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|---|---|
| **Report Type:** | Inspection |
| **Report Date:** | 17 January 2025 |
| **Inspection Body:** | GLI Europe B.V.<br>Diakenhuisweg 29-35<br>2033AP Haarlem<br>The Netherlands |
| **Report Recipient:** | Eyecon Alderney Limited<br>Inchalla, Le Val<br>Alderney<br>GY9 3UL |
| **Jurisdiction:** | Netherlands Remote |
| **Technical Standard(s) for Inspection:** | • Remote Gambling Assessment Scheme (Remote gambling conformity assessment scheme) Version 2.1 |
| **Supplementary Documentation:** | • RGD: Decree of 26 January 2021 laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Decree)<br>• 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), including amendment of 12 June 2024, no.5531723. |
| **Software Suppliers:** | Eyecon Alderney Limited<br>Inchalla, Le Val<br>Alderney<br>GY9 3UL |
| **Submitting Party/Licensee Name:** | Eyecon Alderney Limited |

Inchalla, Le Val
Alderney
GY9 3UL

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| **Products Inspected:** | Bouncy Bingo Balls |
| | as described in the Software Product Details section. |
| **File Numbers:** | MO-385-EYL-24-01 |
| **Inspection Results:** | 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:<br>**Complies** |
| **Request Date:** | 16 December 2024 |
| **Evaluation Period:** | 07-January-2025 - 10-January-2025 |
| **Evaluating Laboratories:** | • GLI Europe B.V.<br>Diakenhuisweg 29-35<br>2033 AP Haarlem<br>The Netherlands<br>RvA I111 |

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

## Software Product Details

GLI inspected the following game:

| Game Type | Game Name | Server Version | Client version |
|-----------|-----------|----------------|----------------|
| Slot Game | 1: Bouncy Bingo Balls | 5.16.1 | 5.16.1 |

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

| Client Side Details | |
|---|---|
| Delivery Mechanism(s) | Desktop Web-based, Mobile Web-based |
| Delivery Mechanism Type(s) | HTML5 |
| **Evaluation Details** | |
| Platform(s) and Version(s) Evaluated With | Eyecon (3.18.1) |
| Browser(s) and Version(s) Evaluated With | Google Chrome Desktop (131.0.6778.206) |
| Operating Systems(s) With Version | Windows Enterprise Desktop (11) |
| Mobile Device(s) | Apple iPhone XS (MTAJ2LL/A (A1920)) |

For the control of critical files, the following verification signatures have been verified:

| File Name: | CarbineGame.class |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | DA33D123332DE7A3DA26909F5C8D04CBEEB6086E |

| File Name: | CarbineGameComponent.class |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | CDEAF4F09BB87FBCD8E9B3411EDCE29714D04540 |

| File Name: | carbine-game-engine-5.16.1.jar |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | C22EC0A25565D517D2F9D9094E78988885073DD5 |

| File Name: | carbine-reactor_bouncyBingoBalls_93_standard-1.0.7.json |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | E902CAB8457307B0E4DCA3ACD3F4D15DA70ECADD |

| File Name: | carbine-reactor_bouncyBingoBalls_93_standard-1.0.7-config.jar |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | A28166D3AB485FD409CDF1B6E5B68134E029D063 |

| File Name: | CountSymbolEvaluator.class |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 576C91BE9189657F4DCD79A6DD24D666D7E8A4A5 |

| File Name: | DisplayGenerator.class |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 5969CDEC1412E8BBE902F3E9B521502E17C092BA |

| File Name: | EvaluationChain.class |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | BC534352CC4BDB9C12FFBE493B67ABF308CEED18 |

| File Name: | EyeconSpinGameRules.class |
|---|---|

| | |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | E45FA9F06D7598168B34EFFAE0A6C188BDBBCA3D |

| | |
|---|---|
| File Name: | GameWinsCalculatorImpl.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 5DBC93C0E3838A7C4DC2AD281D3AD1D68BBFD8FF |

| | |
|---|---|
| File Name: | LinesWinMultiPatternEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 725AA252D88A32712345310D8CB5C83A490A2548 |

| | |
|---|---|
| File Name: | Multiplier.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | ACC995BF8CFC1278C0770C47CDD17C56AC389ED8 |

| | |
|---|---|
| File Name: | PatternMatchingEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 7D99BC50BF94187B55CEAFC36839AA3DB80B05C5 |

| | |
|---|---|
| File Name: | PrizeLinePatternMatchingEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | D9EAE0138B55B40DC780E6DD63EF8FDA37B75FE3 |

| | |
|---|---|
| File Name: | PrizeLineTriggerEvaluator.class |
| Game Name: | Bouncy Bingo Balls |

| | |
|---|---|
| SHA-1 Checksum: | 459FCE9E3BE01F4F5A53BBB8813BD706274F2390 |

| | |
|---|---|
| File Name: | PrizeMultiplier.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 37C3EB7470125014D97A8BE6A9D942E46846516D |

| | |
|---|---|
| File Name: | RebetDetailBuilder.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 98DAB1C87BEDCAAADB9FBD78E616F00B304D276F |

| | |
|---|---|
| File Name: | RebetEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | A2FECF4BD265E72EF1680251FF7E02608CBA16C1 |

| | |
|---|---|
| File Name: | RebetsLineWinPatternMatchingEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 437967E660C176F9ABAC02E1D3DF5C51210FACF8 |

| | |
|---|---|
| File Name: | ReelStripGenerator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 2E1F466A65DA9CBA3D2D4D85639CFF560214AE70 |

| | |
|---|---|
| File Name: | ReelSymbolExpander.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 64C3A772AF93FA2AE20994F2D4A338DCFA3356A2 |

| | |
|---|---|
| File Name: | ResetRebetEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | C15AF27D44FF3C62834438AB1F6615EAA36593D6 |

| | |
|---|---|
| File Name: | RetriggerCount.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 52F246C12BA73D4BB0998167556C2A6C46D40BCE |

| | |
|---|---|
| File Name: | RngSequences.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | EAD214C3DD4974C3C5B9B6A975ECA7323D9524E4 |

| | |
|---|---|
| File Name: | SlotGameVariableConfigurationImpl.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 73B7BAF38E3904CF4464B3ADF43B85486F439369 |

| | |
|---|---|
| File Name: | SymbolHoldSpinGame.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 48CB554DD73CA2A3D3F025F5220F8B36CAEC9335 |

| | |
|---|---|
| File Name: | SymbolHoldSpinRuleImpl.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 6305BB4B5905FD0335C32A0717E865CD54325EA7 |

| | |
|---|---|
| File Name: | SymbolHoldSpinScreenEvaluator.class |

| | |
|---|---|
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 8A65FB7B419FEA0473A1A8B19EEF4A9EF7128C56 |

| | |
|---|---|
| File Name: | SymbolHoldTriggerEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | E2591BD905978126A984A943ABB710F15C5E51FC |

| | |
|---|---|
| File Name: | SymbolSwapperGame.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | B45BE7B98B5C929A927EFF7AAA7FEAD35EB51493 |

| | |
|---|---|
| File Name: | SymbolSwapSpinShapeEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 2F101CB1D95B84E4AB7FC87D38988ED2FD0022BC |

| | |
|---|---|
| File Name: | SymbolSwapSpinTriggerEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | B874F1C346CEF235FCB49E7D8D1E877A118BD104 |

| | |
|---|---|
| File Name: | TriggerRandomMultiplierEvaluator.class |
| Game Name: | Bouncy Bingo Balls |
| SHA-1 Checksum: | 49C866693BB63FD8D9A0459AE248EC5352261F92 |

## Game Inspection

A description of the submitted software is listed below.

1. **Bouncy Bingo Balls**

"Bouncy Bingo Balls" is a 5-reel, Cluster Pays online reel game. The game includes a 'Cascades' feature.

GLI's Inspection of the software included (but was not necessarily limited to) the following elements to the extent necessary to evaluate the software for compliance with the requirements in the aforementioned Technical Standards:

- Artwork and Game Rules Review
- Source Code Review
- Emulation Testing
- Jurisdictional Requirements Verification
- Functionality Testing
- Artwork and Interface Testing
- Regression Testing

GLI has not performed an independent calculation of the theoretical Percentage Return to Player (RTP%) values of the game.

The results shown in the table below are based on the Math report and test results generated by iTech Labs:

| Game Name | Supplier's Paytable ID | In Game RTP % | Supplier's Submitted %RTP | Test lab evaluate Game %RTP |
|---|---|---|---|---|
| **Bouncy Bingo Balls** | 93% | 93.348% | 93.348% | 93.345% |

## Jurisdictional Requirements

### Documentation Used for the Inspection

| Document No | Document Title | Version/Date of Issue |
|---|---|---|
| 1 | Game Interface Worksheet FM-EN-450 | 08 January 2025 |
| 2 | iGaming Emulation Test Script FM-EN-519 EmulationEvidence.zip | 08 January 2025 |
| 3 | iGaming Game Accounting and History Test FM-EN-338 AccountingVideoEvidence.zip | 08 January 2025 |
| 4 | Eyecon_2400012_BouncyBingoBalls_FinalMathReport_93 | 03 January 2025 |
| 5 | RN-246-EYL-24-01-609 | 17 July 2024 |

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 Inspected Items table below.

### Inspected Items

| Administrative Obligations Article no. (B) Decree or (R) Regulation | | Determination | Result/Explanation | Documentation |
|---|---|---|---|---|
| **1**<br><br>B4.4.1<br><br>**ID NL:**<br>KS.01.01_2.0 | Review the technical setup of the gaming system in order to confirm that the design guarantees that the records for the licensed betting and gambling activities are remotely kept strictly separated from the records of any other goods or services a service provider may provide and which do not fall under the Dutch licence. | N/A | Out of scope (only game functionality is tested). | |
| **Methods Used:** | | **PC-TC-001, WI-FI-009** | | |
| **Performed by:** | | *GLI Europe B.V.* | | |

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|---|---|---|---|---|
| **2**<br><br>B4.4.2<br><br>**ID NL:**<br>KS.01.02_2.0 | In terms of design and implementation, confirm that the records always show clearly what amounts must be withheld due to the betting and gambling winnings levy and betting and gambling winnings tax (and, where applicable, pursuant to Section 31(f) of the Betting and Gambling Act) and what amounts will be payable to a player. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

| **Payment Transactions**<br>Article no. (B) Decree or (R) Regulation | | **Determination** | **Result/Explanation** | **Documentation** |
|---|---|---|---|---|
| **3**<br><br>B4.25.1<br><br>**ID NL:**<br>KS.02.01_2.0 | In terms of design and implementation, confirm that all payment transactions between the licensee and the player are carried out exclusively through the gambling account. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **4**<br><br>B4.25.2<br><br>**ID NL:**<br>KS.02.02_2.0 | In terms of design and implementation, confirm that the licensee exclusively allows the use of payment instruments for payment transactions that: | | | |
| | a. have been issued by a credit institution registered in a Member State and which holds a licence as referred to in Article 8 of Directive 2013/36/EU or by a payment service provider registered in a Member State with a licence as referred to in Article 11 of Directive (EU) 2015/2366; | N/A | Out of scope (only game functionality is tested). | |
| | b. can be clearly traced back to the player. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, confirm that the player cannot credit his gambling account with money from a different payment account until his gambling account has first been credited, provided that the payment instrument in question was issued by a licensed credit institution or payment service provider (which is to say that | N/A | Out of scope (only game functionality is tested). | |

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|---|---|---|---|---|
| | players cannot use anonymous payment instruments). | | | |

Note: the assessment standards under points a and b in this standard also apply to the other payment account.

Explanatory note:

'The gambling account must be linked to a payment account at a bank or with a payment service provider (the current account). This follows from the definition of the gambling account in Section 1.1. The identity of the account holder will have been confirmed and verified by the relevant bank or payment service provider when that account was opened. The payment of the current account into the gambling account (Section 4.27(1)) confirms that the player is also the holder of the current account. In principle, the money to be waged when placing bets or gambling in licensed gambling activities must come from that current account, onto which the winnings that are obtained will similarly be paid so that they can be made available to the player.

Following the initial credit of the gambling account, the player may also credit the gambling account with money from another payment account. In doing so, the player may use any payment instrument accepted by the licensee, provided that it has been issued by a licensed credit institution or payment service provider and is not an anonymous payment instrument (subsection two).

The requirements under section 1a and b of the standard must be observed in relation to credit from another payment account under the second section of the standard.

The player should be able to be traced back to the accounts for which they have identified themselves with the relevant payment institution.

Explanatory note on the meaning of "clearly":

Clear traceability to a player implies more than simply being the holder of a current account. If an individual is able to make deposits from a current account, this does not mean the funds have been clearly traced back to the player. It only confirms the individual has a current account. Verifying that the name of the current account holder matches the name on the player account provides more certainty that the current account is traceable to the player. Deposits for a specific amount made with electronic money are not always preceded by identification and verification. In the event that electronic money is accepted, this must also be traceable to the player. The aim of this standard is to prevent funds belonging to a third party (not being the holder of the player account) from being deposited in the player account.

| **Methods Used:** | **PC-TC-001, WI-FI-009** |
|---|---|
| **Performed by:** | *GLI Europe B.V.* |

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|---|---|---|---|---|
| **5**<br><br>B4.27.1<br><br>**ID NL:**<br>KS.02.03_2.0 | In terms of design and implementation, confirm that, except for corrections, the licensee will only credit a player's gambling account with money that: | | | |
| | a. came from said player's current account or from a different payment account with a credit institution or payment service provider and can be clearly and unambiguously traced back to the player in question; and | N/A | Out of scope (only game functionality is tested). | |
| | b. resulted from winnings; or | N/A | Out of scope (only | |

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| | | | game functionality is tested). | |
| | c. resulted from free play credits (bonus) granted to the player in question. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **6**<br><br>B4.27.2<br><br>**ID NL:**<br>KS.02.04_2.0 | In terms of design and implementation, confirm that the licensee does not credit the player's gambling account with money if: | | | |
| | a. this should exceed one or more maximum limits set by the player pursuant to Section 4.14; | N/A | Out of scope (only game functionality is tested). | |
| | b. the possibility of placing bets or gambling has been suspended | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **7**<br><br>B4.28.2<br><br>**ID NL:**<br>KS.02.05_2.0 | Confirm that the design does not allow the licensee to enable a player to place bets or gamble if the balance (including any gambling credit) on his gambling account does not allow them to do so. Rule out the fact that players can end up with a negative balance on their gambling account. | Pass | | Ref. 1, Ref. 3 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **8**<br><br>B4.29.2<br><br>**ID NL:**<br>KS.02.06_2.0 | In terms of design and implementation, confirm that the licensee will only debit a player's gambling account in favour of the player's current account after that gambling account has been credited with money from that current account, with the payment account having to meet the relevant criteria (nonanonymous). If the player switches current (bank) accounts, the foregoing shall likewise apply (in Section 4.25 of the Order in Council). | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

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|---|---|---|---|---|
| **9**<br><br>B4.29.3-4<br><br>**ID NL:**<br>KS.02.07_2.0 | In terms of design and implementation, confirm that the licensee will only debit the gambling account in favour of the current account, unless the reliable, responsible and verifiable organisation of the licensed betting and gambling activities resists such a transaction: | | | |
| | a. at the player's own request; | N/A | Out of scope (only game functionality is tested). | |
| | b. in the event that the balance on the player's gambling account exceeds the maximum specified by the player on their profile; | N/A | Out of scope (only game functionality is tested). | |
| | c. in the event that the player's registration is terminated at their request in accordance with Section 4.17, under a. | N/A | Out of scope (only game functionality is tested). | |
| | Confirm that the aforementioned procedures are not carried out as long as a player is suspended from placing bets or gambling on the platform because the licensee has reason to believe that the player does not meet or has stopped meeting the conditions for registration. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **10**<br><br>R4.11<br><br>**ID NL:**<br>KS.02.08_2.0 | In terms of design and implementation, confirm that the licensee systematically records the following information as part of its registration process with regard to each transaction carried out to or from a gambling account: | | | |
| | a. the identity of the player whose gambling account is debited or credited; | N/A | Out of scope (only game functionality is tested). | |
| | b. the date and time of the transaction; | N/A | Out of scope (only game functionality is tested). | |
| | c. the amount debited or credited by the transaction; | N/A | Out of scope (only game functionality is tested). | |
| | d. the nature of the transaction; this must take place on the basis of clearly identifiable, unique signifiers such as deposit, payment, winnings, bonus credit and other sufficiently recognisable signifiers, such that these | N/A | Out of scope (only game functionality is tested). | |

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| | signifiers allow others to reconstruct the course of a game; | | | |
| | e. the nature of the payment instrument used for the transaction; | N/A | Out of scope (only game functionality is tested). | |
| | f. the account number or another unique signifier for the payment account that has been debited or credited by the transaction; | N/A | Out of scope (only game functionality is tested). | |
| | g. the account number or another unique signifier for the payment instrument used for the transaction. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, establish that the gaming system provides for the generation of reports of the transaction to or from a gambling account. | N/A | Out of scope (only game functionality is tested). | |
| | Confirm that the licensee records the following information in the Controledatabank for each gambling account where applicable: | | | |
| | a. any amount that is not debited in favour of the player's current account, given that the reliable, responsible and verifiable organisation of the licensed betting and gambling activities has resisted such a transaction; | N/A | Out of scope (only game functionality is tested). | |
| | b. the date and time of any request to credit the gambling account that the licensee has rejected due to the use of a payment instrument that is not compliant (with Section 4.27(1), heading and under a, of the Decree). | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **11**<br><br>B4.31.1<br><br>**ID NL:**<br>KS.02.09_2.0 | Confirm that the design ensures that the licensee provides the player with access to general information regarding the way in which and the conditions under which payment transactions with the player take place on the publicly accessible area of the betting and gambling interface and on the player interface. | N/A | Out of scope (only game functionality is tested). | |

| | Methods Used: | PC-TC-001, WI-FI-009 | | |
|---|---|---|---|---|
| | Performed by: | GLI Europe B.V. | | |
| **12**<br><br>B4.31.2<br><br>**ID NL:**<br>KS.02.10_2.0 | Confirm that the design ensures that the licensee provides the player with access to the necessary information relating to their gambling account and the changes to the gambling account on each page or screen of the player interface. | N/A | Out of scope (only game functionality is tested). | |
| | This information shall in any case include: | | | |
| | a. the current balance of the gambling account; | N/A | Out of scope (only game functionality is tested). | |
| | b. the opening balance of the gambling account at the most recent login; | N/A | Out of scope (only game functionality is tested). | |
| | c. the total stake since the most recent login; | N/A | Out of scope (only game functionality is tested). | |
| | d. the total profits and the total losses since the most recent login, and | N/A | Out of scope (only game functionality is tested). | |
| | e. an overview of all transactions on the gambling account for a period of at least the last 90 days. | N/A | Out of scope (only game functionality is tested). | |
| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | GLI Europe B.V. | | |
| **13**<br><br>B4.31.4<br><br>**ID NL:**<br>KS.02.11_2.0 | In terms of design, confirm that the licensee will, at the player's request, provide them with an overview of the transactions on the gambling account covering a period of at least the last 12 months. | N/A | Out of scope (only game functionality is tested). | |
| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | GLI Europe B.V. | | |
| **CDB**<br>Article no. (B) Decree or (R) Regulation | | **Determination** | **Result/Explanation** | **Documentation** |
| **14**<br><br>B5.3.1.,<br>B5.3.2.,<br>R4.19 | Establish that the licence holder has a comprehensive and up-to-date data mapping process that ensures that a complete and up-to-date data mapping result is available at any given time (in relation to licence applications, in | N/A | Out of scope (only game functionality is tested). | |

| ID NL: KS.03.01_2.0 | relation to changes, disruptions, etc.) and which complies with remote gambling regulations and the Ksa CDB specifications. | | | |
|---|---|---|---|---|
| | **A** To determine whether this is the case, establish that:<br>• the process is documented and that the feasibility of the process steps has been verified by an authorized independent officer of the licence holder or by an equivalent independent third party<br>• the process has been completed at least once in accordance with the process description – as part of the foregoing verification process<br>• the control measures have been validated (for example: verification of the implementation of a 'four eyes principle' when the process contains such a control measure) – as part of the foregoing verification process.<br>• the licence holder has a complete and up-to-date data mapping result (generally a matrix) as a result of this process | N/A | Out of scope (only game functionality is tested). | |
| | **B** Use one or more form of substantive testing to determine whether this is the case. This will at least include a comparison procedure. This indirect procedure involves a comparison of source data and target data by means of document review, where necessary with sampling of the source (e.g. customer records) and target database (the control database). In the assessment report, justify the choice of testing and sampling. | N/A | Out of scope (only game functionality is tested). | |
| | **C** Use one or more forms of compliance testing to determine whether this is the case. This will at least include validation of the source selection made by the | N/A | Out of scope (only game functionality is tested). | |

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| | licence holder and verification of the correct and appropriate allocation at data element level. In the assessment report, justify the choice of testing. | | | |
| | **D** If applicable, use:<br>• Assessment results that relate to the establishment and maintenance of the integrity, exclusivity and confidentiality of individual data.<br>• Assessments of the performance of employees or systems that carry out the process.<br>This applies to licence holders who have existing procedures and (independent) assessments. This will inter alia be the case in the following situations:<br>• in the event that a licence holder uses a service provider that has such assessments.<br>• in the event that the licence holder has such assessments at its disposal, for example, because this demonstrably complies with a comparable requirement to maintain a control database in another gambling jurisdiction. | N/A | Out of scope (only game functionality is tested). | |

Explanatory information:

A licence holder must be able to carry out a data mapping process on a systematic basis. The result of this process is an overview of the source data and the target data (Ksa data model) and what allocation has taken place between those two. The Ksa has described requirements and expectations of this data-mapping process in Section 3 of the CDB specifications. The outcome of this assessment should enable the Ksa (or an auditor) to verify the integrity of the CDB output it will receive in advance.

Furthermore, reporting of (unintended) non-compliances or adjustments observed during the assessment is crucial to the supervision of the operation of the CDB.

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| **Methods Used:** | PC-TC-001, WI-FI-009 | |
| **Performed by:** | *GLI Europe B.V.* | |

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| **15**<br><br>B5.3.1, B5.3.2., R4.19 | Establish that the licence holder has an established and controlled method (procedures, systems, documentation, etc.) with which it is able to ensure that the data from its betting and gambling | N/A | Out of scope (only game functionality is tested). | |

| NL ID:<br>KS.03.02_2.0 | platform is entered into the CDB completely and in a timely manner. | | | |
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| | To this end, at least establish that the licence holder has an overview of events taking place on its betting and gambling platform and the relationship thereof to all requested triggers from the Ksa reference model ('Ksa CDB data model'). | N/A | Out of scope (only game functionality is tested). | |
| | In addition, establish that this overview meets at least the following criteria:<br>- All triggers from the data model must be linked to events in the betting and gambling platform. Each trigger must also include an indication of how the event was detected in the gaming system.<br>- No triggers may be missing.<br>- Triggers that do not apply, show discrepancies or are incomplete must be designated as such, with a brief or longer explanation of why each of the triggers concerned is not applicable.<br>- All allocations must be complete (e.g. several events can be allocated to a single trigger in the Ksa reference model). | N/A | Out of scope (only game functionality is tested). | |
| | Examples as explanatory information:<br>1. player profile; daily at 0:00 CET; automated script; only from players who had actually played the day before;<br>2. wok_operator; daily at 0:00 CET; automated script. | | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **16**<br><br>B5.3.2 | Establish that the licence holder uses psuedonymisation for its CDB that complies with the remote gambling regulations and the Ksa CDB specifications. | N/A | Out of scope (only game functionality is tested). | |
| **ID NL:**<br>KS.03.03_2.0 | Establish that the pseudonymisation method for the CDB is part of the scope of periodic internal and external (security) audits. | N/A | Out of scope (only game functionality is tested). | |

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| | Explanatory note:<br>The Ksa publishes its specifications regarding the Control Database (CDB) on its website. These Ksa CDB specifications include guidelines on how to set up and use pseudonymisation. The output of the pseudonymisation, for example, may not exceed the number of available characters as set out in the Ksa data model. In addition, to specific guidelines, reference material (general features and functionalities of pseudonymisation) is included. | | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **17**<br><br>B5.3.3<br><br>**ID NL:**<br>KS.03.04_2.0 | Establish that the licence holder has set up and secured appropriate (electronic) access to the CDB. | N/A | Out of scope (only game functionality is tested). | |
| | In any case, you must establish:<br>a) that the regular access has been set up and secured as referred to in Section 5.3.3 of the Remote Gambling Decree;<br>b) that if the licence holder has chosen to apply the option of additional access (for example: a gateway proxy for use by auditors), such access does not lead to (additional) security risks;<br>c) establish that the licence holder has at least taken the following measures for access control so as to guarantee the integrity, exclusivity and confidentiality of the individual data of the CDB.<br>• Physical access control for areas where computer equipment linked to the CDB provides direct or indirect access to the CDB or parts thereof;<br>• Access control in respect of (operating) systems and administrative user tools that provide direct or indirect access to the CDB or parts thereof;<br>• Management and control of user roles and rights with regard to the CDB or parts thereof;<br>• Job profiles of (administrative or super) users should match any authorisations granted and user activities; | N/A | Out of scope (only game functionality is tested). | |

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| | • An up-to-date list of roles and rights (authorisation matrix linked to job (profiles); <br> • A 'follow up' should be scheduled at least every quarter to discuss the risks and non-compliances.. | | | |
| | Where applicable, the documentation provided by the licence holder should show that: <br> • There have been periodic checks at least four times a year on user activities, the separation of roles and rights and the procedures followed for entering and leaving employment and Changes by way of an authorisation matrix. <br> • A follow up has taken place to deal with (the manifestation of) risks following the identification of non-compliances in relation to access control. | N/A | Out of scope (only game functionality is tested). | |

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| Explanatory note: <br> In Section 5.3.3 of the Remote Gambling Decree, the regulator prescribes technical and organisational measures that will at all times safeguard electronic access to the CDB and the personal data included in it. The Ksa publishes its specifications regarding the Control Database (CDB) on its website. These Ksa CDB specifications contains guidelines on access. Information regarding access appears at several locations in the Ksa CDB specifications. | |
| **Methods Used:** | **PC-TC-001, WI-FI-009** |
| **Performed by:** | *GLI Europe B.V.* |

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| **18** <br><br> R4.20 <br><br> **ID NL:** <br> KS.03.05_2.0 | Establish that the relevant components of the CDB are located in the Netherlands. | N/A | Out of scope (only game functionality is tested). | |
| | Likewise, confirm that the licence holder in any case realises that installation without impeding the exercise of the powers of the regulators. | N/A | Out of scope (only game functionality is tested). | |

Explanatory note:
In MR4.20, the regulator sets out that a licence holder must ensure the installation of a CDB in the Netherlands. Being able to exercise powers means, among other things, that:
a) placement may not take place in a dwelling or in a location having the same effect; as if the Control Databank were placed in a dwelling; and
b) in the event of placement at a location where there are restrictions that have a limiting effect,

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| | arrangements must have been made to temporarily or permanently remove this obstruction if the Ksa wishes to exercise its powers. <br> The Ksa publishes its specifications regarding the Control Database (CDB) on its website. These specifications include instructions on which components of a CDB are in any case eligible for installation in the Netherlands. | | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **19** <br><br> R4.12 <br><br> **ID NL:** <br> KS.03.06_2.0 | Establish that the licence holder or prospective licence holder has a control plan and an exit plan. | N/A | Out of scope (only game functionality is tested). | |
| | A) Establish that both plans substantively meet the requirements and expectations as stated in the CDB specifications of the Ksa. | N/A | Out of scope (only game functionality is tested). | |
| | B) In particular, establish with regard to the control plan that: <br> • The control measures have been drawn up taking account of best practices and internationally harmonised standards, e.g. ISO27002; <br> • The management measures have been set up and are being implemented (insofar as the latter is necessary in relation to the associated risk); <br> • There is a mitigation plan for any residual and other risks; <br> • The individual management measures and risks are assigned to a responsible officer; <br> • This officer has sufficient authority to perform the required tasks under this responsibility. | N/A | Out of scope (only game functionality is tested). | |
| | C) In particular, establish that the exit plan contains the solutions for the exit scenarios. Indicate in a statement which validation method has been used, depending on the scenarios. Two examples: <br> (a) In case a third party has been contracted to take over the management of the CDB in the event of | N/A | Out of scope (only game functionality is tested). | |

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| liquidation: establish that there is a contract signed by authorised officers, validating whether the service description corresponds to the solution described in the exit plan and the intended effect thereof.<br>(b) In the case of an advance payment of 12 months: establish the presence and payment of at least one invoice. | | | |
| D) In addition, establish that:<br>• Both plans are substantively in line with the way the CDB is set up or that both are representative of an intended set-up. For example: validate the control measures against a CDB design or CDB configuration document. All components must be accounted for. Where possible, use an internal statement of the licence holder or prospective licence holder indicating applicability or allocation;<br>• Both plans are up to date: < 1 year;<br>• Both plans have been adopted (and, where possible, signed) by the most senior person with final responsibility;<br>• The person with final responsibility is authorised to do so;<br>• Both plans are managed by a responsible officer, including the establishment and implementation of a procedure to maintain the plans in an auditable manner;<br>• A procedure has been established and is being implemented whereby new versions of both plans are made available to Ksa immediately after adoption. | N/A | Out of scope (only game functionality is tested). | |
| Explanatory note: the Ksa publishes its specifications regarding the Control Database (CDB) on its website. These specifications contain expectations in respect of the control and exit plan. In summary:<br>• The control plan must contain all management measures around a CDB (including a risk overview). | | | |

| | • The exit plan deals specifically with termination of a CDB.<br>NB: an exit plan may also be a chapter, separate or otherwise, of a control plan. | | | |
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| | **Methods Used:** | PC-TC-001, WI-FI-009 | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

| **CRUKS**<br>Article no. (B) Decree or (R) Regulation | | **Determination** | **Result/Explanation** | **Documentation** |
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| | 1. In terms of design, confirm that | | | |
| | a. the licensee's gaming system will automatically consult the Netherlands Gambling Authority's Central Register every single time a player signs up, thus confirming access to the Register. | N/A | Out of scope (only game functionality is tested). | |
| | b. Confirm that this consultation involves a unique code (CRUKS code) and the playerspecific data regarding the player who seeks to sign in; | N/A | Out of scope (only game functionality is tested). | |
| | 2. The licensee only allows a player to sign in once it has been confirmed that the player's name is not included in the Register. | N/A | Out of scope (only game functionality is tested). | |
| **20**<br><br>B4.18.1-3<br><br>**ID NL:**<br>KS.04.01_2.0 | 3. In terms of design confirm that a service interruption protocol is in place, which must at the very least include the following steps: | | | |
| | a. the Board of Directors (Netherlands Gambling Authority) will be notified of the service interruption and its impact at once; | N/A | Out of scope (only game functionality is tested). | |
| | b. CRUKS will be consulted as soon as possible after the service interruption has been resolved; players signed in in the meantime will be checked after the service interruption; | N/A | Out of scope (only game functionality is tested). | |
| | c. the players whose names appear in CRUKS and who signed in during the service interruption will be signed out; | N/A | Out of scope (only game functionality is tested). | |
| | d. information will be provided on the measures taken; | N/A | Out of scope (only game functionality is tested). | |
| | e. information will be provided showing how many players were granted access to the organised betting and gambling activities during the service | N/A | Out of scope (only game functionality is tested). | |

| | | Determination | Result/Explanation | Documentation |
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| | interruption; and | | | |
| | f. information will be provided on how many players were signed out immediately following a consultation of CRUKS; | N/A | Out of scope (only game functionality is tested). | |
| | g. the gaming system will keep track of which persons signed in during the service interruption, and show which of these persons were not checked in the Register. | N/A | Out of scope (only game functionality is tested). | |
| | **Testing Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **21**<br><br>B20.3<br><br>**ID NL:**<br>KS.04.02_2.0 | In terms of design and implementation, confirm that the licensee exclusively uses the citizen service number (BSN: burgerservicenummer): | | | |
| | - to consult CRUKS upon registration of a player; | N/A | Out of scope (only game functionality is tested). | |
| | - to verify the identity of a player; | N/A | Out of scope (only game functionality is tested). | |
| | - any other use permitted on the basis of other laws and regulations. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, confirm that the BSN will be removed from the licensee's records immediately after receipt of the CRUKS code. | N/A | Out of scope (only game functionality is tested). | |
| | **Testing Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **22**<br><br>B22<br><br>**ID NL:**<br>KS.04.03_2.0 | In terms of design and implementation, confirm that certain persons at the licensee with specific levels of authorisation are able to review the results of CRUKS consultations. | N/A | Out of scope (only game functionality is tested). | |
| | **Testing Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **IT Systems Management**<br>Article no. (B) Decree or (R) Regulation | | **Determination** | **Result/Explanation** | **Documentation** |
| **23** | In terms of design and implementation, confirm that the IT systems management meets the following minimum requirements: | | | |
| B4.40,<br>R3.27.3 | - the licensee has documented procedures in place for the | N/A | Out of scope (only game functionality | |

| ID NL:<br>KS.05.01_2.0 | management of incidents and problems; | | is tested). | |
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| | - incidents are recorded, classified, analysed and resolved. These steps must be documented by the licensee; | N/A | Out of scope (only game functionality is tested). | |
| | - problems are recorded, classified, analysed and resolved. These steps must be documented by the licensee. 'Problems' are understood to include incidents that are recurring or do not have a clear cause; | N/A | Out of scope (only game functionality is tested). | |
| | - the licensee has documented procedures in place for change and release management; | N/A | Out of scope (only game functionality is tested). | |
| | - modifications made to IT systems are recorded and accompanied by a description and explanation; | N/A | Out of scope (only game functionality is tested). | |
| | - modifications are not authorised by a competent officer until after their impact has been evaluated and recorded; | N/A | Out of scope (only game functionality is tested). | |
| | - the licensee has detailed and documented procedures which outline how systems are configured and maintained; | N/A | Out of scope (only game functionality is tested). | |
| | - the licensee has detailed and documented procedures for the management of its systems' and infrastructure's availability and capacity; | N/A | Out of scope (only game functionality is tested). | |
| | - the licensee has detailed and documented procedures for the management of the IT related aspects of its financial management; | N/A | Out of scope (only game functionality is tested). | |
| | - the licensee has detailed and documented procedures for the management of internal and external service levels. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

| **Registration and sign-in procedures**<br>Article no. (B) Decree or (R) Regulation | **Determination** | **Result/Explanation** | **Documentation** |
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| **24**<br><br>B4.11<br><br>**ID NL:**<br>KS.06.01_2.0 | In terms of design and implementation, confirm that a player cannot be registered if the licensee does not have the following information: | | | |
| | - name; | N/A | Out of scope (only game functionality is tested). | |
| | - first name(s); | N/A | Out of scope (only game functionality is tested). | |
| | - date of birth; | N/A | Out of scope (only game functionality is tested). | |
| | - place of birth; | N/A | Out of scope (only game functionality is tested). | |
| | - citizen service number (BSN) (if held by the player); | N/A | Out of scope (only game functionality is tested). | |
| | - physical address; | N/A | Out of scope (only game functionality is tested). | |
| | - email address; | N/A | Out of scope (only game functionality is tested). | |
| | - phone number; | N/A | Out of scope (only game functionality is tested). | |
| | - account number or other unique signifier of the current account and the name of the holder of the current account; | N/A | Out of scope (only game functionality is tested). | |
| | - type of identity document; | N/A | Out of scope (only game functionality is tested). | |
| | - number of the identity document; | N/A | Out of scope (only game functionality is tested). | |
| | - data and place of issue of the identity document. | N/A | Out of scope (only game functionality is tested). | |
| | In term of design and implementation, confirm that the licensee for each player during the registration process: | | | |
| | - has requested a (copy of) a valid | N/A | Out of scope (only | |

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| | identity document; | | game functionality is tested). |
| | - determined whether the name of the current account corresponds to the specified name of the player; | N/A | Out of scope (only game functionality is tested). |
| | - validates the e-mail address or telephone number; | N/A | Out of scope (only game functionality is tested). |
| | - the date of birth functionality has been configured in such a way that only adults can sign up. | N/A | Out of scope (only game functionality is tested). |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **25**<br><br>B4.12<br><br>**ID NL:**<br>KS.06.02_2.0 | In terms of design, confirm that before registering new players, the licensee will consult the Register, using the player's surname, first name, date of birth, place of birth and citizen service number (if the player has one) as stated on the player's identity document. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design, confirm that a player is granted access if a consultation of the Register with the player's unique code (CRUKS code) has taken place and the consultation results in a 'nohit' (no error notification response and the player is not known to CRUKS). | N/A | Out of scope (only game functionality is tested). |
| | In terms of design, confirm that players will not be registered if a consultation of the Register results in an invalid request for information (404 and no result) or a valid request for information with the notification that the player is known to CRUKS (200 + CRUKS code + registered). | N/A | Out of scope (only game functionality is tested). |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **26**<br><br>B4.14<br><br>**ID NL:**<br>KS.06.03_2. | In terms of design and implementation, confirm that a player is required to indicate:<br>- the limits of their gambling behaviour and that these limits must pertain to: | | |
| | a. the maximum amount of time per day, week or month a player must be allowed access to the player interface; | N/A | Out of scope (only game functionality is tested). |
| | b. the maximum daily, weekly or | N/A | Out of scope (only |

| 0 | monthly amounts of money to be deposited into the player's gambling account; and | | game functionality is tested). | |
| | c. the maximum amount of money to be held in the player's gambling account. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, confirm that the player has set out the limits of their gambling behaviour during registration. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, establish that appropriate measures are in place to ensure that the above-mentioned limits cannot be exceeded. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, confirm that players are able to change these limits at all times, with a reduction of one or more maximum limits taking effect immediately and an increase of one or more maximum limits taking effect after at least one week. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **27**<br><br>B4.15<br><br>**ID NL:**<br>KS.06.04_2.0 | In terms of design and implementation, confirm that the licensee will only register a person as a player after that person has stated: | | | |
| | a. to be familiar with the information referred to in Section 4.34, Section 8 and Section 9 of the Decree on Recruitment, Advertising and Betting and Gambling Addiction Prevention; | N/A | Out of scope (only game functionality is tested). | |
| | b. to have full legal capacity; | N/A | Out of scope (only game functionality is tested). | |
| | c. to only bet and gamble on their own account; | N/A | Out of scope (only game functionality is tested). | |
| | d. that they will not use their registration to launder money or finance terrorism, violate sanctions, or commit fraud involving the licensed betting and gambling activities, or misuse the licensed betting and gambling activities; | N/A | Out of scope (only game functionality is tested). | |

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| | and | | |
| | e. will treat the identity verification instruments used in the registration procedure with due care, take all reasonable measures to prevent third parties from using them and to this end, where necessary, follow the guidelines as imposed by the licensee. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design, confirm that the licensee will not register a person as a player if it is aware or can be reasonably expected to suspect that the declaration as specified above is incorrect. | N/A | Out of scope (only game functionality is tested). |

| Explanatory note: |
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| Before a person can be registered as a player, they must provide a number of statements. In practice, this can be done fairly easily, for example, by ticking an affirmative answer to the question of whether they are willing to make that statement. |
| As a prospective player, the person involved will be expected to make these statements in accordance with the truth, thereby fulfilling the requirements regarding their own responsibility. If the licensee is aware or reasonably suspects that the statements are inaccurate, this leads to a higher risk of betting and gambling carried out by a vulnerable player or of gamblingrelated crime, and it may not register the relevant person as a player. The licensee may also suspect that the statement is inaccurate if the person concerned is someone who was previously registered as a player with the licensee and therefore has information to the detriment of that player. |
| The licensee may also rely on external indicators. If necessary, it will conduct a further investigation into the matter. If, following registration, it appears that the player has not made the selfdeclaration truthfully, the registration will be terminated (Section 4.17). |

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| **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| **Performed by:** | *GLI Europe B.V.* | |

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| **28**<br><br>B4.17,<br>B4.19,<br>B4.20,<br>R3.18<br><br>**ID NL:**<br>KS.06.05_2.0 | In terms of design and implementation, establish that the licence holder will suspend the player from placing bets or gambling on the licensed platform in the following cases: | | |
| | a) at the request of the player; | N/A | Out of scope (only game functionality is tested). |
| | b) in the case of a reasonable suspicion that the player does not or no longer meets the conditions for registration; | N/A | Out of scope (only game functionality is tested). |
| | c) in the case of a reasonable suspicion that the player may cause harm to themselves by betting or gambling to an excessive degree or because of their | N/A | Out of scope (only game functionality is tested). |

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| | gambling addiction, where the licence holder has notified the Board of Directors regarding the player in accordance with Section 31m(4) of the Act. | | | |
| | In terms of design, establish that the licence holder will suspend the player from placing bets and gambling on the licensed platform in the event that a) the licence holder has reason to suspect that the player does not or no longer meets the conditions for registration and b) the licence holder has reason to believe that the player may cause themselves or their loved ones harm by betting or gambling to an excessive degree or because of their gambling addiction, where the licence holder has notified the Board of Directors regarding the player in accordance with Section 31m(4) of the Act. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, establish that if, in the above-mentioned two cases, the licence holder has suspended a particular player from placing bets or gambling on its platform, it will investigate the grounds for that suspicion, and the player will be suspended from using the platform pending the investigation. | N/A | Out of scope (only game functionality is tested). | |

Explanatory note:
The licence holder shall suspend the player from being able to place bets and gambling on the licensed platform for up to six months in the cases referred to in Section 4.19(1)(b) and (c) of the Decree. Namely:
b. in the case of a reasonable suspicion that the player does not or no longer meets the conditions for registration;
c. in the case of a reasonable suspicion that the player may cause harm to themselves by betting or gambling to an excessive degree or because of their gambling addiction, where the licence holder has notified the Board of Directors regarding the player in accordance with Section 31m(4) of the Act.

Explanatory note:
If the licence holder has suspended a particular player from placing bets or gambling on its platform

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| | because it has reason to believe that the player does not or no longer meets the conditions for registration (Section 4.19(1)(b)), it must investigate the grounds for that suspicion. The player will be suspended from using the platform pending the investigation. If the licence holder has suspended a player from placing bets and gambling on its platform because it suspects that the player in question has a gambling problem, and if the licence holder has notified the Ksa as required by Section 4.19(1)(c) of this player's behaviour with a view to getting them involuntarily entered into the Central Exclusion Register, the player will be suspended until such time as the Ksa has entered the player in question into the Register or until such time as the licence holder has indicated that it does not see sufficient grounds to do so. | | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **29**<br><br>B4.21<br><br>**ID NL:**<br>KS.06.06_2.0 | In terms of design, confirm that if the player is suspended from placing bets and gambling on the licensed gambling platform, this will not affect the player's ability to access the information related to their gambling account. | N/A | Out of scope (only game functionality is tested). | |
| | Also confirm that the design ensures that the player's ability to transfer money from a debit account to a gambling account and, depending on the reason for the suspension, from the player's gambling account to their current account, is restricted. | N/A | Out of scope (only game functionality is tested). | |
| | Explanatory note on suspension and transfers:<br>If a player is suspended from the licensed gaming system, this should not affect the player's access to the information relating to his gambling account. The licensee must also allow the player to review their balance and the overview of previous transactions in the event of suspension. However, the player's ability to transfer money from a debit account to a gambling account and, depending on the reason for the suspension, from the player's gambling account to their current account, will be restricted pursuant to Section 4.27 and Section 4.29. | | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **30**<br><br>B4.22<br><br>**ID NL:**<br>KS.06.07_2.0 | In terms of design, confirm that the licensee will prevent the player from being able to sign in once a player's registration has been terminated. | N/A | Out of scope (only game functionality is tested). | |
| | Explanatory note:<br>Players whose registration has been terminated will no longer be able to sign in – this will remain the case in perpetuity. If the player wishes to bet and gamble with the gambling provider again, then the player must register again. | | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |

| | | Performed by: | *GLI Europe B.V.* | |
|---|---|---|---|---|
| **31**<br><br>B4.23<br><br>**ID NL:**<br>KS.06.08_2.0 | In terms of design, confirm that the licensee has implemented appropriate technical and organisational measures to prevent people from being signed in continuously and from signing in without authorisation. If the identification method used by the licensee is a combination of the player's username and password, it may be worth implementing specific measures that require players to manually enter this combination before being allowed to place bets or gamble. | N/A | Out of scope (only game functionality is tested). | |
| | | Explanatory note:<br>An appropriate measure for continuous signing in inter alia is a timeout. | | |
| | Methods Used: | **PC-TC-001, WI-FI-009** | | |
| | Performed by: | *GLI Europe B.V.* | | |
| **32**<br><br>R3.16<br><br>**ID NL:**<br>KS.06.09_2.0 | In terms of design and implementation, confirm the licensee will put in place appropriate measures if there is a reasonable suspicion of abuse of identifiers in the case of abnormalities in the usual method of signing in, and that it has a procedure in place to inform the player without delay. | N/A | Out of scope (only game functionality is tested). | |
| | | Explanatory note on appropriate measures:<br>In order to prevent fraud and cases of abuse, the licensee must be able to ensure that it only allows persons to sign in if they are registered with the licensee as a player. To this end, the licensee will make available personal identifiers, as referred to in Section 4.15(1)(e) of the Remote Gambling Decree. It cannot be ruled out that the personal identifiers – despite the measures taken by the licensee to prevent abuse – will be used by another person than the player to whom the identifiers have been granted and that other measures that serve to prevent other persons from signing in with the gambling account of the player are bypassed, for example, by using an email or phone control notification. The licensee must be aware of this, for example, in the event another computer or phone than usual is used to signed in, the player's password is changed or multiple attempts are made to sign in with an incorrect password. The licensee must take appropriate measures to mitigate such cases to prevent fraud and adverse consequences for the player and must inform the player as soon as possible. If necessary, the licensee may temporarily block the signing in process. | | |
| | Methods Used: | **PC-TC-001, WI-FI-009** | | |
| | Performed by: | *GLI Europe B.V.* | | |

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| 33<br><br>R3.17<br><br>ID NL:<br>KS.06.10_2.0 | In terms of design, implementation and operation, confirm that the licensee has put in place appropriate measures to exclude the player from placing bets and gambling on the licensed platform in the following cases:<br>a. persons as referred to in Section 4.6 of the Decree and other persons involved in the organisation of the licensed betting and gambling facilities. | N/A | Out of scope (only game functionality is tested). | |
|---|---|---|---|---|
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| 34<br><br>B4.26.1<br><br>ID NL:<br>KS.06.11_2.0 | In terms of design, confirm that the licence only allows players to create one single gambling account and does not allow gambling accounts to be created by persons who are not registered with the licensee's platform as players. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design, confirm that the gaming system is set up in such a way that gambling accounts can only be opened after the person involved has been registered as a player, and that the gambling account is closed when the player's registration is terminated. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| 35<br><br>B4.26.2<br><br>ID NL:<br>KS.06.12_2.0 | In terms of design, confirm that the licensee credits and debits players' gambling accounts without undue delay. This means that all deposits, stakes, winnings and credits granted must appear in the player's gambling account as soon as possible. | N/A | Out of scope (only game functionality is tested). | |
| | Explanatory note:<br>Section 4.26(2) of the Order in Council sets out that 'The licensee must ensure that credits and debits to players' gambling accounts are carried out as quickly as possible at all times. This means that all deposits, stakes, winnings and credits granted must appear in the player's gambling account as soon as possible. It is vital to players that the balance on their gambling account always reflects the latest state of affairs, so they are aware of what level of credit they still have. In addition, credits in relation to a payment request may not be held by the licensee for an unnecessarily long period of time, for example to grow interest. The second subsection does not prejudice the possibility, | | | |

| | where appropriate, of payment being made only once an investigation into irregularities has been completed | | | |
|---|---|---|---|---|
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **36**<br><br>B4.26.3<br><br>**ID NL:**<br>KS.06.13_2.0 | In terms of design and implementation, confirm that the licensee will only permit a single current account per player. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

| Quality Management System<br>Article no. (B) Decree or (R) Regulation | | Determination | Result/Explanation | Documentation Refer to Notes |
|---|---|---|---|---|
| | In terms of design and implementation, establish that: | | | |
| | - The licence holder has established a described quality management system that provides for the continuous improvement of products and services, ensures an addiction prevention policy is implemented and implements internal supervision. | N/A | Out of scope (only game functionality is tested). | |
| | In this context, establish that the described quality management system contains the following components: | | | |
| **37**<br><br>B4.40<br><br>**ID NL:**<br>KS.07.01_2.0 | - The licence holder has documented the characteristics of its products and services. | N/A | Out of scope (only game functionality is tested). | |
| | - The licence holder has documented all processes that may in any way affect players, as well as the expected results. | N/A | Out of scope (only game functionality is tested). | |
| | - The licence holder has procedures to structurally evaluate and, where necessary, improve processes, products, services and compliance with laws and regulations. | N/A | Out of scope (only game functionality is tested). | |
| | - The licence holder assesses its addiction prevention policy in terms of its effectiveness in combating excessive participation in or risks of addiction to gambling, or the development thereof, on at least an annual basis. | N/A | Out of scope (only game functionality is tested). | |
| | - The licence holder updates its addiction prevention policy if evaluation | N/A | Out of scope (only game functionality | |

| | of the policy, advice from addiction care, laws and regulations or scientific developments so require. | | is tested). | |
|---|---|---|---|---|
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

| **Information Security**<br>Article no. (B) Decree or (R) Regulation | | **Determination** | **Result/Explanation** | **Documentation** |
|---|---|---|---|---|
| **38**<br><br>B4.40, R3.27.1<br><br>**ID NL:**<br>KS.08.01_2.0 | In terms of design and implementation, establish that the licence holder has an information security system with a management cycle that provides for continuous improvement of information security. The management cycle is used for the identification and mitigation of risks. | N/A | Out of scope, ISS related. | |
| | Establish that the information security system includes the protection of assets, the processing of personal data and the transactions of player funds. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **39**<br><br>b4.40, R3.27.1<br><br>**ID NL:**<br>KS.08.02_2.0 | In terms of design, establish that there is an information security policy. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **40**<br><br>b4.40, R3.27.1<br><br>**ID NL:**<br>KS.08.03_2.0 | Establish that, with regard to information security, the licence holder has the following information in documents in terms of **design**: | | | |
| | - An established information security policy no older than one year; | N/A | Out of scope, ISS related. | |
| | - The scope of the information security management; | N/A | Out of scope, ISS related. | |
| | - The way in which a risk assessment is performed; | N/A | Out of scope, ISS related. | |
| | - The jobs or job profiles, competencies and responsibilities with regard to information security; | N/A | Out of scope, ISS related. | |
| | - The security measures; | N/A | Out of scope, ISS related. | |

| | - A description of the implementation and results of the management cycle. | N/A | Out of scope, ISS related. | |
|---|---|---|---|---|
| | Establish that, in terms of **implementation**, the documentation provided shows that: | | | |
| | - The risk assessment evaluation and follow-up are carried out in accordance with the pre-determined set-up; | N/A | Out of scope, ISS related. | |
| | - The activities performed correspond to the responsibilities regarding information security; | N/A | Out of scope, ISS related. | |
| | - Appropriate security measures have been applied; | N/A | Out of scope, ISS related. | |
| | - The management cycle has been implemented and the results evaluated and – where necessary – followed up. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **41**<br><br>b4.40, R3.27.1<br><br>**ID NL:** KS.08.04_2.0 | In terms of design and implementation, establish that the licence holder will carry out an annual penetration as part of the risk evaluation. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **42**<br><br>b4.40, R3.27.1<br><br>**ID NL:** KS.08.05_2.0 | In terms of design and implementation, establish that the licence holder has taken measures to ensure follow-up of security incidents. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **43**<br><br>b4.40, R3.27.1<br><br>**ID NL:** KS.08.06_2.0 | In terms of design and implementation, establish that the licence holder has taken general organisational measures to guarantee information security. | N/A | Out of scope, ISS related. | |
| | In this context, at least the following items are required:<br>- functions and responsibilities;<br>- separation of functions;<br>- mobile devices and teleworking;<br>- periodic monitoring of user activities. | N/A | Out of scope, ISS related. | |

| | Methods Used: | PC-TC-001, WI-FI-009 | | |
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| | Performed by: | GLI Europe B.V. | | |
| **44**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.07_2.0 | In terms of design and implementation, establish that the licence holder has specified measures for human resources and safety. | N/A | Out of scope, ISS related. | |
| | In this context, at least the following items are required:<br>- screening;<br>- employment conditions;<br>- Management responsibilities;<br>- awareness of and training on information security;<br>- allocation and revocation of roles, user rights and the right to use company assets;<br>- disciplinary procedures;<br>- responsibilities in connection with termination or change of employment. | N/A | Out of scope, ISS related. | |
| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | GLI Europe B.V. | | |
| **45**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.08_2.0 | In terms of design and implementation, establish that the licence holder has specified measures for the management of assets. | N/A | Out of scope, ISS related. | |
| | In this context, at least the following items are required:<br>- responsibility for assets;<br>- classification of information;<br>- the use of data carriers and other media. | N/A | Out of scope, ISS related. | |
| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | GLI Europe B.V. | | |
| **46**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.09_2.0 | In terms of design, establish that the licence holder has implemented access control measures. | N/A | Out of scope, ISS related. | |
| | The following items are required in terms of **design**:<br>- access control requirements;<br>- user access management;<br>- responsibilities of users; | N/A | Out of scope, ISS related. | |

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| | - access control for systems and applications.<br>- After deviations in the **design** of access control are established, there will be a follow-up to mitigate (the resulting manifestation of) risks. | | | |
| | In terms of **design**, documentation must show that:<br>- there are periodic checks, at least four times a year, on user activities, separation of roles and rights and the procedures followed for entry and exit and changes;<br>- after deviations in the **implementation** of access control are established, there will be a follow-up to mitigate risks or resulting risks. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **47**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.10_2.0 | In terms of design and implementation, establish that the licence holder has implemented measures for cryptography. | N/A | Out of scope, ISS related. | |
| | In this context, at least the following items are required:<br>- cryptography policy;<br>- key management. | N/A | Out of scope, ISS related. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **48**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.11_2.0 | In terms of design and implementation, establish that the licence holder has taken measures for operational security related to the gaming system. In any case, the following items are required:<br>- operational procedures and responsibilities;<br>- protection against malware;<br>- backup copies or backup files;<br>- automated reporting, recording and monitoring;<br>- enterprise software management;<br>- management of technical | N/A | Out of scope, ISS related. | |

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| | vulnerabilities;<br>- configurations for the control of information systems. | | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **49**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.12_2.0 | In terms of design and implementation, establish that the licence holder has taken measures to secure communications. In this context, at least the following items are required:<br>- network security management;<br>- information transfer. | N/A | Out of scope, ISS related. |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **50**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.13_2.0 | In terms of design and implementation, establish that the licence holder has taken measures for the acquisition, development and maintenance of systems. In this context, at least the following items are required:<br>- security requirements for information systems;<br>- security in development and support processes;<br>- test data. | N/A | Out of scope, ISS related. |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **51**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.14_2.0 | In terms of design and implementation, establish that the licence holder has its own measures for information security specifically aimed at suppliers and outsourced services. | N/A | Out of scope, ISS related. |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **52**<br><br>b4.40,<br>R3.27.1<br><br>**ID NL:**<br>KS.08.15_2. | In terms of design and implementation, establish that the licence holder carries out a risk assessment. The information security aspects of business continuity and fall-back options in case of incidents must be included. | N/A | Out of scope, ISS related. |
| | **Testing Methods Used:** | **PC-TC-001, WI-FI-009** | |

| 0 | Performed by: | *GLI Europe B.V.* | | |
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| **53**<br><br>b4.40,<br>R3.27.1 | In terms of design and implementation, establish that the licence holder has taken measures to ensure compliance with legal and contractual requirements and information security testing. | N/A | Out of scope, ISS related. | |
| **ID NL:**<br>KS.08.16_2.0 | Methods Used: | **PC-TC-001, WI-FI-009** | | |
| | Performed by: | *GLI Europe B.V.* | | |

| **Gambling Technology**<br>Article no. (B) Decree or (R) Regulation | | **Determination** | **Result/Explanation** | **Documentation** |
|---|---|---|---|---|
| | 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 | Out of scope, Game Inspection. | |
| | b. the payment transactions and the payment instruments authorised by the licensee and used by players; | N/A | Out of scope, Game Inspection. | |
| | c. the geographic location of players; | N/A | Out of scope, Game Inspection. | |
| **54**<br><br>R3.11<br><br>**ID NL:**<br>KS.09.01_2.0 | d. the behaviour of players, including at least their gambling behaviour. | N/A | Out of scope, Game Inspection. | |
| | Explanatory note<br>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.<br>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**<br><br>R3.2.2<br><br>**ID NL:**<br>KS.09.02 | 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 | Out of scope, Game Inspection. | |

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| _2.0 | To this end, the gaming system must, inter alia, prevent multiple players from using the same device at once. | N/A | No such feature. | |
| | License holders are not permitted to allow players to create more than one gambling account. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **56**<br><br>R3.4.1<br><br>**ID NL:**<br>KS.09.03<br>_2.0 | 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, Ref. 2 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **57**<br><br>R3.6<br><br>**ID NL:**<br>KS.09.04<br>_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 are distributed. | |
| | 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 are distributed. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **58**<br><br>R3.7<br><br>**ID NL:**<br>KS.09.05<br>_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, Ref. 3 |
| | 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, Ref. 3 |
| | In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes. | Pass | | Ref. 1, Ref. 3 |

| | 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 | The game has no Autoplay feature. | |

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. |

| **59**<br><br>R3.9<br><br>**ID NL:**<br>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 | The game has no Autoplay feature. | |
| | 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 | Pass | | Ref. 1, Ref. 2 |

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| | progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker). | | | |
| | 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 | This is an Instant game. | |
| | b. The direct video link and, where applicable, other communication connections and means of communication: | | | |
| | i. have been sufficiently protected against malfunctions; | N/A | This is an Instant game. | |
| | ii. are protected against unlawful access, unauthorised use and manipulation; | N/A | This is an Instant game. | |
| | 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 | This is an Instant game. | |
| | 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 | This is an Instant game. | |
| | 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 | N/A | This is an Instant game. | |

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| | casino games. | | | | |
| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | | *GLI Europe B.V.* | | |
| **61**<br><br>R3.3<br><br>**ID NL:**<br>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. 3 |
| | 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. 3 |
| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | | *GLI Europe B.V.* | | |
| **62**<br><br>R3.5<br><br>**ID NL:**<br>KS.09.09_2.1 | In terms of design and implementation, establish that the player stakes, winnings and losses are in any event* displayed as euro amounts clearly, comprehensibly and in a sufficiently distinctive manner by the gambling system. | | Pass | | Ref. 1,<br>Ref. 2 |
| | Notwithstanding the mandatory display in euro, player stakes, winnings and losses may be displayed as US dollar amounts when organizing poker, if: | | | | |
| | | - The game is organised in the form referred to in Section 2.1(1)(b) of the Remote Gambling Decree; and | N/A | This is an Instant game. | |
| | | - the game involves both players registered with the licensee and players from foreign providers; and | N/A | This is an Instant game. | |
| | | - the licensee takes appropriate measures to ensure that: | | | |
| | | | - the player is informed before the start of the game in a clear and comprehensible manner and as fully as possible about the US dollar display; | N/A | This is an Instant game. |
| | | | - the player can obtain information on the value of stakes, winnings and losses | N/A | This is an Instant game. |

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| | | in euros in a clear and understandable way during the game; | | | |
| | | - the indication and value of stakes, winnings or losses in US dollars is not changed during the game | N/A | This is an Instant game. | |

*Explanatory note:

The licensee must ensure that players' stakes and **also** the winnings or losses incurred by them are in any event expressed in euros in a clear and comprehensible manner. It is still possible to display the stakes (or winnings and losses) in the game as, for instance, spins, points, credits or tokens in addition to, but not instead of, euros. The licensee must ensure that the - equivalent - display in euros is displayed to the player in a sufficiently distinctive manner during the game of chance. The requirement applies not only to the gaming screen during participation in remote gambling, but also to other areas within the licensee's gambling system where stakes, winnings or losses are displayed. These requirements therefore also apply, for example, with regard to the information provided by the licensee pursuant to Section 4.31(2) of the Remote Gambling Decree regarding (the movements in) the player's gambling account.

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| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | | *GLI Europe B.V.* | | |
| **63**<br><br>B4.2.3 and R3.2.1<br><br>**ID NL:**<br>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**<br><br>R3.2a.1<br><br>**ID NL:**<br>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. | | N/A | Covered by a separate RNG certification (REF: RN-246-EYL-24-01-609). | |

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.

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| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | | *GLI Europe B.V.* | | |
| **65**<br><br>R3.2a.3 | In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data | | N/A | Covered by a separate RNG certification (REF: | |

| ID NL:<br>KS.09.12_2.0 | set of at least 1,000,000 outcomes, successfully passes the below tests:<br>• the DIEHARD Test (Marsaglia) and;<br>• the NIST (National Institute of Standards and Technology); | | RN-246-EYL-24-01-609). | |
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| | 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 | Covered by a separate RNG certification (REF: RN-246-EYL-24-01-609). | |
| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | | *GLI Europe B.V.* | |
| **66**<br><br>R3.2.1<br><br>**ID NL:**<br>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. | N/A | Covered by a separate RNG certification (REF: RN-246-EYL-24-01-609). | |
| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | | *GLI Europe B.V.* | |
| **67**<br><br>R3.2.1<br><br>**ID NL:**<br>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.<br>Exception: when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent.<br>Examples:<br>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. 2, Ref. 5 |
| | **Methods Used:** | | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | | *GLI Europe B.V.* | |

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| **68**<br><br>R3.2.1<br><br>**ID NL:**<br>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. 2,<br>Ref. 5 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **69**<br><br>R3.2.1<br><br>**ID NL:**<br>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. 2,<br>Ref. 5 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **70**<br><br>R3.2.1<br><br>**ID NL:**<br>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. 2,<br>Ref. 5 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **71**<br><br>R3.2.1<br><br>**ID NL:**<br>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. 2,<br>Ref. 5 |
| | Explanatory note: constructions such as 'near miss', or similar constructions whereby situations of 'you almost won' are deliberately presented, are not permitted.<br>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**<br><br>R3.2.1<br><br>**ID NL:**<br>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. | N/A | This is not a Jackpot game. | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **73** | In terms of design and implementation, | Pass | | Ref. 2, |

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| **R3.3** | establish that the pay-out rate presented is the theoretical pay-out rate. | | | Ref. 4 |
| **ID NL:** KS.09.20_2.0 | Explanatory note:<br>The theoretical pay-out rate must correspond to the pay-out rate.<br>Below is an example with a bet of one euro.<br>Examples:<br>Option 1 = 0 euro (25% chance);<br>Option 2 = 0 euro (25% chance);<br>Option 3 = 1 euro (25% chance);<br>Option 4 = 2 euro (25% chance).<br>The theoretical pay-out rate = 75%. | | | |
| | **Methods Used:** | PC-TC-001, WI-FI-009 | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **74**<br><br>R3.2.2 | In terms of design and implementation, establish that the identity of participants in gambling is known to the licence holder. | N/A | Out of scope (only game functionality is tested). | |
| **ID NL:** KS.09.21_2.0 | **Methods Used:** | PC-TC-001, WI-FI-009 | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **75**<br><br>R3.2.2 | 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 | This is an Instant game. | |
| **ID NL:** KS.09.22_2.0 | **Methods Used:** | PC-TC-001, WI-FI-009 | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **76**<br><br>R3.2.2 | In terms of design and implementation, establish that technical facilities are in place to recognise, analyse and record suspicious circumstances. | N/A | Out of scope (only game functionality is tested). | |
| **ID NL:** KS.09.23_2.0 | **Methods Used:** | PC-TC-001, WI-FI-009 | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **77**<br><br>R3.2.2 | In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game. | N/A | This is an Instant game. | |
| **ID NL:** KS.09.24_2.0 | **Methods Used:** | PC-TC-001, WI-FI-009 | | |
| | **Performed by:** | *GLI Europe B.V.* | | |

| 78<br><br>R3.3<br><br>ID NL:<br>KS.09.25_2.<br>0 | In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded. | N/A | No such feature. | |
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| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | *GLI Europe B.V.* | | |
| 79<br><br>R3.8<br><br>ID NL:<br>KS.09.26_2.<br>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. 2,<br>Ref. 3 |
| | 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,<br>Ref. 2,<br>Ref. 3 |
| | Explanatory note:<br>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.<br>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.* | | |
| 80<br><br>B4.34 and R3.4<br><br>ID NL:<br>KS.09.27_2.<br>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,<br>Ref. 2,<br>Ref. 3 |
| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | *GLI Europe B.V.* | | |
| 81<br><br>B4.34 and R3.4<br><br>ID NL:<br>KS.09.28_2.<br>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,<br>Ref. 2 |
| | Methods Used: | PC-TC-001, WI-FI-009 | | |
| | Performed by: | *GLI Europe B.V.* | | |

| 82 B4.34 and R3.4 | 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, Ref. 2 |
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| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| **ID NL:** KS.09.29_2.0 | **Performed by:** | *GLI Europe B.V.* | | |
| 83 B4.34 and R3.4 | 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, Ref. 2 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| **ID NL:** KS.09.30_2.0 | **Performed by:** | *GLI Europe B.V.* | | |
| 84 B4.34, B4.38 and R3.4 | 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** | | |
| **ID NL:** KS.09.31_2.0 | **Performed by:** | *GLI Europe B.V.* | | |
| 85 B4.34, B4.38 and R3.4 | 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** | | |
| **ID NL:** KS.09.32_2.0 | **Performed by:** | *GLI Europe B.V.* | | |
| 86 B4.34 and R3.4 | In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages. | Pass | | Ref. 1, Ref. 2 |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| **ID NL:** KS.09.33_2.0 | **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 |
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| | 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. 2, Ref. 4, Ref. 5 |
| | 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 | No strategy based game. | |
| | Methods Used: | **PC-TC-001, WI-FI-009** | | |
| | Performed by: | *GLI Europe B.V.* | | |

| Addiction Prevention Article no. (B) Decree or (R) Regulation | | Determination | Result/Explanation | Documentation |
|---|---|---|---|---|
| 90 R4.3 ID NL: KS.10.01_2.0 | In terms of design and implementation, confirm that the licensee will record at least the following information in relation to each player per gambling session of the player: | | | |
| | a. a unique signifier of the gambling session, such that this gambling session can be distinguished from other gambling sessions; | N/A | Out of scope (only game functionality is tested). | |
| | b. the date and start time of the gambling session; | N/A | Out of scope (only game functionality is tested). | |
| | c. the duration of the gambling session. | N/A | Out of scope (only game functionality is tested). | |
| | Methods Used: | **PC-TC-001, WI-FI-009** | | |

| | Performed by: | GLI Europe B.V. | |
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| **91**<br><br>B9<br><br>**ID NL:**<br>KS.10.02_2.0 | In terms of design and implementation, establish that, after signing in, the player gains access to the player interface within the meaning of Section 1.1 of the Remote Gambling Decree. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design and implementation, establish that the required information as set out in Section 8(1) of the Remote Gambling Decree is accessible to the player through the gambling interface and the player interface. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design and implementation, establish that the required information as set out in Section 8(2) of the Remote Gambling Decree is accessible to the player through the player interface. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design and implementation, establish that the player has the option of changing their gambling account within the meaning of Section 1.1 of the Remote Gambling Decree via the player interface. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design and implementation, establish that each accessible part of the player interface contains the following information:<br>- what time it is in the Netherlands;<br>- the time elapsed since the player signed in;<br>- the player's balance on their gambling account. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design and implementation, establish that the following information is displayed on the landing page of the player interface:<br>- date and time of the player's penultimate registration as referred to in Section 1.1 of the Remote Gambling Decree. | N/A | Out of scope (only game functionality is tested). |
| | Methods Used: | **PC-TC-001, WI-FI-009** | |
| | Performed by: | GLI Europe B.V. | |

| 92<br><br>B13, R17<br><br>ID NL:<br>KS.10.03_2.1 | In terms of design and implementation, confirm that the licensee records at least the following information in respect of each participant in the betting and gambling activities offered on its platform: | | | |
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| | a. internal and external indicators, including:<br><br>- a high or increasing gambling frequency;<br>- long or increasingly long gambling sessions;<br>- inappropriate treatment of or language in respect of other persons;<br>- stakes or betting behaviour that are different from the stakes or bets the player has made previously;<br>- expressions of frustration or discomfort;<br>- irregular gambling hours;<br>- setting or having set a high deposit limit | N/A | Out of scope (only game functionality is tested). | |
| | *Explanatory note:<br>In relation to young adults, a high deposit limit means a deposit limit with an amount equal to or greater than:<br>a. €150 per month;<br>b. €37.50 per week in the absence of a deposit limit per month;<br>c. €5.35 per day in the absence of a deposit limit per month or per week.<br><br>In relation to people in the age bracket of 24 and older, a high deposit limit means a deposit limit with an amount equal to or greater than:<br>a. €350 per month;<br>b. €87.50 per week in the absence of a deposit limit per month;<br>c. €12.50 per day in the absence of a deposit limit per month or per week. | | | |
| | b. the measures it has undertaken to comply with Section 18 of the Remote Gambling Decree. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, confirm that the licensee remotely records how often players sign in to gain | N/A | Out of scope (only game functionality is tested). | |

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| | access to the player interface within the meaning of Section 1.1 of the Remote Gambling Decree. | | | |
| | In terms of design and implementation, confirm that the licensee records the foregoing information in a way that allows for early detection of excessive participation in the betting and gambling activities organised by the licensee or a potential gambling addiction. | N/A | Out of scope (only game functionality is tested). | |
| | In terms of design and implementation, confirm that the licensee records the foregoing information in such a way that it can be traced back to the player's data. | N/A | Out of scope (only game functionality is tested). | |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| | **Performed by:** | *GLI Europe B.V.* | | |
| **93**<br><br>B14, B15<br><br>**ID NL:**<br>KS.10.04_2.0 | In terms of design and implementation, confirm that the licensee records at least the following information in respect of every participant in the betting and gambling activities offered on its platform: | | | |
| | a. the registration, referred to in Section 1.1 of the Remote Gambling Decree, and the termination thereof; | N/A | Out of scope (only game functionality is tested). | |
| | b. the login, referred to in Section 1.1 of the Remote Gambling Decree; | N/A | Out of scope (only game functionality is tested). | |
| | c. the age of the player, insofar as the player is below the age of 24; | N/A | Out of scope (only game functionality is tested). | |
| | d. the duration of the participation in betting and gambling activities; | N/A | Out of scope (only game functionality is tested). | |
| | e. the frequency of participation in betting and gambling activities; | N/A | Out of scope (only game functionality is tested). | |
| | f. the betting and gambling activities the player takes part in; | N/A | Out of scope (only game functionality is tested). | |
| | g. the limits of the gambling behaviour, referred to in Section 4.14(1) of the Remote Gambling Decree; | N/A | Out of scope (only game functionality is tested). | |

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| | h. the changes to the limits of the gambling behaviour; | N/A | Out of scope (only game functionality is tested). |
| | i. any exceeding of the limits of the gambling behaviour; | N/A | Out of scope (only game functionality is tested). |
| | j. the stakes and gambling outcomes; | N/A | Out of scope (only game functionality is tested). |
| | k. the payment transactions with the player; | N/A | Out of scope (only game functionality is tested). |
| | l. the changes on the gambling account, referred to in Section 1.1 of the Remote Gambling Decree; | N/A | Out of scope (only game functionality is tested). |
| | m. the suspension of ability to place bets or gamble. | N/A | Out of scope (only game functionality is tested). |
| | In terms of design and implementation confirm that the licensee analyses the aforementioned data and identifies signs that may point to excessive gambling and a potential gambling addiction at an early stage. | N/A | Out of scope (only game functionality is tested). |
| | **Methods Used:** | **PC-TC-001, WI-FI-009** | |
| | **Performed by:** | *GLI Europe B.V.* | |
| **94**<br><br>B18 + R18, R19<br><br>**ID NL:**<br>KS.10.05_2.1 | In terms of design and implementation, confirm that if the analysis, referred to in Section 15 of the Remote Gambling Decree, points to excessive gambling or a potential gambling addiction, the licensee will take appropriate measures to prevent excessive gambling and gambling addiction to the best of its ability.<br>At the very least, the holder of the licence to organise remote betting and gambling activities must implement such measures if the player exceeds a limit within the meaning of Section 4.14(2)(a) or (b) of the Remote Gambling Decree. | N/A | Out of scope (only game functionality is tested). |

| In terms of design and implementation, confirm that in the case of a reasonable suspicion of excessive betting and gambling or gambling addiction, the licensee will initiate a personal dialogue with the player, in which: | | | |
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| a. it will make the player aware of his or her gambling behaviour and of the development thereof if possible and of the dangers of gambling addiction; | N/A | Out of scope (only game functionality is tested). | |
| b. it will provide the player with advice regarding the facilities aimed at limiting their betting and gambling activities and regarding the assistance available from addiction treatment institutions, and encourage the player to make use of those facilities; | N/A | Out of scope (only game functionality is tested). | |
| c. it will investigate whether the player has the potential to cause harm to themselves or to their family as a result of excessive betting and gambling or gambling addiction; | N/A | Out of scope (only game functionality is tested). | |
| d. it will advise the player to make use of a facility which allows them to gain easy insight into their gambling behaviour; | N/A | Out of scope (only game functionality is tested). | |
| e. it will advise the player to make use of the option of having their access to betting and gambling activities offered by the licensee on its platform restricted in accordance with a maximum period of time per visit or login session to be determined by the player or during time slots determined by the relevant player; | N/A | Out of scope (only game functionality is tested). | |
| f. it will restrict the player's access to betting and gambling activities offered by the licensee on its platform to a maximum period of time per login session or during certain time slots without the player's consent; | N/A | Out of scope (only game functionality is tested). | |
| g. it will advise the player to make use of the option of excluding themselves from taking part in betting and gambling activities offered by the licensee on its platform for a fixed or indefinite period of time; | N/A | Out of scope (only game functionality is tested). | |

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| h. it will exclude the player from taking part in betting and gambling activities offered by the licensee on its platform without their consent for a fixed or indefinite period of time. | N/A | Out of scope (only game functionality is tested). | |
| In terms of design and implementation, confirm that when the licensee conducts the investigation referred to in subsection 18.2(c), it will at the very least consider the impact the player's gambling is having on their financial situation, family life, health and employment status. | N/A | Out of scope (only game functionality is tested). | |
| In terms of design and implementation, confirm that in addition to the intervention measures prescribed in accordance with Section 18(1) of the Remote Gambling Decree, the following intervention measures are applied: | | | |
| a. to send the player messages via the player interface to make them aware of their gambling behaviour in a sufficiently effective manner; | N/A | Out of scope (only game functionality is tested). | |
| b. to advise the player to make use of the option of excluding themselves from taking part in one or more betting and gambling activities or similar types of games offered by the licensee on its platform for a fixed period of time or at certain times; | N/A | Out of scope (only game functionality is tested). | |
| c. to exclude the player from taking part in betting and gambling activities or similar types of games offered by the licensee on its platform for a fixed period of time or at certain times. | N/A | Out of scope (only game functionality is tested). | |
| d. to terminate the player's registration without the player's consent. | N/A | Out of scope (only game functionality is tested). | |
| In terms of design and implementation, confirm that the intervention measure prescribed in accordance with Section 18(1) is at least tailored to: | | | |
| a. the player's age; | N/A | Out of scope (only game functionality is tested). | |
| b. the exhibited gambling behaviour; | N/A | Out of scope (only game functionality | |

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| | | is tested). | |
| c. the indicators that point to excessive betting and gambling or risks of gambling addiction; | N/A | Out of scope (only game functionality is tested). | |
| d. the response of the player to previous intervention measures, insofar as such measures have been taken. | N/A | Out of scope (only game functionality is tested). | |
| In terms of design and implementation, establish that when choosing to apply an intervention measure or the simultaneous or successive application of multiple intervention measures, the licensee shall consider the necessity, efectiveness and proportionality of the intervention measures. | N/A | Out of scope (only game functionality is tested). | |
| The licensee offering online beting and gambling activities shall in any case implement the intervention measure, referred to in Section 18(2)(a) at such a time when the player exceeds a limit within the meaning of Section 4.14(2)(a) or (b) or the Remote Gambling Decree. | N/A | Out of scope (only game functionality is tested). | |
| In terms of design and implementation, establish that licensee will apply an intervention measure* if a player reaches or crosses the limit as referred to in Section 4.14 (2) (a) of the Remote Gambling Decree. | N/A | Out of scope (only game functionality is tested). | |
| *Explanatory note: This concerns the intervention measure referred to in Section 18(2)(a) of the Canvassing, Advertising and Addiction Prevention (Beting and Gaming) Regulations at the time the player reaches or crosses the limit and the intervention measure referred to in Section 18(2)(d) of the Canvassing, Advertising and Addiction Prevention (Beting and Gaming) Regulations at the time of the next opportunity to bet, or at the end of the game. | | | |
| In terms of design and implementation, establish that the licensee will give an explanation of what prompted the intervention measure. | N/A | Out of scope (only game functionality is tested). | |
| **Methods Used:** | **PC-TC-001, WI-FI-009** | | |
| **Performed by:** | *GLI Europe B.V.* | | |

| | | | | |
|---|---|---|---|---|
| | In terms of design and implementation, confrm that the licensee will regularly use the player interface to remind players of: | | | |
| **95**<br><br>R15<br><br>**ID NL:**<br>KS.10.06_2.1 | a. the limits of their gambling behaviour, referred to in Section 4.14(1) of the Remote Gambling Decree, at the moment the player registers or signs of, as well as at the moment they start a game; | N/A | Out of scope (only game functionality is tested). | |
| | b. the reaching or exceeding of 50% of a limit within the meaning of Section 4.14(2) opening lines and (a) or (b) of the Remote Gambling Decree at the moment that occurs; | N/A | Out of scope (only game functionality is tested). | |
| | c. how much time has elapsed since the start of the frst game following their registration each time thirty minutes elapse until the time of their sign-off. | N/A | Out of scope (only game functionality is tested). | |
| | Explanatory note:<br>The licensee must ensure that the player is alerted in a clear and understandable way by means of a message via the player interface about their gambling behaviour in relation to the limits they have set for their gambling behaviour. This message can take the form of an informative pop-up, for example. The licensee's message must appear in a clear manner to the player within the gambling interface. This means that the message is visible to the player and this atracts their atention. The information in the message must also be understandable to the player. This means avoiding complicated language, for instance. | | | |
| | **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.<br><br>Please note that part of the Inspection Assessment was based on the RTP Calculations performed by iTech Labs. GLI has been provided with the test results for the purpose of |

| | | | |
|---|---|---|---|
| | | | GLI's assessment, as well as the documented procedures under which the tests were performed in accordance to their applicable accreditation (ISO/IEC 17025 and ISO/IEC 17020) granted by NATA (Accreditation number 15690). |

**Findings**

No non-conformities were found.

## 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.

Testing was completed in a test environment where the game is integrated into the platform using the RNG as documented in GLI report RN-246-EYL-24-01-609.

GLI generated the checksums of the files and/or directories using the methods stated below:

Verify+ by Kobetron™ - Verification Procedure

1. Open Verify+ by Kobetron™.
2. Select the 'File' or 'Directory' radio button.
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.

## 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.

James Boje

Managing Director EMEA

Executive