

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

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BMM Testlabs South Africa (Pty) Ltd

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bmm testlabs south africa (pty) ltd

no. 10 brands hatch close, kyalami business park, kyalami, 1685, south africa t +27 11 466 9419 f +27 11 466 9417

company registration: 2004/028438/07

bmm.com

GENERAL INFORMATION

Client name & Address:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Client Reference Number:	Submission request letter dated 18 November 2019
Testing dates:	Start date: 19/11/2019 End date: 17/12/2019
Product / Game Description:	Eyecon Gaming Products (2 Online Games)
Jurisdictions Recommended:	United Kingdom
Technical Standard used for Evaluation:	Remote Gambling and software technical standards, June 2017
Location where test was performed:	BMM Testlabs South Africa (Pty) Ltd No. 10 Brands Hatch Close, Kyalami Business Park Kyalami, Midrand 1685 South Africa
Location where report was issued:	BMM Testlabs South Africa (Pty) Ltd No. 10 Brands Hatch Close, Kyalami Business Park Kyalami, Midrand 1685 South Africa
Conclusion:	Pass
BMM Reference Number:	EYECON.1009
Method/Procedures used:	EURAF-SPA-MO-04 V4.5
Consultant(s):	Zwane NJ

1. SCOPE OF EVALUATION

Eyecon Alderney Limited requested BMM Testlabs South Africa (Pty) Ltd., hereinafter referred to as BMM, to evaluate the online Eyecon Gaming Products (2 Online Games) for operation in the United Kingdom Remote Gambling Market.

Testing Scope	Evaluated
Third party evaluation only	<input checked="" type="checkbox"/>
Full evaluation	<input checked="" type="checkbox"/>

2. PRODUCT CHARACTERISTICS (PRODUCT UNDER TEST)

2.1. Game software

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

The below channels were evaluated:

- DH- Desktop Game
- MH- Mobile Game

2.2. Mathematical Evaluation

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%	

2.3. Evaluated Software

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-3.1.4-config.jar	2D07411C678D6822FF4B25194B4B04E2EB31A3B0
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

3. BMM EVALUATION PERFORMED

BMM has tested and confirmed compliance of the Eyecon Gaming Products (2 Online Games) against the appropriate applicable technical requirements for the United Kingdom Remote Gambling market. BMM performed the following tests to confirm compliance to the relevant regulatory specifications:

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
RTS Requirement 2A				
The remote gambling system must make available clear information about the amount of money being gambled by the customer, including any conversions from one form of currency to another, or from currency to credits, chips or other tokens etc., at the point of conversion.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 2B				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 2C				
The gambling system must enable customers to choose whether to automatically accept price fluctuations (in either direction) that occur after their bet is requested.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing slot game functionality. The game does not have this kind of choice for players.
RTS Requirement 2D				
Customer who choose to use third party user interfaces must be informed that applications may not display full information about their gambles.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing slot game functionality.
RTS Requirement 3A				
An explanation of the applicable rules must be easily available to the customer before they 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 3C				

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
For each virtual event, game (including bingo), or lottery, information that may reasonably be expected to enable the customer to make an informed decision about his or her chances of winning must be easily available before the customer commits to gamble. Information must include: i. a description of the way the game works and the way in which winners are determined and prizes allocated ii. house edge (or margin) iii. the return to player (RTP) percentage iv. the probability (likelihood) of winning events occurring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Only point (i) and (ii) are applicable for the test of scope. Other two are not applicable due to the game type.
RTS Requirement 3D				
For each virtual event, game (including bingo), or lottery, content describing the potential prizes and payouts or the means by which these are calculated or determined must be easily available before the customer commits to gamble.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 6A				
Play for-free games must implement the same game rule as the corresponding play-for-money games offered on the same facilities (ie the same website). Operators must take all reasonable steps to ensure that play-for-free games accurately represent the likelihood of winning and prize the distribution in the play-for-money game. For the purpose of this requirements playing a game includes participating in a lottery and /or betting on a virtual event.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing game functionality. Play for free game was not part of scope.
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, though, for example, statistical analysis using generally accepted tests and methods of analysis. Adaptive behaviour (i.e. a compensated game) is not permitted	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	RNG is not part of scope.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
RTS Requirement 7C				
Game designs or features that may reasonably be expected to mislead the customer about the likelihood of particular results occurring are not permitted, including substituting losing events with near-miss losing events and simulations of real devices that do not simulate the real probabilities of the device.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 7D				
The rules, payouts and outcomes probabilities of a virtual event or game may not be changed while it is available for gambling, except as provided for in the rules of the game, lottery or virtual event. Such changes must be brought to customer's attention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 7E				
Except in the case of subscription lotteries, the system clearly and accurately display the result of the game or event and the customer's gamble. The result must be displayed for a length of time that may reasonably be expected to be sufficient for the customer to understand the result of the game or event in the context of their gamble.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS Requirement 8A				
The gambling system must provide easily accessible facilities that:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a. Make available the following three controls, each of which stops auto-play functionality when it is triggered- <ul style="list-style-type: none"> i. 'loss limit', i.e. where the player selects an option to not lose more than X from their starting balance, where X is an amount that can be selected by the player. A 'loss' in this context equates to accumulated auto-play bets minus accumulated auto-play wins. ii. 'single win limit' i.e. single win greater than Y where Y is an amount that can be selected by the player and iii. 'jackpot win' (where applicable). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Require auto-play to be implemented in such a way that each time a customer chooses to use auto-play they must select the stake, the number of auto-play gambles and at least the first of the above three controls.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The number of auto-play gambles must not exceed 100 in one batch. During auto-play the customer must be able to	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
stop the auto-play regardless of how many auto-play gambles they initially chose or how many remain.				
RTS requirement 9A				
An explanation of the jackpot rules must be clearly available to the customer before they commit to gamble.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS requirement 9B				
Jackpot systems must be configured and operated with adequate fairness and security.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope the jackpots were evaluated before.
RTS requirement 10A				
Operators must take all reasonable steps to ensure that their policies for instigating or dealing with service interruptions are fair and do not systematically disadvantage customers.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the game functionality.
RTS requirement 10B				
Systems must be capable of recovering from failures that cause interruptions to gambling, including where appropriate, the capability to void gambles (with or without manual intervention), the capability to suspend betting markets, and taking all reasonable steps to retain sufficient information to be able to restore events to their pre-failure state.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS requirement 10C				
Operators must make available information about their policies regarding service interruptions in various different circumstances.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS requirement 13A				
Where the gambling system uses full screen client applications that obscure the clock on the customer's device the client application itself must display the time of day or the elapsed time since the application was started, wherever practicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	"The time is displayed on desktop operating systems", by default the window is a small applet and does not obscure the clock in OS taskbar
RTS requirement 13B				

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
The gambling system must provide easily accessible facilities that make it possible for customers to set a frequency at which they will receive and see on the screen a reality check within a gaming session. A 'reality check' means a display of the time elapsed since the session began. The customer must acknowledge the reality check for it to be removed from the screen.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS requirement 14A				
Gambling products must not actively encourage customers to chase their losses, increase their stake or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they wish to stop	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing game functionality.
RTS requirement 15A				
Information must be made available that explains that 'live' TV or other broadcasts are delayed and that others may have more up-to-date information. Main in-play betting pages must include this information where practicable.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, not testing a live betting.
RTS requirement 16A				
Where peer-to-peer customers may be gambling against programs deployed by other customers to play on their behalf, or customers assisted by third party software, information should be made available that describes that this is possible, and if it is against the operator's terms and conditions, how to report suspected use.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, not testing a Peer to Peer game.
RTS requirement 16B				
Operators must make it clear to players whether the use of third party software is permitted and if so which types. Operators that prohibit certain types of third party software must implement measures intended to deter, prevent, and detect their use.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing game functionality.
RTS requirement 16C				
Where operators use programs to participate in gambling on their behalf in peer-to-peer gambling, easily accessible information must be displayed, which clearly informs customers that the operator uses this kind of software.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, not testing a Peer to Peer game.
RTS Requirement 17A				

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
Live dealer operations must be fair and independently auditable.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing slot game functionality.

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
RTS requirement 7A				
Random number generation and game results must be "acceptably random". Acceptably random here means that it is possible to demonstrate to a high degree of confidence that the output of the RNG. Game, lottery and virtual event outcomes are random through, for example, statistical analysis using generally accepted tests and methods of analysis. Adaptive behaviour (i.e. a compensated game) is not permitted.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	RNG is not part of scope.

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
RTS requirement 1A				
Where customers hold a credit or debit balance, the pages or screens used for gambling to move money into and out of accounts must display the customer's current account balance, either in the currency of their account (eg dollars, euros or pounds sterling), whenever that customer is logged in. Where it is not practical to display current balance from gambling screens then easily accessible links to this information must be provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 1B				
Customers must have easy access to at least three months account and gambling history without having to contact the licensee. A minimum of 12 months of gambling and account history must be made available on request. The ability to request this information should be made clear to customers and be provided as soon as is practicable.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 1C				
Customers must be able to access information about their net deposits.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 2A				

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS requirement 2B				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
RTS requirement 2C				
The gambling system must enable customers to choose whether to automatically accept price fluctuations (in either direction) that occur after their bet is requested.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 2D				
Customer who choose to use third party user interfaces must be informed that applications may not display full information about their gambles.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 4A				
Where speed of interaction has a significant effect on the customer's chance of winning, operators must assess the level of risk and demonstrate to the Commission that they are taking reasonable steps to reduce the risk to customers.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 4B				
For time-critical events, the customer should be informed that they might be at a disadvantage because of technical issues such as slower network speeds, or slower end user device performance.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing game functionality.
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 customers 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 11A				

Remote Gambling and software technical standards, June 2017.	PASS	FAIL	N/A	Observations / Comments
Measures intended to deter, prevent, and detect collusion and cheating must be implemented. Gambling systems must retain a record of relevant activities to facilitate investigation and be capable of suspending or disabling player accounts or player sessions. Operators must monitor the effectiveness of their policies and procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 11B				
Information must be made available about the operator's policies and procedures with regard to cheating, recovered player funds and about how to complain if a customer suspects other participants are cheating.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 12A				
The gambling system must provide easily accessible facilities that make it possible for customers to impose their own financial limits. Customers must be given the opportunity to set a limit as part of the registration process (or at the point at which the customer makes the first deposit or payment). For lotteries, where the customer's spend is controlled through subscriptions, additional facilities do not have to be provided.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.
RTS requirement 12B				
All reasonable steps must be taken to ensure that customer-led limits are only increased at the customer's request, only after a cooling-off period of 24 hours has elapsed and only once the customer has taken positive action at the end of the cooling off period to confirm their request.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Out of testing scope, only testing the slot game functionality.

4. ADDITIONAL INFORMATION/OBSERVATIONS

- 4.1. The signatures listed under section 2.3 of this test report were generated using the BMM Signatures tool V2.0.4. Where requested, BMM will supply the regulator/operator with this signature verification tool. A user manual will be also supplied.
- 4.2. StellaV platform version 1.7.11 was used during this evaluation.
- 4.3. The Random Number Generator (RNG) version 1.0.1 was used during the game evaluation. Refer to Enex TestLab evaluation test report: EYE-RNG_20160025 for the details of the random number generator.

**The applicant is responsible to annul, eliminate, and/or to replace the previous evaluation report with this current evaluation report, and to communicate to the relevant parties.*

5. CONCLUSION

BMM Testlabs South Africa (Pty) Ltd., has conducted a level of testing which has historically been adequate for a submission of this type. However, inherent in testing in a laboratory environment is the unavoidable limitations of it not being possible to verify the effects of all possible configurations and environments that occur in actual gaming venues. Accordingly, subject to the above comment, from the testing performed BMM Testlabs South Africa (Pty) Ltd. confirms that the item under test (unless otherwise stated) conforms to the relevant technical requirements.

Disclaimer: BMM allows its clients to review the draft BMM Evaluation Report for content. If BMM receives no queries within 30 days from date of issue as stated on page 1 of the BMM Evaluation Report, BMM Testlabs South Africa (Pty) Ltd., will take the report as correct and accepted.

The results relate only to the items tested.

This report shall not be reproduced except in full without approval of the laboratory.

Yours sincerely,

Letsoalo PD

Phutiane Letsoalo
Senior Systems Consultant

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

-End of Report-