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RvA Registration Number of Accreditation applicable to this Report:	
Inspection	I111

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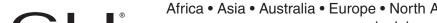|	
Report Type:	Inspection
Report Date:	18 September 2024
Inspection Body:	GLI Europe B.V. Diakenhuisweg 29-35 2033AP, Haarlem, The Netherlands RvA I111
Evaluating Laboratory:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Report Recipient:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Jurisdiction:	Netherlands Remote
Technical Standard(s) for Inspection:	Remote Gambling Assessment Scheme (Remote gambling conformity assessment scheme) Version 2.0
Supplementary Documentation:	RGD: Decree of 26 January 2021 laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Decree). RGR: Regulation of the Minister for Legal Protection of 21 January 2021, no.3181155, laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Regulation).
Software Supplier:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Submitting Party/ Licensee Name:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Product Inspected:	**Fluffy Arcade: Doubleup Ducks LuckyTap,** as described in the Software Product Details section.
Request Date:	As requested per submitter's request received on 9 September 2024.
Evaluation Period:	09 Septmeber 2024 / 12 September 2024
Internal Reference:	EE-609-EYL-24-05
Inspection Result:	Subject to the Conditions of Evaluation section of this Report and to the applicable Inspected Items listed in the Jurisdictional requirements section of this Report: **Complies**

Software Product Details

GLI inspected the following game:

Game Type	Game Name	Version
Slot Game	**Fluffy Arcade: Doubleup Ducks LuckyTap**	5.16.1

The game is inspected in an environment containing the following components:

Client-Side Details	
Delivery Mechanism:	Web-Based / Mobile
Delivery Mechanism Type:	HTML5
Evaluation Details	
Platform(s) and Version(s) Evaluated With:	3.17.0
Browsers and Versions Evaluated With:	Testing on the game is performed by iTech Labs. See ITL2402418
Flash Versions Evaluated With:	Testing on the game is performed by iTech Labs. See ITL2402418
Operating System(s) with Version:	Testing on the game is performed by iTech Labs. See ITL2402418
Mobile Device(s):	Testing on the game is performed by iTech Labs. See ITL2402418
Tablet Device(s):	Testing on the game is performed by iTech Labs. See ITL2402418

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Software Product Details

For version-control of the files, GLI gathered the following checksums:

File Name	SHA-1 Checksum
Fluffy Arcade: Doubleup Ducks LuckyTap (93 WEB)	
carbine-game-engine-5.16.1.jar	C22EC0A25565D517D2F9D9094E78988885073DD5
carbine-slots_doubleupDucksLuckyTap_93_standard-1.0.0-config.jar	ED511BD946C6E89419D8C89764EE27759DE8D2D7
carbine-slots_doubleupDucksLuckyTap_93_standard-1.0.0.json	1F2F71B47E2307C7F7DD3036BD71BB28C72ED096
CarbineGame.class	DA33D123332DE7A3DA26909F5C8D04CBEEB6086E
CarbineGameComponent.class	CDEAF4F09BB87FBCD8E9B3411EDCE29714D04540
EvaluationChain.class	BC534352CC4BDB9C12FFBE493B67ABF308CEED18
LuckyTap.class	6168D294218B3627F92F8B5AB1BD669EEC7135B8
LuckyTapAudit.class	C11D0E100B76855BC3506ECEE7AA733B78D9CD10
LuckyTapRulesImpl.class	99F030AECA7E0D26CAEB9802F90C1D0CDAC0EC1C
LuckyTapState.class	77966912B145422F884DC8F470A2C0C3E215C1F9
PaytableValue.class	D648D77E21E9472A2973C9F4B484A3FA11F2AE19
RngSequences.class	EAD214C3DD4974C3C5B9B6A975ECA7323D9524E4

Game Inspection

Descriptions of the submitted game is given below.

"Fluffy Arcade: Doubleup Ducks LuckyTap"

"Fluffy Arcade: Doubleup Ducks LuckyTap" is a game that randomly award prizes from 3 to 14 with random multipliers for duck target without multiplier feature and elephant target with multiplier feature.

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Game Inspection

GLI's Game Inspection of the game included (but was not necessarily limited to) the following elements to the extent necessary to evaluate the game for compliance with the requirements in the standards listed on the first page:

- Evaluation of provided documentation (Test report and test results generated by iTech Labs), and
- Assessment of requirements from the Assessment Scheme based on the provided evidences.

GLI has not performed an independent calculation of the theoretical Percentage Return to Player (RTP%) values of the game.
The results are shown in the table below are based on the Test report and test results generated by iTech Labs:

Game Name	Supplier's Paytable ID	In Game %RTP	Supplier's Submitted %RTP	Test lab evaluated Game %RTP
Fluffy Arcade: Doubleup Ducks LuckyTap	93%	93.117%	93.117%	93.06%

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Jurisdictional Requirements

Documentation used for the Inspection

Document Nº	Document Title	Version/Date of Issue
1	ITL2402418_Eyecon_FluffyArcadeDoubleupDucksLuckyTap_NL_09Sep24	9 September 2024
2	FluffyArcadeDoubleupDucksLuckyTap_Artwork_Games_Rules_Mobile_NL_93.117%_02Sep24 FluffyArcadeDoubleupDucksLuckyTap_Artwork_Games_Rules_PC_NL_93.117%_02Sep24 FluffyArcadeDoubleupDucksLuckyTap_Artwork_Game_Rules_Mobile_UKGC_93.117%_02Sep24 FluffyArcadeDoubleupDucksLuckyTap_Artwork_Game_Rules_PC_UKGC_93.117%_02Sep24	2 September 2024
3	RN-246-EYL-24-01-609	17 July 2024
4	Eyecon_2400006_FluffyArcadeDoubleupDucksLuckyTap_FinalMathReport_93	N/A

The documents included in this table have been used during the assessment described herein and their references are noted in the 'Documentation' column of the the Inspected Items table below.

Jurisdictional Requirements

Inspected Items

Gambling Technology		Determination	Result/Explanation	Documentation
54 R3.11 **ID NL:** KS.09.01 _2.0	In terms of design, confirm that the licensee identifies, analyses and evaluates potential integrity risks and always includes the following issues in its considerations:			
	a. the relevant characteristics of players;	**N/A**	Online game assessment only. Operators responsibility	
	b. the payment transactions and the payment instruments authorised by the licensee and used by players;	**N/A**	Online game assessment only. Operators responsibility	
	c. the geographic location of players;	**N/A**	Online game assessment only. Operators responsibility	
	d. the behaviour of players, including at least their gambling behaviour.	**N/A**	Online game assessment only. Operators responsibility	
	Explanatory note The geographic location from which players sign in may pose an integrity risk. Such risks may include players who log into their Dutch gambling account from abroad, in particular if this takes place from countries that are subject to sanctions. Another example of an integrity risk is if attempts are made to log in simultaneously or in short succession from various locations or attempts to log into the same gambling account, particularly if there are large physical distances between these locations. This may be a sign that someone is attempting to log in under a different name or that an attempt is being made to gain unauthorised access to a gambling account. Where the likelihood of collusion, as referred to in the foregoing, is greater, if players are registered at the same address, this will also be the case if multiple players are placing bets or gambling in the same game of chance from the same location.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
55 R3.2.2 **ID NL:** KS.09.02 _2.0	In terms of design, implementation and operation, establish that the licence holder has ensured that the gaming system is configured in such a way that players will not be able to bet or gamble against themselves.	**N/A**	Online game assessment only. Operators responsibility	
	To this end, the gaming system must, inter alia, prevent multiple players from using the same device at once.	**N/A**	Online game assessment only. Operators responsibility	
	License holders are not permitted to allow players to create more than one gambling account.	**N/A**	Online game assessment only. Operators responsibility	
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

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Gambling Technology		Determination	Result/Explanation	Documentation
56 R3.4.1 **ID NL:** KS.09.03 _2.0	In terms of design, establish that the licence holder only uses names for the games on offer that match the types of game actually being played (poker, roulette, betting, etc.).	**PASS**		Ref. 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
57 R3.6 **ID NL:** KS.09.04 _2.0	In terms of design, establish that the licence holder will only award non-cash prizes to people who have actually won them and that the licence holder will not do so until it has reliably confirmed and verified the player's identity and current account as specified in the foregoing standards.	**N/A**	No Non-cash prizes advertised in game.	Ref 1, Ref 2
	Non-cash prizes must also be documented in such a way that they can be traced back to the player's person.	**N/A**	No Non-cash prizes advertised in game.	Ref 1, Ref 2
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
58 R3.7 **ID NL:** KS.09.05 _2.0	In terms of design and implementation, establish that devices cannot automatically begin taking part in betting or gambling activities without the input of the player.	**PASS**		Ref 1
	In terms of design and implementation, establish that a player will not begin participating in a game until they press a real or virtual button to confirm their stake.	**PASS**		Ref 1
	In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes.	**PASS**		Ref 1
	In terms of design and implementation, establish that the so-called auto-play functionality can only be used after the start of a game where another player is played at the same time.	**N/A**	Auto play is not available	Ref 1, Ref 2
	Explanatory notes on stakes and auto play: The stake in a game can also take the form of stakes that cannot be cashed in, such as "free spins", "bonus points", "bonus buys" or similar. The key principle in this case is that the input of a choice is the direct result of an action taken by the player. If a player does not make use of the facility made available, the gaming system can enter and record a choice – in accordance with the applicable rules of the game. In doing so, it will remain necessary for the player to place the stake themselves and, as such, auto-play for the placement of stakes is not permitted. Different types of autoplay exist. Some casino games feature a (traditional) autoplay button, which automatically places stakes for as long as sufficient gaming credit remains. The autoplay session is ended by pressing this button once more. In another variant, players are able to specify the number of consecutive games for which they wish to place automatic stakes, provided there is sufficient gaming credit. Other casino games use an indirect route, with players not indicating how much of their gaming credit they wish to use automatically and instead buying a number of "free spins" or "bonus spins". The spins are then automatically played in succession during a session that cannot be stopped early. The latter can also be referred to as "buy", "buy spins" and "buy feature". Holding down buttons on the keyboard in order to continue playing can also be regarded as a type of autoplay. Each of these cases enable a player to play consecutive games, without having to carry out any affirmative action in between in order to start the next game. Such types of autoplay are not permitted in casino games against the licensee. It may be the case that when participating in licensed gambling activities the player does not enter or cannot enter a choice to influence the course of the game, for example, if the player has taken a break. This is why casino games in which players play against each other, such as poker, have an auto-play functionality, which enters the choice required to further the course of play.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

Jurisdictional Requirements

Gambling Technology		Determination	Result/Explanation	Documentation
59 R3.9 **ID NL: KS.09.06_2.0**	In terms of design, establish that the auto-play function operates in accordance with the rules of the game, as communicated to the player. At the very least, establish that the fairness of the function and the timeliness of choices are addressed.	**N/A**	Auto play is not available	Ref 1, Ref 2
	In terms of design, establish that a player cannot simply stake money on something by using the auto-play function, unless this is necessary for the progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker).	**N/A**	Auto play is not available	Ref 1, Ref 2
	Explanatory note on auto play: The key principle in this case is that the input of a choice is the direct result of an action taken by the player. If a player does not make use of the facility made available, the gaming system can enter and record a choice – in accordance with the applicable rules of the game. In this context, it must still be necessary for the player to perform an action in order to make the bet. Auto-play for betting purposes is therefore not permitted. It may be the case that when participating in licensed gambling activities the player does not enter or cannot enter a choice to influence the course of the game, for example, if the player has taken a break. This is why casino games in which players play against each other, such as poker, have an auto-play functionality that enters the choice required to further the progress of the game.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
60 R3.9a **ID NL: KS.09.07_2.0**	In terms of design and implementation, establish that the gaming system has been set up in such a way that fair play is guaranteed at all times in live casino games, by way of the following technical requirements:			
	a. The player is able to take part in those casino games via a direct video link.	**N/A**	Not a live casino game	Ref 1
	b. The direct video link and, where applicable, other communication connections and means of communication:			
	i. have been sufficiently protected against malfunctions;	**N/A**	Not a live casino game	Ref 1
	ii. are protected against unlawful access, unauthorised use and manipulation;	**N/A**	Not a live casino game	Ref 1
	c. the progress of the live casino games and the gambling behaviour of players is analysed and recorded on the basis of video surveillance and video reporting;	**N/A**	Not a live casino game	Ref 1
	d. the analysis and recording, as referred to under c., shall in any case be aimed at identifying and countering fraud and abuse, as well as risks of gambling addition;	**N/A**	Not a live casino game	Ref 1
	e. Only personnel who have the requisite qualifications and have received training either internally or externally or have attended a training course shall be used to organise the live casino games.	**N/A**	Not a live casino game	Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

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Gambling Technology		Determination	Result/Explanation	Documentation
61 R3.3 **ID NL:** KS.09.08_2.0	In terms of design and implementation, establish that the gaming system allows the player to finish a game interrupted by malfunctions.	**PASS**		Ref 1
	In terms of design and implementation, establish that the gaming system provides information to the player about the status of a game interrupted by malfunctions.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
62 R3.5 **ID NL:** KS.09.09_2.0	In terms of design and implementation, establish that, before play commences, the gaming system provides the player with information about the possible bets and the bets selected by the player.	**PASS**		Ref 1, Ref 2
	In terms of design and implementation, establish that the player provides the value of their stake in money (a currency) before the game starts.	**PASS**		Ref 1, Ref 2
	Explanatory note: When organising remote gambling, the licence holder is free to indicate players' stakes in units other than currency, such as a representation in points or various types of chips. The licence holder shall inform the player about the use of units other than currency prior to their participation in the gambling activities. The licence holder shall also provide the player with a means by which it is clear to the player during play what amount of money they are betting or what amount of money is required as a stake. This could include a calculation tool. This makes it easier for the player to monitor their own financial or other limits, adjust their playing behaviour accordingly or even decide not to participate any longer.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
63 B4.2.3 and R3.2.1 **ID NL:** KS.09.10_2.0	In terms of design and implementation, establish that, with the exception of the actual betting and the actual payment of the prizes, the practice games are the same as the gambling activities offered by the licence holder.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
64 R3.2a.1 **ID NL:** KS.09.11_2.0	In terms of design and implementation, establish that the Random Number Generator applied is suitable for the form of gambling for which the Random Number Generator is used.	**PASS**		Ref 1
	Explanatory note: The Random Number Generator must be suitable to be used for the random parts of the gambling activities. The results of the random aspects of the gambling activities are directly related to the draw by means of a Random Number Generator.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

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Gambling Technology		Determination	Result/Explanation	Documentation
65 R3.2a.3 **ID NL:** KS.09.12_2.0	In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes the below tests: • the DIEHARD Test (Marsaglia) and; • the NIST (National Institute of Standards and Technology);	**PASS**		Ref 1
	For mechanical random number generators such as roulette kettles, it is possible to limit the dataset to a minimum of 1000 times the possible outcomes. Explanatory note: When using a physical die that has 6 possible outcomes, the minimum dataset is 6 * 1000 = 6000.	**N/A**	Not a mechanical random number generator	Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
66 R3.2.1 **ID NL:** KS.09.13_2.0	In terms of design and implementation, establish that each Random Number Generator is equipped with a suitable method of seeding and re-seeding so that predictability of results is avoided.	**PASS**		Ref 3
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
67 R3.2.1 **ID NL:** KS.09.14_2.0	In terms of design and implementation, establish that, except for the randomness of other players, the outcome of all chance parts of the gambling activities are based on the Random Number Generator. Exception: when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent. Examples: a second draw from a real or virtual pile of cards without the first card drawn being put back or a draw of virtual bingo without the first draw being replaced.	**PASS**		Ref 1, Ref 3
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
68 R3.2.1 **ID NL:** KS.09.15_2.0	In terms of design and implementation, establish that each outcome of the Random Number Generator, and the result it has led to in the gambling, is recorded.	**PASS**		Ref 1, Ref 3
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

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Gambling Technology		Determination	Result/Explanation	Documentation
69 R3.2.1 **ID NL:** KS.09.16_2.0	In terms of design and implementation, establish that the outcome of any game is determined solely by chance and the choice or choices made by the player within the framework of the game.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
70 R3.2.1 **ID NL:** KS.09.17_2.0	In terms of design and implementation, establish that the gambling can function in the same way, independently of the means used by the players.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
71 R3.2.1 **ID NL:** KS.09.18_2.0	In terms of design and implementation, establish that the odds of winning or losing expected by the player correspond to the odds generated and presented by the gambling activities.	**PASS**		Ref 1
	Explanatory note: constructions such as 'near miss', or similar constructions whereby situations of 'you almost won' are deliberately presented, are not permitted. For example, gambling activities in which a physical object is simulated (e.g. dice, roulette wheels, fruit machines) will have to provide fair results that are in line with expectations with regard to a physical object.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
72 R3.2.1 **ID NL:** KS.09.19_2.0	In terms of design and implementation, establish that, where present, the jackpot is linked to a game outcome of the gambling activities and that the jackpot is part of the prize schedule of the gambling activities.	**PASS**		Ref 1, Ref 2
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
73 R3.3 **ID NL:** KS.09.20_2.0	In terms of design and implementation, establish that the pay-out rate presented is the theoretical pay-out rate.	**PASS**		Ref 1, Ref 4
	Explanatory note: The theoretical pay-out rate must correspond to the pay-out rate. Below is an example with a bet of one euro. Examples: Option 1 = 0 euro (25% chance); Option 2 = 0 euro (25% chance); Option 3 = 1 euro (25% chance); Option 4 = 2 euro (25% chance). The theoretical pay-out rate = 75%.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

Jurisdictional Requirements

Gambling Technology		Determination	Result/Explanation	Documentation
74 R3.2.2 **ID NL:** KS.09.21_2.0	In terms of design and implementation, establish that the identity of participants in gambling is known to the licence holder.	**N/A**	Online game assessment only. Operators responsibility	
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
75 R3.2.2 **ID NL:** KS.09.22_2.0	In terms of design and implementation, establish that, in player-to-player gambling activities, the gaming system continuously analyses for collaborating or colluding players in real time.	**N/A**	Single player game only. No player interaction	Ref 1, Ref 2
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
76 R3.2.2 **ID NL:** KS.09.23_2.0	In terms of design and implementation, establish that technical facilities are in place to recognise, analyse and record suspicious circumstances.	**N/A**	Online game assessment only. Operators responsibility	
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
77 R3.2.2 **ID NL:** KS.09.24_2.0	In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game.	**N/A**	Single player game only. No player interaction	Ref 1, Ref 2
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
78 R3.3 **ID NL:** KS.09.25_2.0	In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded.	**N/A**	No mechanical RNG used	Ref 1, Ref 3
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
79 R3.8 **ID NL:** KS.09.26_2.0	In terms of design and implementation, establish that the gaming system will accept the player's bet and participation only if the outcome of the immediately preceding game is certain.	**PASS**		Ref 1
	In terms of design and implementation, establish that the gaming system gives the player sufficient opportunity to influence the further course of the game.	**PASS**		Ref 1
	Explanatory note: Acceptance of the stake and participation shall only follow if the outcome of the preceding game is known. In relation to the last single stake for that game, the outcome must be a clear win, draw or loss. The stake in a game may also have a form that cannot be cashed in, such as "free spins", "bonus points", "bonus buys" or similar. Sufficient opportunity means there must be sufficient time to absorb information and make a choice.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

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Gambling Technology		Determination	Result/Explanation	Documentation
80 B4.34 and R3.4 **ID NL:** KS.09.27_2.0	In terms of design and implementation, establish that the rules of the game and the pay-out percentage presented for the game do not change during the game.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
81 B4.34 and R3.4 **ID NL:** KS.09.28_2.0	In terms of design and implementation, establish that each game is provided with as comprehensive an explanation of the game as possible, including instructions on how to play.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
82 B4.34 and R3.4 **ID NL:** KS.09.29_2.0	In terms of design and implementation, establish that the game explanations and related instructions do not give rise to deception or misunderstanding.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
83 B4.34 and R3.4 **ID NL:** KS.09.30_2.0	In terms of design and implementation, establish that the game explanations and related instructions are displayed using the tool used by the player for the gambling.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
84 B4.34, B4.38 and R3.4 **ID NL:** KS.09.31_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions are in any case drawn up in the Dutch language.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

Jurisdictional Requirements

Gambling Technology		Determination	Result/Explanation	Documentation
85 B4.34, B4.38 and R3.4 **ID NL:** KS.09.32_2.0	In terms of design and implementation, establish that the game explanations and corresponding instructions are set to Dutch by default.	**PASS**		Ref 1
	Explanatory note: the player must be able to change their default setting after registration.			
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
86 B4.34 and R3.4 **ID NL:** KS.09.33_2.0	In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
87 B4.34 and R3.4 **ID NL:** KS.09.34_2.0	In terms of design and implementation, establish that game explanations and related instructions are available before the player places their bet.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
88 B4.34 and R3.4 **ID NL:** KS.09.36_2.0	In terms of design and implementation, establish that game explanations and corresponding instructions are also available during the game.	**PASS**		Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		
89 B4.34 and R3.4 **ID NL:** KS.09.37_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions contain information on the theoretical pay-out rate of the gambling activities.	**PASS**		Ref 1
	In terms of design and implementation, establish that, where applicable, the pay-out percentage is displayed for different game strategies of the player.	**N/A**	Not a strategy game	Ref 1
	Methods Used:	**PC-TC-001, WI-FI-009**		
	Performed by:	**GLI Europe B.V.**		

Inspection Plan

Description of the inspection plan, drawn up on the basis of the features of the game system:

GLI has performed an Inspection assessment of the requirements applicable to the submitted game. The assessment consisted of the following elements:

- Evaluation of provided documentation (Test report and test results generated by iTech Labs), and
- Assessment of requirements from the Assessment Schema based on the provided evidences.

In addition to this, GLI has confirmed the scope of accreditation and test methods used for the evaluation performed by iTech Labs.

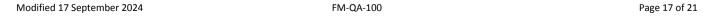## Management System

Assessment and application of the Licence holder's management system for the assessment of the risk levels of the distinct components of the game system:
Please refer to operator's change management report.

Description of the manner in which the procedures referenced in the previous paragraph are applied by the licence holder:
Please refer to operator's change management report.

Methods used in the Inspection

Explanation and justification of the methods, techniques and principles used in the inspection.

Inspection Method	Reference No	Inspection Body	Explanation
GLI Policy for Testing Checkoffs and Forms	**PC-TC-001**	GLI Europe B.V.	The purpose of this policy is to establish procedures for handling Regulatory (Jurisdictional/Conformance Criteria) Checkoffs and other evaluation-related forms included in a completed submission by GLI employees.
Inspection Assessments for Netherlands Remote	**WI-FI-009**	GLI Europe B.V.	This Work Instruction prescribes the procedure for conducting Inspection Assessments for Remote Gaming Systems, or components thereof, against the requirements detailed in the Gaming System Assessment Scheme.

The game assessed in this report was originally tested by iTech Labs under their applicable accreditation (ISO/IEC 17025 and ISO/IEC 17020) granted by NATA (Accreditation number 15690).
The tests performed by iTech Labs include (per the evaluation report for the game issued by iTech Labs):
- Game Rules & Artwork evaluation
- Functional tests
- Emulation tests
- RTP Calculations
- Source code Review
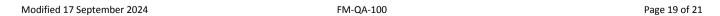- Other records

GLI has been provided with both the Evaluation report for the game and the underlying test results for the purpose of GLI's assessment, as well as the documented procedures under which the tests were performed. These have all been evaluated by GLI.

Findings

No non-conformities were found.

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Conditions of Evaluation

GLI's compliance evaluation of the game is subject to the following conditions:

GLI's compliance evaluation of the game was related only to the technical scope of work elements discussed herein. This specifically excludes any other features or functions provided by the submission not related to these elements.

GLI generated the checksums of the software and source code files using the methods stated below:

Verify+ by Kobetron™ - Verification Procedure for Files or Directories:
1. Open Verify+ by Kobetron™.
2. Select the "File" or "Directory" radio button option.
3. Select the "Browse" button and then choose the file or the top directory for which a signature is being requested.
4. Click the "Verify" button.
5. The current File/Directory being checked will be displayed in the window.
6. The program will generate the aforementioned signatures and display the results.

The game use an RNG approved in Report RN-246-EYL-24-001-609 dated 17 July 2024

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Conclusion

Subject to the Conditions of Evaluation, GLI has determined that the inspected elements comply with the requirements of the applicable Technical Standard(s) of the aforementioned jurisdiction.

If you should have any questions regarding this information, please feel free to contact our office.

Sincerely,

James Boje
Managing Director EMEA
Executive

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