



Report Type:	Inspection
Report Date:	25 April 2025
Inspection Body:	GLI Europe B.V. Diakenhuisweg 29-35 2033AP Haarlem The Netherlands
Report Recipient:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL
Jurisdiction:	Netherlands Remote
Technical Standard(s) for Inspection:	<ul style="list-style-type: none">• Remote Gambling Assessment Scheme (Remote gambling conformity assessment scheme) Version 2.1
Supplementary Documentation:	<ul style="list-style-type: none">• RGD: Decree of 26 January 2021 laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Decree)• RGR: Regulation of the Minister for Legal Protection of 21 January 2021, no.3181155, laying down provisions for the implementation of the Remote Gambling Act (Remote Gambling Regulation), including amendment of 12 June 2024, no.5531723.
Software Suppliers:	Eyecon Alderney Limited Inchalla, Le Val Alderney GY9 3UL



Submitting Party/Licensee Name: Eyecon Alderney Limited
Inchalla, Le Val
Alderney
GY9 3UL

Products Inspected: Clover Rollover StarTrail

as described in the Software Product Details section.

File Numbers: MO-246-EYL-25-01

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:
Complies

Request Date: 04-March-2025

Evaluation Period: 10-March-2025 – 16 April 2025

Evaluating Laboratories:

- GLI Europe B.V.
Diakenhuisweg 29-35
2033 AP Haarlem
The Netherlands
RvA I111

RvA Registration Number of Accreditation applicable to this Report:

Inspection	I111
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Software Product Details

GLI inspected the following game:

Game Type	Game Name	Version
Slot Game	1: Clover Rollover StarTrail	5.17.3

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 (3.19.1)
Browser(s) and Version(s) Evaluated With	Google Chrome Desktop (135.0.7049.85)
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:	Clover Rollover StarTrail
SHA-1 Checksum:	D187FC1145DB98232D9A75FAE3BB6BABE37AA3EE
File Name:	CarbineGameComponent.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	C7585F7B8C7E1101DFF6010DB2D68EE9DD9F023C



File Name:	carbine-game-engine-5.17.3.jar
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	53895C7A89154315BB862CB3EFDDCB7718C9608D
File Name:	carbine-slots_cloverRolloverStarTrail_93_standard-1.0.6.json
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	295C5AB1FE6D6CE2B85CF7B7B0822791D46BCB4B
File Name:	carbine-slots_cloverRolloverStarTrail_93_standard-1.0.6-config.jar
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	2D2C55AA3A494039C79D9619A5FCC00F0C02DFF5
File Name:	CountSymbolEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	5B672DCAEB2EE1F8E4E217EBC22E855CAEF262F6
File Name:	DisplayGenerator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	98934DD5144D30275E248F249D6BBD1E205F1E0F
File Name:	EvaluationChain.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	E9C22E7207EFD683DB6817F7FE83FD77CA054E89
File Name:	EyeconSpinGameRules.class



Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	44201515F1F86C8359960521DB5E26EDA0529C70
File Name:	GameWinsCalculatorImpl.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	BC67862F3ACB319099C003C43D3DC097D3A53D28
File Name:	LinesWinMultiPatternEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	66E0E54523D54065ADEDAD2D0DADEFABAD62AE91
File Name:	Multiplier.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	F531EE860F01A7E834D54699147D410DBE0050C0
File Name:	PatternMatchingEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	445D14E7008AEB2ADC2F1D7F9501F07155E300BC
File Name:	PrizeLinePatternMatchingEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	D95B04EA9A6BD03E511902829FCF07FD58AA3C96
File Name:	PrizeLineTriggerEvaluator.class
Game Name:	Clover Rollover StarTrail



SHA-1 Checksum:	FD3CA5480EF084048F53B9DF7D3B3F4A44748876
File Name:	PrizeMultiplier.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	6F3D9718F22B339FCF2234B94C66C7A5740F712F
File Name:	RebetDetailBuilder.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	7985465EA53A6FA715E955B62C9C9CB20DF7FB09
File Name:	RebetEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	917D2DB667E3CC9B7948E0FEDB865ACB6DC1560F
File Name:	RebetsLineWinPatternMatchingEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	2C6CA5C8A2A21D390C5CB72A4F150A893CFB4C50
File Name:	ReelStripGenerator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	8BA9847BC3CAB82131028C7F006CB48158F962D9
File Name:	ReelSymbolExpander.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	C5FB3D2007CF2335B804BBAA0776311765A3169B



File Name:	ResetRebetEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	8A575FE26CFF9E274584C71AECF4F078509F8005
File Name:	RetriggerCount.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	44F2CF802D72121B3BC39FD64061AD2F16D56BD4
File Name:	RngSequences.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	B5E85B10AB646B596E6BE2F98EA8230C6F966ED4
File Name:	SlotGameVariableConfigurationImpl.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	7A66132A82AA2E17458EB0FACEAB823B27635028
File Name:	SymbolHoldSpinGame.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	60B9EA9E815CE61119FC2B6111D315C473F15485
File Name:	SymbolHoldSpinRuleImpl.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	EBBFC0412A54A19FA8B9E4D24DC7890E6DD6FC30
File Name:	SymbolHoldSpinScreenEvaluator.class



Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	7513314BF6290A31C239FA597B6BF681D8FC92BA
File Name:	SymbolHoldTriggerEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	6AEC46DEEA088EB6C4ABF85169426C0598D3F232
File Name:	SymbolSwapSpinShapeEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	247C9BF8FB01A2EE6E9CBFE7826455979B5273A1
File Name:	SymbolSwapSpinTriggerEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	BA50946EE127837792EBFCC08BFA3737D309CD8D
File Name:	TriggerRandomMultiplierEvaluator.class
Game Name:	Clover Rollover StarTrail
SHA-1 Checksum:	069F725B648D95A8C51C8285FCBE70C089792F78

Game Inspection

A description of the submitted software is listed below.

1. Clover Rollover StarTrail

Clover Rollover StarTrail is a 5-reel, 20-Payline online reel game. The game includes a 'StarTrail Feature', a 'StarTrail Feature Payout' feature, a 'Bet+ Mode' feature, a 'Free Games' feature and a 'Lucky Clover Bonus' 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
Clover Rollover StarTrail	93%	93.242%	93.242%	93.26%

Jurisdictional Requirements

Documentation Used for the Inspection

Document No	Document Title	Version/Date of Issue
1	Game Interface Worksheet FM-EN-450	10 April 2025
2	iGaming Emulation Test Script FM-EN-519 EmulationEvidence.zip	15 April 2025
3	iGaming Game Accounting and History Test FM-EN-338 AccountingVideoEvidence.zip	09 April 2025
4	GLI CloverRolloverStarTrail 93%	10 April 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

Gambling Technology	Determination	Result/Explanation	Documentation
54 R3.11 ID NL: KS.09.01_2.0	In terms of design, confirm that the licensee identifies, analyses and evaluates potential integrity risks and always includes the following issues in its considerations:		
	a. the relevant characteristics of players;	N/A	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	
	d. the behaviour of players, including at least their gambling behaviour.	N/A	Out of scope, Game Inspection	
	<p>Explanatory note</p> <p>The geographic location from which players sign in may pose an integrity risk. Such risks may include players who log into their Dutch gambling account from abroad, in particular if this takes place from countries that are subject to sanctions. Another example of an integrity risk is if attempts are made to log in simultaneously or in short succession from various locations or attempts to log into the same gambling account, particularly if there are large physical distances between these locations. This may be a sign that someone is attempting to log in under a different name or that an attempt is being made to gain unauthorised access to a gambling account. Where the likelihood of collusion, as referred to in the foregoing, is greater, if players are registered at the same address, this will also be the case if multiple players are placing bets or gambling in the same game of chance from the same location.</p>			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
<p>55</p> <p>R3.2.2</p> <p>ID NL: KS.09.02_2.0</p>	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.	PASS		[Ref.1,5]
	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 R3.4.1 ID NL: KS.09.03 _2.0	In terms of design, establish that the licence holder only uses names for the games on offer that match the types of game actually being played (poker, roulette, betting, etc.).	PASS		[Ref.2,1]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
57 R3.6 ID NL: KS.09.04 _2.0	In terms of design, establish that the licence holder will only award non-cash prizes to people who have actually won them and that the licence holder will not do so until it has reliably confirmed and verified the player's identity and current account as specified in the foregoing standards.	N/A	No non cash prizes 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 R3.7 ID NL: KS.09.05 _2.0	In terms of design and implementation, establish that devices cannot automatically begin taking part in betting or gambling activities without the input of the player.	PASS		[Ref.3,1]
	In terms of design and implementation, establish that a player will not begin participating in a game until they press a real or virtual button to confirm their stake.	PASS		[Ref.3,1]
	In terms of design and implementation, confirm that games against the licensee do not include any form of automatic stakes.	PASS		[Ref.3,1]

	In terms of design and implementation, establish that the so-called auto-play functionality can only be used after the start of a game where another player is played at the same time.	N/A	The game has no Autoplay feature	
	<p>Explanatory notes on stakes and auto play:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		

<div>59</div> <div>R3.9</div> <div>ID NL: KS.09.06_2.0</div>	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 progress of the game, in accordance with rules that must be easily understood by the players (e.g. blinds in a game of poker).	PASS		[Ref.2,1]
	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.		
<div>60</div> <div>R3.9a</div> <div>ID NL: KS.09.07_2.0</div>	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 a slot 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 a slot game	
	ii. are protected against unlawful access, unauthorised use and manipulation;	N/A	This a slot 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 a slot 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 addiction;	N/A	This a slot 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 casino games.	N/A	This a slot game	
	Methods Used:	PC-TC-001, WI-FI-009		
<p>61</p> <p>R3.3</p> <p>ID NL: KS.09.08_2.0</p>	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.		

<p>62</p> <p>R3.5</p> <p>ID NL: KS.09.09_2.1</p>	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.3]
	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 a slot game	
		- the game involves both players registered with the licensee and players from foreign providers; and	N/A	This is a slot 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 a slot game	
		- the player can obtain information on the value of stakes, winnings and losses in euros in a clear and understandable way during the game;	N/A	This is a slot game	
		- the indication and value of stakes, winnings or losses in US dollars is not changed during the game	N/A	This is a slot game	

	<p>*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.</p>			
	Methods Used:		PC-TC-001, WI-FI-009	
	Performed by:		GLI Europe B.V.	
<p>63 B4.2.3 and R3.2.1 ID NL: KS.09.10_2.0</p>	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.	
<p>64 R3.2a.1 ID NL: KS.09.11_2.0</p>	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)
	<p>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.</p>			
	Methods Used:		PC-TC-001, WI-FI-009	
	Performed by:		GLI Europe B.V.	

<p>65</p> <p>R3.2a.3</p> <p>ID NL: KS.09.12_2.0</p>	<p>In terms of design and implementation, establish that, for casino games, each Random Number Generator, with a data set of at least 1,000,000 outcomes, successfully passes the below tests:</p> <ul style="list-style-type: none"> the DIEHARD Test (Marsaglia) and; the NIST (National Institute of Standards and Technology); 	N/A	Covered by a separate RNG certification (REF: RN-246-EYL-24-01-609)	
	<p>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 $6 * 1000 = 6000$.</p>	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.		
<p>66</p> <p>R3.2.1</p> <p>ID NL: KS.09.13_2.0</p>	<p>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.</p>	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.		

<p>67</p> <p>R3.2.1</p> <p>ID NL: KS.09.14_2.0</p>	<p>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.</p> <p>Exception: when using a randomness mechanism without replacement, the outcome of the random parts can be predictable to a certain extent.</p> <p>Examples: a second draw from a real or virtual pile of cards without the first card drawn being put back or a draw of virtual bingo without the first draw being replaced.</p>	PASS		[Ref.2,5]
	Methods Used:			
	Performed by:			
<p>68</p> <p>R3.2.1</p> <p>ID NL: KS.09.15_2.0</p>	<p>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.</p>	PASS		[Ref.2,5]
	Methods Used:			
	Performed by:			
<p>69</p> <p>R3.2.1</p> <p>ID NL: KS.09.16_2.0</p>	<p>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.</p>	PASS		[Ref.2,5]
	Methods Used:			
	Performed by:			

70 R3.2.1 ID NL: KS.09.17_2.0	In terms of design and implementation, establish that the gambling can function in the same way, independently of the means used by the players.	PASS		[Ref.2,5]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
71 R3.2.1 ID NL: KS.09.18_2.0	In terms of design and implementation, establish that the odds of winning or losing expected by the player correspond to the odds generated and presented by the gambling activities.	PASS		[Ref.2,5]
	Explanatory note: constructions such as 'near miss', or similar constructions whereby situations of 'you almost won' are deliberately presented, are not permitted. For example, gambling activities in which a physical object is simulated (e.g. dice, roulette wheels, fruit machines) will have to provide fair results that are in line with expectations with regard to a physical object.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
72 R3.2.1 ID NL: KS.09.19_2.0	In terms of design and implementation, establish that, where present, the jackpot is linked to a game outcome of the gambling activities and that the jackpot is part of the prize schedule of the gambling activities.	N/A	This is not a Jackpot game	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
73 R3.3 ID NL: KS.09.20_2.0	In terms of design and implementation, establish that the pay-out rate presented is the theoretical pay-out rate.	PASS		[Ref.2,4]

	<p>Explanatory note: The theoretical pay-out rate must correspond to the pay-out rate. Below is an example with a bet of one euro. Examples: Option 1 = 0 euro (25% chance); Option 2 = 0 euro (25% chance); Option 3 = 1 euro (25% chance); Option 4 = 2 euro (25% chance). The theoretical pay-out rate = 75%.</p>			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
<p>74 R3.2.2 ID NL: KS.09.21_2.0</p>	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)	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
<p>75 R3.2.2 ID NL: KS.09.22_2.0</p>	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 a slot game	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
<p>76 R3.2.2 ID NL: KS.09.23_2.0</p>	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)	
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
<p>77 R3.2.2 ID NL: KS.09.24_2.0</p>	In terms of design and implementation, establish that, in player-to-player gambling activities, the participants are registered per game.	N/A	This a slot game	

	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
78 R3.3 ID NL: KS.09.25_2.0	In terms of design and implementation, establish that any deviations in a mechanical Random Number Generator are recorded.	N/A	No such feature	
79 R3.8 ID NL: KS.09.26_2.0	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
	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.2,3]
	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.1,2,3]
80 B4.34 and R3.4 ID NL: KS.09.27_2.0	<p>Explanatory note:</p> <p>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.</p> <p>Sufficient opportunity means there must be sufficient time to absorb information and make a choice.</p>			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
	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.1,2,3]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		

81 B4.34 and R3.4 ID NL: KS.09.28_2.0	In terms of design and implementation, establish that each game is provided with as comprehensive an explanation of the game as possible, including instructions on how to play.	PASS		[Ref.1,2]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
82 B4.34 and R3.4 ID NL: KS.09.29_2.0	In terms of design and implementation, establish that the game explanations and related instructions do not give rise to deception or misunderstanding.	PASS		[Ref.1,2]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
83 B4.34 and R3.4 ID NL: KS.09.30_2.0	In terms of design and implementation, establish that the game explanations and related instructions are displayed using the tool used by the player for the gambling.	PASS		[Ref.1,2]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
84 B4.34, B4.38 and R3.4 ID NL: KS.09.31_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions are in any case drawn up in the Dutch language.	PASS		[Ref.1]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
85 B4.34, B4.38 and R3.4 ID NL: KS.09.32_2.0	In terms of design and implementation, establish that the game explanations and corresponding instructions are set to Dutch by default.	PASS		[Ref.1]

	Explanatory note: the player must be able to change their default setting after registration.			
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
86 B4.34 and R3.4 ID NL: KS.09.33_2.0	In terms of design and implementation, establish that the available game explanations and related instructions are the same in all languages.	PASS		[Ref.1,2]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
87 B4.34 and R3.4 ID NL: KS.09.34_2.0	In terms of design and implementation, establish that game explanations and related instructions are available before the player places their bet.	PASS		[Ref.1]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
88 B4.34 and R3.4 ID NL: KS.09.36_2.0	In terms of design and implementation, establish that game explanations and corresponding instructions are also available during the game.	PASS		[Ref.1]
	Methods Used:	PC-TC-001, WI-FI-009		
	Performed by:	GLI Europe B.V.		
89 B4.34 and R3.4 ID NL: KS.09.37_2.0	In terms of design and implementation, establish that the game explanations and accompanying instructions contain information on the theoretical pay-out rate of the gambling activities.	PASS		[Ref.2,4,5]
	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.		

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.	<p>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.</p> <p>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</p>



			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).
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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.

A handwritten signature in black ink, appearing to read "J. Boje", is positioned above the printed name.

James Boje

Managing Director EMEA

Executive