



Verification report: ITL2203720

Eyecon Alderney Limited

Highland Reels Recertification Report

01 December 2022

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I. General information

No.	Description	Details								
1.	Identification	Highland Reels								
2.	Verification body issuing the certificate (test house)	<p>iTech Labs Suite 24, 40 Montclair Ave Glen Waverley, VIC 3150, Australia URL: http://www.itechlabs.com E-mail: info@itechlabs.com</p> <p>iTech Labs is accredited to ISO/IEC 17025 by National Association of Testing Authorities (NATA), Australia to undertake compliance testing and audits of online Gaming systems. iTech Labs accreditation (#15690) details can be downloaded from NATA website. NATA has entered into a mutual recognition agreement and/or multilateral agreement of accreditation with ILAC and is in the list of Signatories to the ILAC Mutual Recognition Arrangements.</p> <p>All assessments in the following sections of this report are provided under ISO/IEC 17025 except where otherwise stated.</p>								
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 4.5UK Gambling Commission UK Remote Gambling and Software Technical Standards – February 2021 Testing Strategy for Compliance with Remote Gambling and Software Technical Standards – February 2021Gibraltar 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 LEGAL NOTICE (L.N.) 131 of 2016 Directive 2 of 2018 - Player Protection Directive - V2 May 2021 <p>Please refer to Appendix at the end of this report for details</p>								
4.	Target jurisdiction	Alderney, UK, Gibraltar, Isle of Man, Malta								
5.	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>Highland Reels*</td><td>Slot</td><td>HTML5: (Desktop & Mobile)</td></tr></table> <p>*One variant: with Jackpot</p>	No.	Game Name	Game Type	Channel	1.	Highland Reels*	Slot	HTML5: (Desktop & Mobile)
No.	Game Name	Game Type	Channel							
1.	Highland Reels*	Slot	HTML5: (Desktop & Mobile)							

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6.	Type of the module tested	Casino Games
7.	Produced by	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL Contact: Robert Black (robert.black@eyecon.com)
8.	Licensee details	Not applicable
9.	Date of request for verification	07 October 2022
10.	Date of completion	01 December 2022
11.	Platform supplier	Eyecon Alderney Limited
12.	Platform version	Version: 3.7.1
13.	RNG used for testing	1.0.1 REF: EYE-RNG_20160025 for AGCC, UKGC and IOM Eyecon.1004.07 - RNG Malta for Malta Eyecon.1004.07 - RNG Gibraltar for Gibraltar
14.	Other records	Highland Reels has been previously certified for AGCC, UK, Gibraltar, Isle of Man and Malta by iTech Labs (REF: ITL2100052). This round of certification is to re-certify the game due to the following changes: <ul style="list-style-type: none">• evaluate and update the accuracy of RTP from the certified 89.933% to 89.988% (a difference of 0.055%);• Critical files have changed to accommodate other games (i.e. changes are not related to Highland Reels) The changes do not affect the game logic. Testing was conducted on the following devices: <ul style="list-style-type: none">• Desktop• iPhone XS MAX (Browser: Safari)• Samsung Galaxy S10 (Browser: Chrome)• iPad Mini 4 (Browser: Safari)• Samsung Galaxy Tab 4 (Browser: Chrome)

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



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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>Highland Reels WEB JP</div> <table><tr><th>Front End</th><th>Rules</th></tr><tr><td>com.eyecon.orion.games.sl ot-highland-reels</td><td>carbine- slots_highlandReels_90_jack pot-config</td></tr><tr><td>Version: 4.2.3</td><td>Version: 1.0.8</td></tr><tr><td>SHA1: 44beedccb35da9a7662c5d1 cb1513b16a1995d4e</td><td>SHA1: c921533c336c810aecba7342 21f76e442eeefba5</td></tr></table> <div>Highland Reels WEB JP</div> <table><tr><th>File Name</th></tr><tr><td>carbine-game-engine-5.8.1-sources.jar</td></tr><tr><td>EvaluationChain.java</td></tr><tr><td>ReelSymbolExpander.java</td></tr><tr><td>CountSymbolEvaluator.java</td></tr><tr><td>LinesWinMultiPatterEvaluator.java</td></tr><tr><td>PatternMatchingEvaluator.java</td></tr><tr><td>PrizeLinePatternMatchingEvaluator.java</td></tr><tr><td>RebetsLineWinPatternMatchingEvaluator.java</td></tr><tr><td>DisplayGenerator.java</td></tr><tr><td>RebetDetailBuilder.java</td></tr><tr><td>RebetEvaluator.java</td></tr><tr><td>ReelStripGenerator.java</td></tr><tr><td>ResetRebetEvaluator.java</td></tr><tr><td>PrizeLineTriggerEvaluator.java</td></tr><tr><td>TriggerRandomMultiplierEvaluator.java</td></tr><tr><td>CarbineGame.java</td></tr><tr><td>CarbineGameComponent.java</td></tr><tr><td>GameWinsCalculatorImpl.java</td></tr><tr><td>PrizeMultiplier.java</td></tr><tr><td>RetriggerCount.java</td></tr><tr><td>EyeconSpinGameRules.java</td></tr><tr><td>Multiplier.java</td></tr><tr><td>RngSequences.java</td></tr><tr><td>SlotGameVariableConfigurationImpl.java</td></tr><tr><td>SymbolHoldSpinGame.java</td></tr><tr><td>SymbolHoldSpinRuleImpl.java</td></tr><tr><td>SymbolHoldSpinScreenEvaluator.java</td></tr><tr><td>SymbolHoldTriggerEvaluator.java</td></tr><tr><td>SymbolSwapSpinShapeEvaluator.java</td></tr><tr><td>SymbolSwapSpinTriggerEvaluator.java</td></tr><tr><td>carbine-slots_highlandReels_95_standard-1.0.2-config.jar</td></tr></table>	Front End	Rules	com.eyecon.orion.games.sl ot-highland-reels	carbine- slots_highlandReels_90_jack pot-config	Version: 4.2.3	Version: 1.0.8	SHA1: 44beedccb35da9a7662c5d1 cb1513b16a1995d4e	SHA1: c921533c336c810aecba7342 21f76e442eeefba5	File Name	carbine-game-engine-5.8.1-sources.jar	EvaluationChain.java	ReelSymbolExpander.java	CountSymbolEvaluator.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_highlandReels_95_standard-1.0.2-config.jar
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		carbine-slots_highlandReels_95_standard-1.0.2.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.	Highland Reels	Slot	Highland Reels is a 5 reel video slot with 2 prize pick features and a free games feature. All symbols pay Left to Right except scattered Scotsman and Hammer symbols, which pay Any.	£ 0.01	£50.00

*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.	Highland Reels	89.988% + Jackpot 3.0%	89.961% + Jackpot 3.0%

*Verified the RTP only up to 2 decimals accuracy.

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

Highland Reels WEB JP

File Name	SHA-1
carbine-game-engine-5.8.1.jar	6fc11cd779bfcec2336ce0b9d5bf21d9c4415c96
EvaluationChain.class	1473556ef50199b63af5188de2834492102467d2
ReelSymbolExpander.class	eed9eef1fb90819b55f1101de7eb697b29d21ad2
CountSymbolEvaluator.class	9460b7f9550c31d34f2887da0477dca2db5cde8f
LinesWinMultiPatterEvaluator.class	d6410476d2506ce7072553aebc4b5d6704c754e2
PatternMatchingEvaluator.class	58462aad62bbfc2c7722211401b2d27b6aec410
PrizeLinePatternMatchingEvaluator.class	251e569cd2a62e1509c5b18178d1361b95550cc3
RebetsLineWinPatternMatchingEvaluator.class	67170b11b8690bd857952b277354d583b9142a48
DisplayGenerator.class	30c07d28fe504466491dbc8ad048b346e72bb872
RebetDetailBuilder.class	435bf790a162a09d65f8ced534416ff1858ecca6
RebetEvaluator.class	704982eaaaf98363c118af8708f4b18f803e468
ReelStripGenerator.class	153d3c51aa7ba050ed0e248c0e002cafed1d6620
ResetRebetEvaluator.class	772b2a40d8dd8dceaf62400a52fb7c6361cb7102
PrizeLineTriggerEvaluator.class	2b5b33a7020723f05b42939172b9d1ab56bb8a3b
TriggerRandomMultiplierEvaluator.class	01ddf4e181d644a7dc83cfd715e945bdfad6b28

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CarbineGame.class	63e1a0c1c310e747a8f310c1fa7a95decfd27219
CarbineGameComponent.class	7dba8ecab8a4f63737ea9d576426be3ff953d06a
GameWinsCalculatorImpl.class	921e30a61c8e7a1b655b08dd6740bf8073ffdce1
PrizeMultiplier.class	bd6f19cb863832b39ed3b419f985237b0fb5b904
RetriggerCount.class	0ad82a0a3d20818fd921279d265730760a5b844c
EyeconSpinGameRules.class	cc7e5af739a1e7a19089fea113f78412e8a1082d
Multiplier.class	b38433bd179e64ecba3b249b40a1a2e6b0496e32
RngSequences.class	6f5f7781221a0129e7fdb9056eb115c683b7c09c
SlotGameVariableConfigurationImpl.class	da158601773b9eab4ca70746c714e705c4cee01c
SymbolHoldSpinGame.class	d1b793d286966d9c7df7062eab4d1b8fa64e4eb5
SymbolHoldSpinRuleImpl.class	4f223ffacdc2468ed31cc1572b6476792350331e
SymbolHoldSpinScreenEvaluator.class	aac195e2abdd33e5d237ec71ed41a046ce2cfd2
SymbolHoldTriggerEvaluator.class	e9898a28a6426c0e885f9b00ce0e30c9e9634a3f
SymbolSwapSpinShapeEvaluator.class	6aad79ec0c347e75094c002c9485699e3fd3639b
SymbolSwapSpinTriggerEvaluator.class	f3d97647f90aa2829eefc9816844315c3c8e2c31
carbine-slots_highlandReels_90_jackpot-1.0.8-config	c921533c336c810aecba734221f76e442eeefba5
carbine-slots_highlandReels_90_jackpot-1.0.8.json	be1243f427350194e73fc42391887f92dcca7c7f
pool-server-service-1.4.0.jar	5c04284c1ebc8524c311d890d84bcbdbf2731f3d
MysteryPoolImpl.class	150d5300a805e32d2f3e534b8f082eb37e45d901
ProbabilityPoolImpl.class	1a0376e7a885ef3ddc2b381362f70cd35b24f03c

IV. Details of tests

Product identification: Highland Reels

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.	Functional tests	Functional tests were conducted to verify that the game satisfies the relevant requirements in the standards.	Passed
3.	Emulation tests	Emulation tests were conducted to verify that the game payouts are in accordance with the payable and maths.	Passed
4.	Theoretical RTP	Theoretical RTP verification was conducted for the game. See section III.4 above.	Passed
5.	Simulated RTP	RTP simulations using the game code were conducted for the game. See section III.4 above.	Passed
6.	Source code review	Source code examination was performed on critical components of the software to ensure that the game complies 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
Mobile			
1.	Game rules & artwork evaluation (as required for mobile-specific	Evaluation of game rules and artwork was conducted for mobile-specific components to ensure that they	Passed



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	components)	satisfy relevant requirements in the standards and the game does work according to the game rules and artwork.	
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 paytable.	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>Highland Reels has been previously certified for AGCC, UK, Gibraltar, Isle of Man and Malta by iTech Labs (REF: ITL2100052).</p> <p>This round of certification is to re-certify the game due to the following changes:</p> <ul style="list-style-type: none"> • evaluate and update the accuracy of RTP from the certified 89.933% to 89.988% (a difference of 0.055%); • Critical files have changed to accommodate other games (i.e. changes are not related to Highland Reels) <p>The changes do not affect the game logic.</p> <p>Testing was conducted on the following devices:</p> <ul style="list-style-type: none"> • Desktop • iPhone 5S/6S (Browser: Safari) • Samsung Galaxy S7 (Browser: Chrome) • iPad Mini 4 (Browser: Safari) • Samsung Galaxy Tab 4 (Browser: Chrome) 	Not applicable

Note: Evaluation was conducted at iTech Labs facilities in Australia, India and Bulgaria. All functional tests (if any) were conducted remotely (i.e. remote test environment hosted on customer's site).


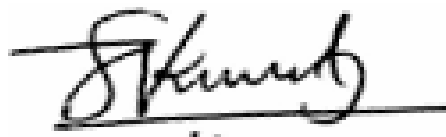
V. Final declaration and conformity

No.	Description	Details
1.	Certification	<p>Date of certification: 01 December 2022</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 Highland Reels complies with the relevant requirements (as applicable for software providers) listed in Appendix below.</p> <p>iTech Labs recommends that Highland Reels be approved for deployment.</p>



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Signatures:

Authorised by:  <hr/> Alvin Rizaldi Senior Consultant iTech Labs 01 December 2022	Signed by:  <hr/> Kiren Sreekumar Principal Consultant iTech Labs 01 December 2022
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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 4.5

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	Operator responsibility
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	Operator responsibility
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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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.	Operator 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.	Operator 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.	Operator 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.	Operator 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.	Operator 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.	Operator responsibility
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	Operator responsibility

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		satisfied.	
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.	Operator 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.	Operator 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.	Operator 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.	Operator 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.	Operator 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 for all prizes. g) Details of any amount transferred to or from the session balance, but before the next play. h) Any player choices involved in play outcome	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.	Operator responsibility

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	<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 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>	Operator responsibility
15.	<p>AGCC Ref 4.29.4 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>	Operator responsibility
16.	<p>AGCC Ref 4.29.5 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>	Operator responsibility
17.	<p>AGCC Ref 4.29.9 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>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</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>	Operator responsibility



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	customer return requirement is only met when jackpot contributions are included, the base game may only be offered when the jackpot is available.		
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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
February 2021

Testing Strategy for Compliance with Remote Gambling and Software Technical Standards
February 2021

I. Complete requirements met by the tests

Requirements	Results
RTS 1 – Customer account Information	
RTS requirement 1A	Operator responsibility*
RTS requirement 1B	Operator responsibility*
RTS requirement 1C	Operator responsibility*
RTS 2 – Displaying transactions	
RTS requirement 2A	Comply, except for currency conversion and price fluctuations (if applicable) which are the operator's responsibility*.
RTS requirement 2B	Comply, the game rules have been verified 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 operator's responsibility*.
RTS requirement 2C	Operator responsibility*
RTS requirement 2D	Operator responsibility*
RTS requirement 2E	Comply
RTS 3 – Rules, game descriptions and the likelihood of winning	
RTS requirement 3A	Comply, the game rules have been verified 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 operator's responsibility*.
RTS requirement 3B	Comply, the game rules have been verified 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 operator's responsibility*.
RTS requirement 3C	Comply except for RTS 3C ii and RTS 3C iv which are not applicable, the game rules have been verified 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 operator's responsibility*.
RTS requirement 3D	Comply, the game rules have been verified 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 operator's responsibility*.
RTS 4 – Time critical events	
RTS requirement 4A	Not applicable, no time critical events.
RTS requirement 4B	Not applicable, no time critical events.

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RTS 5 – Result Determination	
RTS requirement 5A	Comply, the game rules have been verified 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 operator's responsibility*.
RTS 6 – Result determination for play-for-free games	
RTS requirement 6A	Comply
RTS 7 – Generation of random outcomes	
RTS requirement 7A	Covered by a separate RNG certification
RTS requirement 7B	Comply, the game rules have been verified 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 operator's responsibility*.
RTS requirement 7C	Comply
RTS requirement 7D	Comply
RTS requirement 7E	Comply
RTS 8 – Auto-play functionality	
RTS requirement 8A	Not applicable
RTS requirement 8B	Not applicable
RTS requirement 8C	Comply
RTS 9 – Progressive jackpot systems	
RTS requirement 9A	Comply
RTS requirement 9B	Comply
RTS 10 – Interrupted gambling	
RTS 10 - 10A	Operator responsibility*
RTS 10 – 10B	Comply
RTS 10 – 10C	Operator responsibility*
RTS 11 – Limiting collusion/cheating	
RTS 11 - 11A	Not applicable, the module tested is not P2P.
RTS 11 – 11B	Not applicable, the module tested is not P2P.
RTS 12 – Financial limits	
RTS 12 - 12A	Operator responsibility*
RTS 12 – 12B	Operator responsibility*
RTS 13 – Time requirements and reality checks	
RTS 13 - 13A	Operator responsibility*
RTS 13 – 13B	Operator responsibility*
RTS 13 – 13C	Comply
RTS 14 – Responsible product design	



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RTS 14 - 14A	Comply
RTS 14 – 14B	Not applicable, the module tested is not platform.
RTS 14 – 14C	Operator responsibility*
RTS 14 – 14D	Comply
RTS 14 – 14E	Comply
RTS 14 – 14F	Comply
RTS 15– In-play betting	
RTS 15- 15A	Not applicable, the module tested is not 'betting'.
RTS 16– Use of third party software	
RTS 16-16A	Not applicable, the module tested is not P2P.
RTS 16-16B	Not applicable, the module tested is not P2P.
RTS 16-16C	Not applicable, the module tested is not P2P.
RTS 17– Live dealer studios	
RTS 17-17A	Not applicable, the module tested is not 'live'.

*Eyecon is a software provider. It is the operator's responsibility to ensure that these requirements are satisfied.

II. Observations

None.

III. Conditions

This round of certification is for game only. RNG and Platform requirements are out of scope.
Eyecon is a software provider.
Before the game is released to production, all operator-responsibility items listed under **I. Complete requirements met by the tests** must be satisfied by the operator.

IV. Level of Certification

Highland Reels has passed all tests according to testing requirements (as required for software providers) of the two categories in UK Remote Gambling and Software Technical Standards - February 2021, 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 operator-specific functions not covered by this certification as indicated in Section I. Complete requirements met by the tests.

Note - the two categories of testing requirements are:

"testing requirements that require external testing" – these must be assessed by a third party (approved test lab).

"testing requirements that do not require external testing" – these are capable of being tested and verified by the operator (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	Operator responsibility
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	Comply
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	Game fairness
7.3. Compensated or adaptive games	Comply
7.4. No forced game play	Comply
7.5. Auto-play	Comply
7.6. Game control	Game fairness
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	Operator

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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>	Operator 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>	Operator 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>	Operator 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>	Operator 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>	Operator 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>	Operator 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>	Operator 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>	Operator 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	Operator responsibility
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	Operator responsibility
OGSV Schedule 1 – 9	
OGSV Schedule 1 – 9a	Operator responsibility
OGSV Schedule 1 – 9b	Operator responsibility
OGSV Schedule 1 – 10	



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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	Operator responsibility
OGSV Schedule 1 – 11b	Operator responsibility
OGSV Schedule 1 – 11c	Operator responsibility
OGSV Schedule 1 – 11d	Operator responsibility
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
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

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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.	Operator 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.	Operator 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.	Operator 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.	Operator 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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Malta

Malta Remote Gaming Regulations S.L.438.04

LEGAL NOTICE (L.N.) 131 of 2016

Directive 2 of 2018 - Player Protection Directive - V2 May 2021

I. Complete requirements met by the tests

Requirements	Results
Part IX	
Part IX - 45	Comply
Part IX – 46A (1)	Superseded by: Directive 2 of 2018 - Player Protection Directive - V2 May 2021 Part VII – Return to Player - Requirement 22
Part X – Aborted and Miscarried Games	
Part X – 47.1	Comply
Part X – 47.2	Not applicable
Part X – 48	Operator responsibility
Third Schedule – Regulation 25 Technical Requirement for Gaming System	
Third Schedule – 1	
Third Schedule – 1a	Comply
Third Schedule – 1b	Operator responsibility
Third Schedule – 2	Operator responsibility
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	Operator responsibility
Third Schedule – 8	
Third Schedule – 8a	Operator responsibility
Third Schedule – 8b	Operator responsibility

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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
Third Schedule – 9g	Comply
Third Schedule – 9h	Comply
Third Schedule – 9i	Comply
Third Schedule – 10	
Third Schedule – 10a	Operator responsibility
Third Schedule – 10b	Operator responsibility
Third Schedule – 10c	Operator responsibility
Directive 2 of 2018 - Player Protection Directive V2 May 2021	
Part III – Terms and Conditions	
Part III – 7. (1)	Comply
Part III – 7. (1) (a)	Comply
Part III – 7. (2)	Comply
Part III – 8	Not applicable
Part VII – Return to Player	
Part VII – 22	Comply

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</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>	Operator responsibility

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	<p>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>		
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>	Operator 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>	Operator 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 available to the Authority.</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>	Operator responsibility
5.	<p>Third Schedule – 8</p> <p>The gaming system must:</p> <p>(a) be capable of producing monthly auditable and aggregate financial statements of gaming transactions, and</p> <p>(b) calculate accurately all taxation and other monies due to the Authority.</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>	Operator responsibility
6.	<p>Third Schedule – 10</p> <p>The gaming system must maintain information about significant events as follows:</p> <p>(a) large wins;</p> <p>(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;</p> <p>(c) changes made by the operator to game 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>	Operator responsibility

III. Conditions

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