

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

Manufacturer:	Eyecon Alderney Limited
ATF Report Number:	MAL.EYECON.1009.01.02
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BMM Spain Testlabs, s.l.u.

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Evaluation Report

Client name & Address:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Client Reference Number:	Client Submission Letter Dated 21 st October 2019
Testing dates:	Start date: 25 th November 2019 End date: 31 st January 2020
Product / Game Description:	Eyecon Gaming Products (2 Online Games)
Test Category:	Category 0
Jurisdictions Recommended:	Malta
Technical Standard used for Evaluation:	- Legal Notice 176 of 2004 of the Lotteries and other Games Act as amended by Legal Notice 110 of 2006, 270 and 426 pf 2007, 90 of 2011 and 131 of 2016 - Directive 2 of 2018 - Player Protection Directive
Location where test was performed:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés Barcelona (España)
Location where report was issued:	BMM Spain Testlabs, s.l.u. Edificio Vinson del Parque Empresarial Vallsolana Camí de Can Camps, 17-19 08174 Sant Cugat del Vallés Barcelona (España)
Conclusion:	Pass
BMM Reference Number:	EYECON.1009
Method/Procedures used:	EURAF-SPA-MO-04 V4.4
Consultant(s):	Gerard Moreno, Enric Ferrés

1. SCOPE OF EVALUATION.

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

- Legal Notice 176 of 2004 of the Lotteries and other Games Act as amended by Legal Notice 110 of 2006, 270 and 426 of 2007, 90 of 2011 and 131 of 2016
- Directive 2/2018 - Player Protection Directive

2. EVALUATION CHARACTERISTICS.

2.1. GAME DESCRIPTION

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

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

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

2.1.2. White Wizard Deluxe (DH, MH)

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

2.2. EVALUATED OBJECT IDENTIFICATION

Game Name	Description	File Name	SHA-1 Signature
Heartburst DH	Client	slot-heartburst-2.0.10.zip	91884CF429BD36CB5E863A074D958E59C6F3984D
	Rules	carbine-slots_heartburst_95_standard-3.1.6-config.jar	B8AB5CEDD051EE41903AE005044A397C205AFF37
Heartburst DH JP	Client	slot-heartburst-2.0.10.zip	91884CF429BD36CB5E863A074D958E59C6F3984D
	Rules	carbine-slots_heartburst_92_jackpot-3.1.6-config.jar	8EB43382AB07F4EE27B324438188F147D8BCC058
Heartburst MH	Client	slot-heartburst-5.0.17.zip	A645C7921EC2D7C366DA68330AC8D12C1178CFB9
	Rules	carbine-slots_heartburst_95_standard-3.1.6-config.jar	B8AB5CEDD051EE41903AE005044A397C205AFF37
Heartburst MH JP	Client	slot-heartburst-5.0.17.zip	A645C7921EC2D7C366DA68330AC8D12C1178CFB9
	Rules	carbine-slots_heartburst_92_jackpot-3.1.6-config.jar	8EB43382AB07F4EE27B324438188F147D8BCC058
White Wizard Deluxe DH	Client	slot-white-wizard-deluxe-2.0.8.zip	2DF9C43AF90BB8F5BFB0284F26909F5198CF0B46
	Rules	carbine-slots_whiteWizardDeluxe_95_standard-	2D07411C678D6822FF4B25194B4B04E2EB31A3B0

Game Name	Description	File Name	SHA-1 Signature
		3.1.4-config.jar	
White Wizard Deluxe MH	Client	slot-white-wizard-deluxe-5.0.6.zip	CE2691815D47432E42CC7FB73713895CC791F5C5
	Rules	carbine-slots_whiteWizardDeluxe_95_standard-3.1.4-config.jar	2D07411C678D6822FF4B25194B4B04E2EB31A3B0

2.3. GAME PERCENTAGE VARIATION DETAILS

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

Note: (*) denotes items under test

3. BMM EVALUATION PERFORMED.

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

Player Protection Directive n. 2/2018	Results		
	OK	Fail	Observations
Part II			
Disclosure Requirements			
2.6) B2C licensees who market their services in one or more languages beside the English and/or Maltese language, shall ensure that all the information required to be displayed by virtue of this Directive, is available in that, or those, foreign languages, as well as the English and, or Maltese language.	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
2.7) For the avoidance of doubt, any website operated by a B2C licensee, or on his or her behalf, and all the content on such website, shall, as a minimum, be available in the English and, or Maltese language.	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
Part III			
Terms and Conditions			
7.1.a) A B2C licensee shall make readily available to players the rules of the games which it is offering: (a) B2C licensees offering their gaming service online shall ensure that the game rules are made readily available to the player. Licensees shall ensure that the game rules are to be displayed in full no more than one click away from the page in which the game can be played. With respect to games which are played after being downloaded and installed on a compatible device, licensees shall ensure that the game rules shall be made present to the player in any	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.

Player Protection Directive n. 2/2018	Results		
	OK	Fail	Observations
case prior to the player's first wager on the game. This paragraph is equally applicable to mobile sites and to mobile device applications.			
7.1.b) B2C licensees offering their gaming service by remote means other than online shall make the game rules readily available and shall inform the player how these may be accessed, in any case prior to the player's first wager on the game.	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
7.2) The game rules shall be written in plain and intelligible language and shall include inter alia the various ways in which the player can win or lose and, without prejudice to Part VII of this directive, the prize which the player is eligible to receive in case of a win in each case.	✓	<input type="checkbox"/>	
Part VI			
Player Activity and Support			
16.3.a) The B2C licensees offering their gaming service online shall make the following information readily available and easily accessible to the player to which it pertains: (a) the balance on the player's account, and the relevant currency, both of which shall also be visible at all times; Note: where the game is displayed on a screen, the B2C licensee shall cause to be displayed on the screen, at all times during a game, a counter which automatically updates and shows the player's account balance.	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
16.3.b) The ability to access the player's gambling history of the immediately preceding six months, including total deposits, withdrawals, win/loss transactions	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.

Player Protection Directive n. 2/2018	Results		
	OK	Fail	Observations
and total net position; Note: Provided that all amounts displayed relating to wagers and winnings shall be quoted with the symbol of currency that the player is playing with. Provided further that, the entire player's gambling history shall be accessible to the player upon request.			
16.3.c) The player support function concerning responsible gaming via online forms or personal contact, including but not limited to, live chat or telephone; and	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
16.3.d) Helplines or means to contact organisations providing information and assistance in respect of gambling disorders. Note: Provided that B2C licensees offering their gaming service by remote means other than online shall ensure that the players may avail themselves of the above information at any time, including by informing players upon registration that they can refer them to an organisation which aids persons who have gambling disorders, should the players feel such need.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
16.4) Full screen games shall not be offered to players unless a real time clock is displayed on the screen at all times and players are given the facility to exit the game.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.

L.N. 176/2004	Results		
	OK	Fail	Observations
Part VII - Registration of players			
Application for registration of players			
32.1 A licensee shall not permit a person to participate as a player in an authorised game conducted by the licensee unless that person is registered as a player and holds an account with the licensee.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
32.2.a The licensee may register a person as a player only if the licensee has received from that person an application for registration	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
32.2.b The application shall at least include the following details:			
(i) that the player is over eighteen years of age	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
(ii) the player's identity	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
(iii) the player's place of residence	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
(iv) the player's valid e-mail address	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
32.2 Provided that if a licensee becomes aware that a person has provided false information in this respect, the licensee shall not register such person and where that person has already been registered, the licensee shall immediately cancel that person's registration as a player with the	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.

L.N. 176/2004	Results		
	OK	Fail	Observations
licensee.			
32.3 No person under eighteen years of age may be registered as a player and any funds deposited or any money won by any such persons shall be forfeited to the Authority32.4	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
32.4 The licensee shall, at all times, keep a secure online list of all registered players.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
32.5 Any one player can only register a single account with the licensee.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.

Part VIII - Player's Accounts and Payment of Winnings			
Players' account to be kept			
35.1 The licensee shall establish and maintain a player's account in relation to each player who is registered with the licensee.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
35.2.a The licensee must credit to the account established under sub-regulation (1) in respect of a registered player all funds a) Received by the licensee from or on behalf of the player, or	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
b) owned by the licensee to the player.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
35.3.a The licensee shall not accept a wager from a player unless: (a) a player's account has been established in the name of the player and there are	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.

L.N. 176/2004	Results		
	OK	Fail	Observations
adequate funds in the account to cover the amount of the wager, or			
(b) the funds necessary to cover the amount of the wager are provided in an approved way.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
35.4 The licensee shall not accept cash from a player and funds may be received from the player only by any of the following methods: -credit cards -debit cards -electronic transfer -wire transfer -cheques -any other method approved by the authority	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
35.5 A licensee shall not provide credit to a player or a player's account or act as agent for a credit provider to facilitate the provision of credit to a player or a player's account	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
Payment to players			
36.1 A licensee shall not make a payment in excess of two thousand and three hundred and twenty-nine euro and thirty-seven cents (€2,329.37) out of a player's account to a player until the player's identity, age and place of residence have been verified	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
Part IX - Financial Protection of Players			
Problem gaming warning			
42 A licensee shall display at all times, in a	<input type="checkbox"/>	<input type="checkbox"/>	N/A

L.N. 176/2004	Results		
	OK	Fail	Observations
prominent place, on the entry screen of the website, a warning of the addiction possibilities of gaming and information and links to other websites assisting compulsive gamblers.			Out of testing scope only testing the game functionality.
Limits set by Player			
43.1 A registered player may by written notice or electronic notice to the licensee:			
(a) set a limit on the amount the player may wager within a specified period of time(b) set a limit on the losses the player may incur within a specified period of time	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
(b) set a limit on the losses the player may incur within a specified period of time	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
(c) set a limit on the amount of time the player may play in any one session	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
d) exclude the player from playing for a definite or indefinite period of time.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
43.2 A player who has set a limit or exclusion under this regulation may change or revoke the limit or exclusion by written notice or electronic notice given to the licensee.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
43.3 A notice increasing or revoking a limit or decreasing the exclusion has effect only after seven days after the licensee has received the notice.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
43.4 A notice reducing a limit or increasing the exclusion has effect immediately after it is received by the licensee	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.

L.N. 176/2004	Results		
	OK	Fail	Observations
43.5 A licensee shall not accept a wager from a player contrary to a limit or exclusion set by the player under this regulation.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.

Display of counters			
44.1 Where the game is displayed on a screen the licensee shall cause to be displayed on the screen, at all times during the game, a counter which automatically updates and shows the player's account balance	✓	<input type="checkbox"/>	
44.2.a) The licensee shall also make available to every player an automatic reality check at intervals of one hour	✓	<input type="checkbox"/>	
44.2.b) The automatic reality check shall:			
(i) suspend play	✓	<input type="checkbox"/>	
(ii) clearly indicate for how long the player has been playing	✓	<input type="checkbox"/>	
(iii) display the player's winnings and losses during such period of time	<input type="checkbox"/>	<input type="checkbox"/>	N/A Operator requirements
(iv) require the player to confirm that the player has read the message	<input type="checkbox"/>	<input type="checkbox"/>	N/A Operator requirements
(v) give an option to the player to end the session or return to the game.	✓	<input type="checkbox"/>	
Indication of currency			
45) All amounts displayed relating to wagers and winnings shall be quoted with the symbol of currency that the player is playing with.	✓	<input type="checkbox"/>	

Player Protection Directive n. 2/2018	Results		
	OK	Fail	Observations
Part VII			
Return to Player			
22) A B2C licensee offering games online which use repetitively generated random selection for determining winning combinations to players, in accordance with the way in which the games offered thereby are designed, shall pay out on average a prize amounting to ninety-two per centum (92%) or more of the money or money's worth wagered, or any such higher percentage as may be stipulated through a condition of the licence.	✓	<input type="checkbox"/>	
22.2) A B2C licensee shall ensure that its systems monitor the average percentage returned to the players as prizes for these games. Provided that B2C licensees whose games are hosted and managed by an approved B2B licensee, may have this obligation fulfilled by the said B2B licensee.	✓	<input type="checkbox"/>	

L.N. 176/2004 – Part X	Results		
	OK	Fail	Observations
Aborted and Miscarried Games			
Procedure to be followed when game aborts			
47.1) A licensee shall take all reasonable steps to ensure that the licensee's approved computer system enables a player whose participation in a game is, after he or she has made a wager, interrupted by a failure of the telecommunications system or a failure of the player's computer system that prevents the player from continuing the	✓	<input type="checkbox"/>	

L.N. 176/2004 – Part X	Results		
	OK	Fail	Observations
game, to resume, on the restoration of the system, his or her participation in the game that was interrupted as at the time immediately before the interruption.			
47.2) If a licensee's computer does not enable a player to continue, after the restoration of the system, with a game interrupted by a failure of the telecommunications system or the player's computer system, the licensee shall			N/A - This requirement is out scope for this evaluation. B2B evaluation only.
(a) ensure that the game is terminated;	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
(b) refund the amount of the wager to the player by placing it in the player's account.	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
Procedure to be followed when game miscarries			
48.1) If a game is started but miscarries because of a failure of the licensee's computer operating system, the licensee shall:	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
48.1.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	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
48.1.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	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
Third Schedule - Regulation 25			

L.N. 176/2004 – Part X	Results		
	OK	Fail	Observations
Technical Requirement for Gaming System			
1) The gaming system must:			
(a) faithfully follow the game rules published by the operator and	✓	<input type="checkbox"/>	
(b) provide over time no more than the expected house advantage to the operator.	<input type="checkbox"/>	<input type="checkbox"/>	N/A - This requirement is out scope for this evaluation. B2B evaluation only.
2) Both the gaming and financial transactions must be congruent and secure.	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
3) The gaming system must satisfy the following criteria for randomness, following Schneier:			N/A RNG was out of scope.
(a) the data must be randomly generated, passing appropriate statistical tests of randomness	<input type="checkbox"/>	<input type="checkbox"/>	N/A RNG was out of scope.
(b) the data must be unpredictable, i.e. it must be computationally infeasible to predict what the next number will be, given complete knowledge of the algorithm or hardware generating the sequence, and all previously generated numbers	<input type="checkbox"/>	<input type="checkbox"/>	N/A RNG was out of scope.
(c) the series cannot be reliably reproduced, i.e. if the sequence generator is activated again with the same input (as exactly as is reasonably possible) it will produce two completely unrelated random sequences.	<input type="checkbox"/>	<input type="checkbox"/>	N/A RNG was out of scope.
4) The outcome of any game event, and the return to the player, must be independent of the CPU, memory, disk or other components used in the playing device used by	<input type="checkbox"/>	<input type="checkbox"/>	N/A RNG was out of scope.

L.N. 176/2004 – Part X	Results		
	OK	Fail	Observations
the player			
5) The game or any game event outcome must not be affected by the effective bandwidth, link utilization, bit error rate or other characteristic of the communication channel between the gaming system and the playing device used by the player.	<input type="checkbox"/>	<input type="checkbox"/>	N/A RNG was out of scope.
6) The gaming system must be able to display for each game the following information on the current page or on a page directly accessible from the current page via a hyperlink:			
(a) the name of the game	✓	<input type="checkbox"/>	
(b) restrictions on play	<input type="checkbox"/>	<input type="checkbox"/>	N/A Out of testing scope only testing the game functionality.
(c) instructions on how to play, including a pay-table for all prizes and special features	✓	<input type="checkbox"/>	
(d) the player's current account balance	✓	<input type="checkbox"/>	
(e) unit and total bets permitted	✓	<input type="checkbox"/>	
(f) the rules of the game.	✓	<input type="checkbox"/>	
(g) information relating to the average winnings paid out to players of the game over a period of time or a particular number of plays.	✓	<input type="checkbox"/>	

4. ADDITIONAL INFORMATION/OBSERVATIONS

MODIFICATION 01:

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

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

New technical standards are expected to be published in 2019. In the meantime, MGA confirmed that the previous standards are still valid and have to be integrated with the 2018 directives.

The requirements laid down in the following provisions of the Directive 2/2018 shall be implemented by licensees by not later than the 31st of March 2019: Article 6(3), Article 11(2), Article 16(2), Article 16(3), Article 17(1), Article 30(1)(b). Provided that, each licensee shall notify the Authority of the intended time frame and method for implementation at the earliest and not later than the 30th of September 2018. In relation to the obligations envisaged in Article 6(2), licensees shall ensure that in the case of a gaming service offered by remote means, the terms and conditions shall be no more than one click away from the homepage of the B2C licensee, or from the game or activity to which they refer by not later than the 31st of March 2019. Licensees shall comply with the obligations envisaged in Articles 6(6) and 6(7) at the earliest and in no case later than the 30th of September 2018.

5. CONCLUSION

According to the test results^{1,2}, BMM Spain Testlabs s.l.u. confirms that the item tested is compliant with all the relevant Malta Technical Requirements described in the "Scope" section.

Yours sincerely,



BMM SPAIN TESTLABS S.L.U.

Francesco Bianchi
Director of iGaming Operations EURSAM



BMM SPAIN TESTLABS S.L.U.

Mario Zilevski
Director of Technical Services - Europe

¹ The results included in this document refer exclusively to the sample tested, as described in the corresponding section.

² BMM Spain Testlabs s.l.u. will not be held responsible for the results extracted from third party test reports, which are referred to in this document.