.	Fluffy In Space*	Slot	HTML5: (Desktop & Mobile)							
5.	Type of the module tested	Casino Games								
6.	Produced by	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL Contact: Robert Black (robert.black@eyecon.com)								
7.	Licensee details	Not applicable								
8.	Date of request for verification	9 October 2018								
9.	Date of completion	30 October 2018								
10.	Platform supplier	Eyecon Alderney Limited								
11.	Platform version	1.4.7.2								
12.	RNG used for testing	1.0.1								
13.	Other records	Fluffy In Space is a new game and has not been previously certified. Fluffy In Space is a clone game of the certified Hold								

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		<p>The Safe (REF: ITL1801126 and ITL1801127). Testing was conducted on the following devices:</p> <ul style="list-style-type: none"> • Desktop • iPhone 6S Plus (Browser: Safari) • Samsung Galaxy S5 / S7 (Browser: Chrome) • iPad Mini 4 (Browser: Safari) • Samsung Galaxy Tab 4 (Browser: Chrome)
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II. Details of hardware

No.	Description	Details
1.	Produced by	Not applicable
2.	Identification of hardware	Not applicable
3.	Features that characterize the hardware	Not applicable
4.	Reference to verification	Not applicable
5.	Other records	Not applicable

III. Details of software components

No.	Description	Details																		
1.	Produced by	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL Contact: Robert Black (robert.black@eyecon.com)																		
2.	Details of the software components	<div>Fluffy In Space DH<table><tr><th>Front End</th><th>Rules</th></tr><tr><td>com.eyecon.lamington.slot-fluffy-in-space</td><td>carbine-slots_fluffyInSpace_96_standard</td></tr><tr><td>Version: 2.0.9</td><td>Version: 3.1.2</td></tr><tr><td>SHA1: ee3f37bc908e3142efa92fc21c50637a74457db4</td><td>SHA1: 0cc986e9c7b37293255e10b4066c9f53def560fb</td></tr></table></div> <div>Fluffy In Space MH<table><tr><th>Front End</th><th>Rules</th></tr><tr><td>com.eyecon.tamborine.slot-fluffy-in-space</td><td>carbine-slots_fluffyInSpace_96_standard</td></tr><tr><td>Version: 5.0.10</td><td>Version: 3.1.2</td></tr><tr><td>SHA1: 7f70547b11861103b685b7260a54209578fc0603</td><td>SHA1: 0cc986e9c7b37293255e10b4066c9f53def560fb</td></tr></table></div> <div>Fluffy In Space DH JP<table><tr><th>Front End</th><th>Rules</th></tr></table></div>	Front End	Rules	com.eyecon.lamington.slot-fluffy-in-space	carbine-slots_fluffyInSpace_96_standard	Version: 2.0.9	Version: 3.1.2	SHA1: ee3f37bc908e3142efa92fc21c50637a74457db4	SHA1: 0cc986e9c7b37293255e10b4066c9f53def560fb	Front End	Rules	com.eyecon.tamborine.slot-fluffy-in-space	carbine-slots_fluffyInSpace_96_standard	Version: 5.0.10	Version: 3.1.2	SHA1: 7f70547b11861103b685b7260a54209578fc0603	SHA1: 0cc986e9c7b37293255e10b4066c9f53def560fb	Front End	Rules
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Version: 5.0.10	Version: 3.1.2																			
SHA1: 7f70547b11861103b685b7260a54209578fc0603	SHA1: 0cc986e9c7b37293255e10b4066c9f53def560fb																			
Front End	Rules																			



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		com.eyecon.lamington.slot-fluffy-in-space	carbine-slots_fluffyInSpace_90_jack pot
		Version: 2.0.9	Version: 3.1.3
		SHA1: ee3f37bc908e3142efa92fc21 c50637a74457db4	SHA1: 2d32a86db70efade1aad955 36f4903b03b98a68c
		Fluffy In Space MH JP	
		Front End	Rules
		com.eyecon.tamborine.slot-fluffy-in-space	carbine-slots_fluffyInSpace_90_jack pot
		Version: 5.0.10	Version: 3.1.3
		SHA1: 7f70547b11861103b685b726 0a54209578fc0603	SHA1: 2d32a86db70efade1aad955 36f4903b03b98a68c
		File Name	
		EvaluationChain.java	
		ReelSymbolExpander.java	
		CountSymbolEvaluator.java	
		IncrementMultiplierPatternEvaluator.java	
		LinesWinMultiPatterEvaluator.java	
		PatternMatchingEvaluator.java	
		PrizeLinePatternMatchingEvaluator.java	
		RebetsLineWinPatternMatchingEvaluator.java	
		DisplayGenerator.java	
		RebetDetailBuilder.java	
		RebetEvaluator.java	
		ReelStripGenerator.java	
		ResetRebetEvaluator.java	
		PrizeLineTriggerEvaluator.java	
		TriggerRandomMultiplierEvaluator.java	
		CarbineGame.java	
		CarbineGameComponent.java	
		GameWinsCalculatorImpl.java	
		PrizeMultiplier.java	
		RetriggerCount.java	
		EyeconSpinGameRules.java	
		Multiplier.java	
		RngSequences.java	
		SlotGameVariableConfigurationImpl.java	
		SymbolHoldSpinGame.java	
		SymbolHoldSpinRuleImpl.java	
		SymbolHoldSpinScreenEvaluator.java	
		SymbolHoldTriggerEvaluator.java	
		SymbolSwapSpinShapeEvaluator.java	
		SymbolSwapSpinTriggerEvaluator.java	
		carbine-slots_fluffyInSpace_96_standard-3.1.2.json	

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		carbine-slots_fluffyInSpace_90_jackpot-3.1.3.json
		MysteryPoolImpl.java
		ProbabilityPoolImpl.java
3.	Features that characterise the software object	See at the end of this table ¹
4.	Any % RTP	See at the end of this table ²
5.	List of software executables and digital signatures (SHA-1)	See at the end of this table ³
6.	Other records	None

¹ Features that characterise the software object

No.	Game Name	Game Type	Game Description	Min Bet*	Max Bet*
1.	Fluffy In Space	Slot	Fluffy In Space is a 5-reel, 25-payline slot with two scatter symbols which will trigger two different type of features.	£0.25	£12.50

*Tested on the test environment; may vary on production environment depending on the operator's configurations.

² RTP for the game

No.	Game Name	Theoretical RTP	Simulated RTP
1.	Fluffy In Space DH Fluffy In Space MH	96.3%	96.33%
2.	Fluffy In Space DH JP Fluffy In Space MH JP	90.1% + Jackpot 3.0%	90.19% + Jackpot 3.0%

³ List of software executables and digital signatures (SHA-1)

File Name	SHA-1
carbine-game-engine-5.3.12.jar	cecf120410d231e13b0e820d2c81cfb1a895da45
EvaluationChain.class	3d0207cbe56eba582d42c70c392f28858fda2273
ReelSymbolExpander.class	6c5bafa1a580f7b128d1de8b9e321ecd9fa219eb
CountSymbolEvaluator.class	1d7644d382c6c84155c818032b4a2fe340b32258
IncrementMultiplierPatternEvaluator.class	3912cf4f237b2e7073af9330696006af2e51ef29
LinesWinMultiPatterEvaluator.class	ce5abb2d5c2ca703f6b06f8eb6823ff6910a900e
PatternMatchingEvaluator.class	56036e07020215231ba6909d36b4e0ba3c4243f3
PrizeLinePatternMatchingEvaluator.class	ce434d72e19dad5c724b6743f3bc8f0a4cf9fa37
RebetsLineWinPatternMatchingEvaluator.class	fa9f77ba4ad7dcad6c91fcd2ea7b286d0bfd9f0
DisplayGenerator.class	b95e0598abad25b5de9aad7f918a13aa2c7daa3f
RebetDetailBuilder.class	e969f64e559322cb12480a32d9b0425429c67f24
RebetEvaluator.class	b528808bcb7ea5c5d8b3d4b612e70a6166ece72f
ReelStripGenerator.class	63b1d6b446b7fd984f33f64e2c7f92cf3cb12e2d
ResetRebetEvaluator.class	6bd4c8f1ebcbbd541183e0f9530f8282f589fd35
PrizeLineTriggerEvaluator.class	87c019a489323d5a21647eb4fb5490a591acc23d



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TriggerRandomMultiplierEvaluator.class	5fe3ba7bd37ea1498312b096f03462d26de25354
CarbineGame.class	69554679e4d311b80e226262fdff5b75bb1ff61d
CarbineGameComponent.class	388de812da75f10fea4236396450fc1a1c81c1a2
GameWinsCalculatorImpl.class	aceae7edd43e4e8eaedd3fe46fe19cfca60ad6ff
PrizeMultiplier.class	f13bcafe258980ffe414cbeb1c8983497bd25204
RetriggerCount.class	47818b75f8db12f564de09bd4551299a9365ee2e
EyeconSpinGameRules.class	c2322ecec726793dc4f4222dec15c0ea200badd6
Multiplier.class	475ca37a999a425cfda84f2978d7f2603e7a93a4
RngSequences.class	8a6856ec68b4113eed6b3238051cc95f714fa0d4
SlotGameVariableConfigurationImpl.class	17ee91d201fa7026c0a3001f92914b1c3bb306db
SymbolHoldSpinGame.class	df3965328dcade2f475046e3c405a59534ba6648
SymbolHoldSpinRuleImpl.class	8a014a9efe2a03dce7b4681da86ba7fa3dcd738f
SymbolHoldSpinScreenEvaluator.class	e25cd1133667bb51af9823aca38c7aeb7207d31a
SymbolHoldTriggerEvaluator.class	738559c5639c5b0d791d054572b58d9d9c97b0fa
SymbolSwapSpinShapeEvaluator.class	4df55e1558ed36903723334b49c5480f75fd298a
SymbolSwapSpinTriggerEvaluator.class	f216443223704184795f96b07ad77ddfe86f1a7e
carbine-slots_fluffyInSpace_96_standard-3.1.2-config.jar	0cc986e9c7b37293255e10b4066c9f53def560fb
carbine-slots_fluffyInSpace_96_standard-3.1.2.json	b7638d667217cc05ceec6e10797cfeba30eb3777
carbine-slots_fluffyInSpace_90_jackpot-3.1.3-config.jar	2d32a86db70efade1aad95536f4903b03b98a68c
carbine-slots_fluffyInSpace_90_jackpot-3.1.3.json	047b129c3584f8e5ebce2abd09024b90e9947f2e
pool-server-service-1.0.12.jar	a1c068c4b17e5426fee9a338ded1da6e027e585e
MysteryPoolImpl.class	0263aeeadca71ad3e7b7e9abc04861e8850ba056
ProbabilityPoolImpl.class	8a1f95edde3ea19c7a2ff1a5f74269dc9f62318a

IV. Details of tests

Product identification: Fluffy In Space

Technical standards used for evaluation: Please refer to Appendix at the end of this report

No.	Tests Performed	Details of Tests	Results
Desktop			
1.	Game rules & artwork evaluation	Evaluation of game rules and artwork was conducted to ensure that they satisfy relevant requirements in the standards and the game does work according to the game rules and artwork.	Passed
2.	Regression tests	Regression tests were conducted to verify the components not affected by the changes remain the same and work correctly. Evaluation was also conducted to verify that Fluffy In Space is a clone of Past The Post.	Passed
3.	Paytable verification	Paytable verification was conducted to verify that the game payouts are in accordance with the paytable.	Passed
5.	Simulated RTP	RTP simulations using the game code were conducted for the game. See section III.4 above.	Passed
6.	Source code comparison	Source code comparison between Fluffy In Space and Past The Post was performed on critical components of the software to ensure that the changes comply with the relevant standards and that there are no unintended functionalities.	Passed
7.	Game performance report	Controlled tests were conducted to ensure that the Game Performance Report reflects the actual game play and the data obtained is complete and accurate.	Passed

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Mobile			
1.	Game rules & artwork evaluation (as required for mobile-specific components)	Evaluation of game rules and artwork was conducted for mobile-specific components to ensure that they satisfy relevant requirements in the standards and the game does work according to the game rules and artwork.	Passed
2.	Functional tests (as required for mobile-specific components)	Functional tests were conducted for mobile-specific components to ensure that they satisfy relevant requirements in the standards.	Passed
3.	Regression tests	Regression tests were conducted to verify gameplay, accuracy of balance update, game history, and to verify that the mobile version of the game is the same as the desktop version.	Passed
4.	Paytable verification	Paytable verification was conducted to verify that the game payouts are in accordance with the payable.	Passed
5.	Source code review	Source code examination was performed to verify that the desktop and mobile versions of the game share the same source code.	Passed
Other			
1.	Other records	<p>Fluffy In Space is a new game and has not been previously certified. Fluffy In Space is a clone game of the certified Hold The Safe (REF: ITL1801126 and ITL1801127).</p> <p>Testing was conducted on the following devices:</p> <ul style="list-style-type: none"> • Desktop • iPhone 6S Plus (Browser: Safari) • Samsung Galaxy S5 / S7 (Browser: Chrome) • iPad Mini 4 (Browser: Safari) • Samsung Galaxy Tab 4 (Browser: Chrome) 	Not applicable


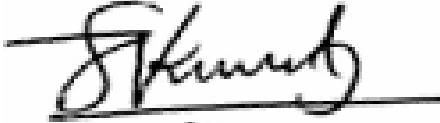
V. Final declaration and conformity

No.	Description	Details
1.	Certification	<p>Date of certification: 30 October 2018</p> <p>Software provider: Eyecon Alderney Limited</p> <p>Licensee name: N/A</p> <p>Licensee site URLs: N/A</p> <p>iTech Labs certifies that Fluffy In Space complies with the relevant requirements (as applicable for software providers) listed in Appendix below.</p> <p>iTech Labs recommends that Fluffy In Space be approved for deployment.</p>



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Signatures:

 <hr/> Alvin Rizaldi Senior Consultant iTech Labs Australia 30 October 2018	 <hr/> Kiren Sreekumar Principal Consultant iTech Labs Australia 30 October 2018
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VI. Conclusion

While it is not possible to test all possible scenarios in a laboratory environment, iTech Labs has conducted a level of testing appropriate for a submission of this type.
Accordingly, subject to the above comments, iTech Labs certifies that the items under test comply with the relevant Technical Standards, unless otherwise stated.



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Appendix

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Alderney Gambling Control Commission

Technical Standards and Guidelines for Internal Control Systems and Internet Gambling Systems
Version 4.2

I. Complete requirements met by the tests

Requirements	Results
2.13 Jackpot accounting	Comply, subject to section II. Observations below
3.6 Accepting Wagers	Comply, subject to section II. Observations below
4.2 Alderney Branding	Comply, subject to section II. Observations below
4.3.5 Mapping and Scaling Algorithms – sections vii, viii, ix and x	Comply
4.3.6 Information on Percentage Return to Player	Comply
4.4 Customer Game Session	Comply, subject to section II. Observations below
4.5.1 Malfunction	Comply
4.7 eGambling Requirements	Comply, subject to section II. Observations below
4.8 Game Design	Comply, subject to section II. Observations below
4.9 Requirements for Games against the House (not P2P)	Comply, subject to section II. Observations below
4.10 Game Artwork	Comply
4.11 Wheel (Reel) Requirements	Comply
4.12 Positioning, Size, Colour and Shape	Comply
4.13 Substitutes	Comply
4.14 Winning Patterns	Comply
4.15 Features	Comply
4.16 Keno and Bingo Artwork Requirements	Not applicable
4.17 Card Game Artwork Requirements	Not applicable
4.18 Gamble Option Artwork Standards	Not applicable
4.19 Roulette	Not applicable
4.20 Dice Games	Not applicable
4.21 Simulated Wagering	Not applicable
4.22 Scratch Ticket	Not applicable
4.23 Video Poker	Not applicable
4.24 Blackjack	Not applicable
4.25 Live Gambling Studio Control Guidelines and Standards	Not applicable
4.26 Event Based Wagering	Not applicable
4.27 Other Games	Not applicable
4.28 Peer to Peer (P2P) Games	Not applicable
4.29 Jackpots and Promotional Jackpots	Comply, subject to section II. Observations below

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	Observations below
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II. Observations

No.	Description	Remarks	Notes
1.	AGCC Ref 2.13 Jackpot accounting i) Where jackpot contributions are part of the return to player calculation, the contributions should not be assimilated into revenue.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
2.	AGCC Ref 3.6.2 Accepting wagers in Fun play It is expected that fun play games will offer the fun player an identical theoretical percentage return to player and gaming experience as the licensee offers at the same moment to registered customers of gambling.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
3.	AGCC Ref 4.2 Alderney Branding If the IGS shows an Alderney Gambling Control Commission logo, icon, brand or trademark (as provided by the Commission) anywhere within its operation, it should be hyperlinked to the Commission's home page.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
4.	AGCC Ref 4.2.1 Signposting An eGambling licensee or foreign gambling associate certificate holder shall ensure the customer is notified and warned if (i) the proposed gambling is to be conducted outside of the jurisdiction of Alderney; (ii) the proposed gambling is to be conducted with an entity whose gambling systems are not regulated or monitored by the Commission. Describe how this is achieved.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
5.	AGCC Ref 4.4 Customer Game Session	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
6.	AGCC Ref 4.7.1 Game Fairness vii) Game rules cannot be changed between a customer making a bet and the decision and payment of winnings for the bet. Game rules should not be changed during a customer's gaming session unless the licensee provides effective notification to the customer. Describe how the licensee addresses the risk of changing game rules while a customer is logged in.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility

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7.	AGCC Ref 4.8.3 Game Disable	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
8.	AGCC Ref 4.8.4 Incomplete Games i) Incomplete games include: c) Disabled by licensee or by the IGS.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
9.	AGCC Ref 4.8.4 iv) Game rules should specify that unresolved bets placed but remaining undecided in incomplete games will become void after 90 days and will be forfeited to charity.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
10.	AGCC Ref 4.8.4 v) In the event that a game cannot be continued due to an IGS action, all bets should be returned to the customers of that game.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
11.	AGCC Ref 4.9 vi) Where hotlinks are used to supply game information, game play should not occur if the hot linked information is not available. The licensee should check the availability of this information with reasonable frequency.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
12.	AGCC Ref 4.9 vii) In the event that a game cannot be continued due to an IGS action, all bets should be returned to the customers of that game.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
13.	AGCC Ref 4.9 xii) Game replay A "replay last game" facility should be provided either as a re-enactment or by description. The replay should clearly indicate that it is a replay of the previous game and provide the following information (as a minimum): a) The date and time the game was played. b) The display associated with the final position of the game either graphically or via a clear text message. c) Account balance (and game balance, if applicable) at the start of play. d) Account balance (and game balance, if applicable) at the end of play. e) Amount bet including any multipliers (e.g. number of lines played and credits per line). f) The total number of credits won associated with the prize resulting from the last play or the value in the customer's selected denomination	Eyecon is a licensed game and software provider. iTech Labs has verified the presence of all game history elements and the accuracy aspect of the history (i.e. completed games are accurately recorded in the game history). Presentation (appearance) of game history to players is the licensee's responsibility.	Licensee responsibility

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	<p>for all prizes.</p> <p>g) Details of any amount transferred to or from the session balance, but before the next play.</p> <p>h) Any player choices involved in play outcome</p> <p>i) Results of intermediate game phases (see below)</p> <ul style="list-style-type: none"> • Feature games • Free games • Gambles • Bonus wins 		
14.	<p>AGCC Ref 4.29.3</p> <p>Jackpot win notification</p> <p>iii) Whenever a jackpot is won, the notification of the jackpot being won should be notified to all active end user devices and the jackpot amount should be displayed (so far as it is practical to do so) on all end player devices participating in the jackpot at the time of the jackpot win. (Naturally, notification won't be displayed at the time of the jackpot win if an eligible playing device is being connected when jackpot is won or is transmitting a play instruction or is disconnected when the notification is sent.)</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure these requirements are satisfied.</p>	Licensee responsibility
15.	<p>AGCC Ref 4.29.4</p> <p>Jackpot Game Rules</p> <p>iv) The rules of a jackpot game should inform the customer of how the licensee/operator will address and resolve apparent simultaneous and multiple wins.</p> <p>v) The rules of the jackpot game should inform the player how the operator can discontinue or terminate a game. This includes planned terminations, such as jackpot offered for a specific period of time, and promotional jackpots.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure these requirements are satisfied.</p>	Licensee responsibility
16.	<p>AGCC Ref 4.29.5</p> <p>Jackpot parameter changes</p> <p>Once a Jackpot has commenced, parameter changes should not take effect immediately, rather they should be saved to apply after that Jackpot is next won. These are 'pending' parameters.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility
17.	<p>AGCC Ref 4.29.9</p> <p>Jackpot shutdown</p> <p>There are instances where a jackpot should be "shut down." A jackpot shut down requires the following actions:</p> <p>i) Clear indication should be given to customers that the jackpot is not operating (e.g. by displaying "Jackpot Closed" on end customer devices).</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure these requirements are satisfied.</p>	Licensee responsibility



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	<p>ii) It should not be possible for the jackpot to be won while in the shut down state.</p> <p>iii) If the jackpot operates in conjunction with another game (e.g. base game), and the customer return requirement is only met when jackpot contributions are included, the base game may only be offered when the jackpot is available.</p>		
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III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.



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UK Gambling Commission

UK Remote Gambling and Software Technical Standards
June 2017

Testing Strategy for Compliance with Remote Gambling and Software Technical Standards
June 2017

I. Complete requirements met by the tests

Requirements	Results
RTS 1 – Customer account information	Comply, subject to section VI. Observations below
RTS 2 – Displaying transactions	Comply, subject to section VI. Observations below
RTS 3 – Rules, game descriptions and the likelihood of winning	Comply, subject to section VI. Observations below
RTS 4 – Time-critical events	Not applicable
RTS 5 – Result determination	Comply, subject to section VI. Observations below
RTS 6 – Result determination for play-for-fun games	Comply, subject to section VI. Observations below
RTS 7 – Generation of random outcomes	Comply, subject to section VI. Observations below
RTS 8 – Auto-play functionality	Comply
RTS 9 – Progressive jackpot	Comply
RTS 10 – Interrupted gambling	Comply, subject to section VI. Observations below
RTS 11 – Limiting collusion/cheating	Not applicable
RTS 12 – Financial limits	Comply, subject to section VI. Observations below
RTS 13 – Time requirements and reality checks	Comply, subject to section VI. Observations below
RTS 14 – Responsible product design	Comply
RTS 15 – In-play betting	Not applicable
RTS 16 – Use of third party software	Not applicable
RTS 17 – Live dealer studios	Not applicable

II. Observations

1.	RTS requirement 1A Where customers hold a credit or debit balance, the pages or screens used for gambling and to move money into and out of accounts must display the customer's current account balance, in the currency of their account (e.g. dollars, euros or pounds sterling), whenever that customer is logged in.	Eyecon is a software provider. iTech Labs has verified the accuracy of game balance update, the availability and accuracy of game history data. Account balance related functions (including movement of funds between the account balance and the game, display	Licensee responsibility
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	<p>RTS Requirement 1B</p> <p>Customers must have easy access to at least three months account and gambling history without having to contact the licensee.</p> <p>A minimum of 12 months of gambling and account history must be made available on request. The ability to request this information should be made clear to customers and be provided as soon as is practicable.</p> <p>RTS Requirement 1C</p> <p>Customers must be able to access information about their net deposits.</p> <p>Net deposits are defined as the running total of all deposits minus the sum of all withdrawals for the lifetime of the account.</p> <p>This should be displayed at an account level so the figure represents the net position of all payment methods.</p> <p>Where full account lifetime history isn't possible then, as a minimum, the net deposits should be displayed from 1 April 2018, or the account opening date if after 1 April 2018.</p> <p>Information which explains the net deposit figure, including the timeframe it covers, should be provided.</p>	<p>of currency, account history, deposit/withdrawal) and presentation of game history to players, are the licensee's responsibility.</p>	
2.	<p>RTS requirement 2A</p> <p>The remote gambling system must make available clear information about the amount of money being gambled by the customer, including any conversions from one form of currency to another, or from currency to credits, chips or other tokens etc, at the point of conversion.</p> <p>RTS Requirement 2C</p> <p>The gambling system must be designed to enable customers to choose whether to automatically accept price fluctuations (in either direction) that occur after their bet is requested.</p>	<p>Eyecon is a software provider. Currency conversion and price fluctuations (if applicable) are the licensee's responsibility.</p>	<p>Licensee responsibility</p>
3.	<p>RTS Requirement 2B</p> <p>The gambling system must display sufficient relevant information about the customer's gamble so that the content of the gamble is clear. This information must be made available before the customer commits to the gamble, including for example, in the artwork and textual information displayed during gaming, or on an electronic equivalent of a betting slip or lottery ticket.</p> <p>RTS requirement 3A</p> <p>An explanation of the applicable rules must be easily available to the customer before they</p>	<p>Eyecon is a software provider. iTech Labs has verified the game rules to ensure the game works according to the rules. Presentation (appearance) of the game rules to players (including links to access the game rules) is the licensee's responsibility.</p>	<p>Licensee responsibility</p>

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	<p>commit to gamble. The content including artwork and text must be accurate, and sufficient to explain all of the applicable rules and how to participate. All reasonable steps must be taken to ensure that the content is understandable.</p> <p>RTS requirement 3B Where relevant, as the game or event progresses, information that may reasonably be expected to enable the customer to understand the current state must be displayed.</p> <p>RTS requirement 5A All reasonable steps should be taken to ensure that gambles are accepted, processed and settled in accordance with the operator's published terms and rules, and the rules of the specific game, event, or bet. Where unexpected system flaws, faults, or errors that affect the customer occur, steps are to be taken as soon as practicable to remedy the problem and ensure that the customer is treated fairly according to the circumstances.</p> <p>RTS requirement 7B As far as is reasonably possible, games and events must be implemented fairly and in accordance with the rules and prevailing payouts, where applicable, as they are described to the customer.</p>		
4.	<p>RTS Requirement 6A Play-for- free games must implement the same game rules as the corresponding play-for-money games offered on the same facilities (i.e the same website). Operators must take all reasonable steps to ensure that play-for-free games accurately represent the likelihood of winning and prize distribution in the play-for-money game. For the purpose of this requirement playing a game includes participating in a lottery and/or betting on a virtual event.</p>	<p>Eyecon is a software provider. It is the licensee's responsibility to ensure that this requirement is satisfied.</p>	<p>Licensee responsibility</p>
5.	<p>RTS requirement 7A Random number generation and game results must be 'acceptably random'. Acceptably random here means that it is possible to demonstrate to a high degree of confidence that the output of the RNG, game, lottery and virtual event outcomes are random, through, for example, statistical analysis using generally accepted tests and methods of analysis. Adaptive behaviour (ie a compensated game) is not permitted.</p>	<p>This certification report is for games only. RNG requirements are covered by a separate RNG certification.</p>	<p>Observation</p>
6.	<p>RTS requirement 7D The rules, payouts and outcome probabilities of a</p>	<p>Eyecon is a software provider. It is the licensee's responsibility</p>	<p>Licensee responsibility</p>



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	virtual event or game may not be changed while it is available for gambling, except as provided for in the rules of the game, lottery or virtual event. Such changes must be brought to customer's attention.	to ensure that this requirement is satisfied.	
7.	RTS Requirement 10C Operators must make available information about their policies regarding service interruptions in various different circumstances.	Eyecon is a software provider. It is the licensee's responsibility to ensure that this requirement is satisfied.	Licensee responsibility
8.	RTS 12 – Financial limits	Eyecon is a software provider. It is the licensee's responsibility to ensure that all requirements under RTS 12 are satisfied.	Licensee responsibility
9.	RTS 13 – Time requirements and reality checks	Eyecon is a software provider. It is the licensee's responsibility to ensure that all requirements under RTS 13 are satisfied.	Licensee responsibility

III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.

IV. Level of Certification

The game has passed all tests according to "Red" and "Green" testing requirements (as required for software providers) of UK Remote Gambling and Software Technical Standards – June 2017 for the requirements listed in section I above, subject to integration of the certified game into the live environment (or development/staging environment which is essentially the same as the live environment) and satisfactory verification of any licensee-specific functions not covered by this certification.

"Red" – Red category contains requirements which must be assessed by a third party (approved test lab).

"Green" – Green category contains requirements which are capable of being tested and verified by the licensee (or software provider).

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Gibraltar

Remote Technical and Operating Standards for the Gibraltar Gambling Industry
Gambling Commissioner's Guidelines - v.1.1.0

I. Complete requirements met by the tests

Requirements	Results
Standard 2 - Registration of participants and administration	
2.4.3 Game history	Comply, subject to section II. Observations below
2.4.4 Game history (betting)	Not applicable
Standard 3 – Presentation of rules and customer information	
3.4 Game rules and information	Comply, subject to section II. Observations below
3.5 Jackpots	Not applicable
3.6 Multi-customer games	Not applicable
3.7 Monitoring of rules	Comply, subject to section II. Observations below
Standard 7 – Fair gambling	
7.1 Game fairness	Comply, subject to section II. Observations below
7.2. 'Play for Free' games	Comply, subject to section II. Observations below
7.3. Compensated or adaptive games	Comply
7.4. No forced game play	Comply
7.5. Auto-play	Comply
7.6. Game control	Comply, subject to section II. Observations below
7.7. Incomplete games	Comply, subject to section II. Observations below
7.8. Game / website design	Comply
7.9. Poker / P2P games	Not applicable
7.10. Sports betting and integrity	Not applicable
Standard 9 – Business continuity	
9.1 General	Comply, subject to section II. Observations below
Standard 11 – Randomness	
11.1 RNG and game randomness	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
11.2 Mechanical RNGs	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
11.3 RNG failure	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
11.4 Verifiably fair	Not applicable (this report is a game certification report, RNG certification is not covered by this report)

II. Observations

No.	Description	Remarks	Notes
1.	RTOS 2.4.3	Eyecon is a licensed game and software	Licensee

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	Game History	<p>provider.</p> <p>iTech Labs has verified the presence of all game history elements and the accuracy aspect of the history (i.e. completed games are accurately recorded in the game history).</p> <p>Presentation (appearance) of game history to players is the licensee's responsibility.</p>	responsibility
2.	RTOS 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.	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's obligation to make sure this requirement is satisfied.</p>	Licensee responsibility
3.	RTOS 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.	<p>Eyecon is a licensed game and software provider.</p> <p>'play for fun' offer is the licensee's responsibility.</p> <p>It is the licensee's obligation to make sure this requirement is satisfied.</p>	Licensee responsibility
4.	RTOS 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 customers have incomplete games, etc). RTOS 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. RTOS 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.	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's obligation to make sure these requirements are satisfied.</p>	Licensee responsibility
5.	RTOS 7.1.1 Licence holders should make information available to customers on their website(s) about their testing and quality	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's obligation to make sure these requirements are satisfied.</p>	Licensee responsibility

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	<p>assurance arrangements in place to assure fairness and randomness in their gaming products, including information about testing/certification by an ATF where applicable and where this can be accessed.</p> <p>RTOS 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.</p>		
6.	<p>RTOS 7.2 'Play for Free' Games</p>	<p>Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility
7.	<p>RTOS 7.6.1 It should be possible for the licence holder to disable any game or game session.</p> <p>RTOS 7.6.2 The licence holder should be able to provide full audit trails when disabling a game that is currently in play.</p>	<p>Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure these requirements are satisfied.</p>	Licensee responsibility
8.	<p>RTOS 7.7.1 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: c) Game disabled by licence holder.</p>	<p>Eyecon is a licensed game and software provider. Game disable functions are the licensee's responsibility. It is the licensee's obligation to make sure this requirement is satisfied.</p>	Licensee responsibility
9.	<p>RTOS 9.1.5 Recorded transaction information involving customer funds should be recoverable by the system in the event of a failure or malfunction.</p>	<p>Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility

III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.

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Isle of Man

IOM Online Gambling (Systems Verification) (No. 2)
Regulations 2007

I. Complete requirements met by the tests

Requirements	Results
Schedule 1 – General	
OGSV Schedule 1 – 1	
OGSV Schedule 1 – 1a	Comply
OGSV Schedule 1 – 1b	Comply
OGSV Schedule 1 – 1c	Comply
OGSV Schedule 1 – 1d	Not applicable
OGSV Schedule 1 – 2	Comply, subject to section II. Observations below
Schedule 1 – Randomness	
OGSV Schedule 1 – 3	
OGSV Schedule 1 – 3a	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 3b	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 3c	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 4	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
OGSV Schedule 1 – 5	Comply
OGSV Schedule 1 – 6	Comply
OGSV Schedule 1 – 7	
OGSV Schedule 1 – 7a	Comply
OGSV Schedule 1 – 7b	Comply
OGSV Schedule 1 – 7c	Comply
OGSV Schedule 1 – 7d	Comply
OGSV Schedule 1 – 7e	Comply
OGSV Schedule 1 – 7f	Comply
OGSV Schedule 1 – 7g	Comply
Schedule 1 – Reporting Requirements	
OGSV Schedule 1 – 8	Comply, subject to section II. Observations below
OGSV Schedule 1 – 9	
OGSV Schedule 1 – 9a	Comply, subject to section II.



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	Observations below
OGSV Schedule 1 – 9b	Comply, subject to section II. Observations below
OGSV Schedule 1 – 10	
OGSV Schedule 1 – 10a	Comply
OGSV Schedule 1 – 10b	Comply
OGSV Schedule 1 – 10c	Comply
OGSV Schedule 1 – 10d	Comply
OGSV Schedule 1 – 10e	Comply
OGSV Schedule 1 – 10f	Comply
OGSV Schedule 1 – 10g	Comply
OGSV Schedule 1 – 10h	Comply
OGSV Schedule 1 – 10i	Comply
OGSV Schedule 1 – 10j	Comply
OGSV Schedule 1 – 11	
OGSV Schedule 1 – 11a	Comply, subject to section II. Observations below
OGSV Schedule 1 – 11b	Comply, subject to section II. Observations below
OGSV Schedule 1 – 11c	Comply, subject to section II. Observations below
OGSV Schedule 1 – 11d	Comply, subject to section II. Observations below
Schedule 2 – Betting	
OGSV Schedule 2 – 1	Not applicable
OGSV Schedule 2 – 2	
OGSV Schedule 2 – 2a	Not applicable
OGSV Schedule 2 – 2b	Not applicable
OGSV Schedule 2 – 2c	Not applicable
OGSV Schedule 2 – 2d	Not applicable
OGSV Schedule 2 – 3	Not applicable
OGSV Schedule 2 – 4	
OGSV Schedule 2 – 4a	Not applicable
OGSV Schedule 2 – 4b	Not applicable
OGSV Schedule 2 – 5	
OGSV Schedule 2 – 5a	Not applicable
OGSV Schedule 2 – 5b	Not applicable
OGSV Schedule 2 – 5c	Not applicable
OGSV Schedule 2 – 5d	Not applicable
OGSV Schedule 2 – 5e	Not applicable
OGSV Schedule 2 – 5f	Not applicable
OGSV Schedule 2 – 5g	Not applicable

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OGSV Schedule 2 – 5h	Not applicable
OGSV Schedule 2 – 6	Not applicable
OGSV Schedule 2 – 7	Not applicable
OGSV Schedule 2 – 8	Not applicable
OGSV Schedule 2 – 9	Not applicable

II. Observations

No.	Description	Remarks	Notes
1.	OGSV Schedule 1 – 2 Both the Online Gambling and financial transactions software must be congruent and secure.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
2.	OGSV Schedule 1 – 8 All financial reports produced by the System must be readily reconcilable with Gaming or Lottery transaction reports (as relevant) and conversely. All such reports shall be freely available to the Commissioners.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
3.	OGSV Schedule 1 – 9 The System must: a) be capable of producing auditable and aggregated financial statements of Gaming and/or Lottery transactions (as relevant). b) calculate accurately all excise of duty payable under the Act and other monies due to the Treasury under the Act.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
4.	OGSV Schedule 1 – 11 The System must maintain information about significant events as follows: a) large wins (as agreed by the Commissioners from time to time); b) transfers of funds (between Participants or between any Participant and the Operator) in excess of such amount as the Commissioners may from time to time direct by notice in writing to the Operator; c) material changes made by the Operator to Game and/or Lottery returns, disclosed under paragraph 7 above; and d) material fluctuations in theoretical/estimated statistical return to Participants (agreed with the Commissioners from time to time).	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility



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III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.

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Malta

Malta Remote Gaming Regulations S.L.438.04

I. Complete requirements met by the tests

Requirements	Results
Part X – Aborted and Miscarried Games	
Part X – 47.1	Comply
Part X – 47.2	Not applicable
Part X – 48	Comply, subject to section II. Observations below
Third Schedule – Regulation 25 Technical Requirement for Gaming System	
Third Schedule – 1	
Third Schedule – 1a	Comply
Third Schedule – 1b	Comply, subject to section II. Observations below
Third Schedule – 2	Comply, subject to section II. Observations below
Third Schedule – 3	
Third Schedule – 3a	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
Third Schedule – 3b	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
Third Schedule – 3c	Not applicable (this report is a game certification report, RNG certification is not covered by this report)
Third Schedule – 4	Comply
Third Schedule – 5	Comply
Third Schedule – 6	
Third Schedule – 6a	Comply
Third Schedule – 6b	Comply
Third Schedule – 6c	Comply
Third Schedule – 6d	Comply
Third Schedule – 6e	Comply
Third Schedule – 6f	Comply
Third Schedule – 7	Comply, subject to section II. Observations below
Third Schedule – 8	
Third Schedule – 8a	Comply, subject to section II. Observations below
Third Schedule – 8b	Comply, subject to section II. Observations below
Third Schedule – 9	
Third Schedule – 9a	Comply
Third Schedule – 9b	Comply
Third Schedule – 9c	Comply
Third Schedule – 9d	Comply
Third Schedule – 9e	Comply
Third Schedule – 9f	Comply

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Third Schedule – 9g	Comply
Third Schedule – 9h	Comply
Third Schedule – 9i	Comply
Third Schedule – 10	
Third Schedule – 10a	Comply, subject to section II. Observations below
Third Schedule – 10b	Comply, subject to section II. Observations below
Third Schedule – 10c	Comply, subject to section II. Observations below

II. Observations

No.	Description	Remarks	Notes
1.	<p>Part X – 48</p> <p>(1) If a game is started but miscarries because of a failure of the licensee's computer operating system, the licensee shall:</p> <p>(a) (i) refund the amount wagered in the game to the player by crediting it to the player's account or, if the account no longer exists, by paying it to the player in an approved manner; and</p> <p>(a) (ii) if the player has an accrued credit at the time the game miscarries, credit to the player's account the monetary value of the credit or, if the account no longer exists, pay it to the player in an approved manner;</p> <p>(b) inform immediately the Authority of the circumstances of the incident;</p> <p>(c) refrain from conducting a further game if the game is likely to be affected by the same failure:</p> <p>Provided that the Authority may, by written notice to the licensee, give the licensee other directions which the Authority considers appropriate in the circumstances.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility
2.	<p>Third Schedule – 1</p> <p>The gaming system must:</p> <p>(b) provide over time no more than the expected house advantage to the operator.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility
3.	<p>Third Schedule – 2</p> <p>Both the gaming and financial transactions must be congruent and secure.</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility
4.	<p>Third Schedule – 7</p> <p>All financial reports produced by the gaming system must be congruent with gaming transaction reports and conversely: Provided that all such reports shall be readily and freely</p>	<p>Eyecon is a licensed game and software provider.</p> <p>It is the licensee's responsibility to make sure this requirement is satisfied.</p>	Licensee responsibility

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	available to the Authority.		
5.	Third Schedule – 8 The gaming system must: (a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and (b) calculate accurately all taxation and other monies due to the Authority.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility
6.	Third Schedule – 10 The gaming system must maintain information about significant events as follows: (a) large wins; (b) transfers of funds in excess of such amount as the Authority may from time to time direct by notice in writing to the operator; (c) changes made by the operator to game parameters.	Eyecon is a licensed game and software provider. It is the licensee's responsibility to make sure this requirement is satisfied.	Licensee responsibility

III. Conditions

Before the game is released to production, all licensee-responsibility items listed under **II. Observations** must be satisfied by the licensee.